Under 18 Student Policy

1. **Purpose**

The policy establishes a framework to ensure that appropriate accommodation, support and general welfare arrangements are in place for students who are under 18 years of age (‘underage’)

Additionally, this policy outlines the reporting mechanisms for circumstances where there is a reasonable suspicion that a person under the age of 18 years has been subjected to, or is at risk of, significant harm, including physical, sexual, or emotional abuse. It also outlines the reporting requirements for reports of child abuse while undertaking child-related work at or on behalf of the Institution.

2. **Scope**

The policy applies to all students under 18 years of age before and during their commencement of studies at the Institution. It also applies to staff and approved providers who provide accommodation and welfare support to these students at or on behalf of the Institution.

3. **Definitions**

See *Glossary of Terms*.

4. **Policy Statements**

4.1 The Institution is committed to safeguarding the safety, wellbeing and rights of students under 18 years of age. This policy and associated procedures reflect the Institution’s dedication to providing a secure and supportive environment for all students under 18 in accordance with Standard 5 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 and relevant Australian legislation.

4.2 Where the Institution takes on responsibility for approving the accommodation support and general welfare arrangements for students under 18 the Institution ensures that appropriate arrangements are in place prior to the issuance of a student visa. Although these specific visa-related requirements do not apply to domestic students, the Institution extends the same on-campus

support services to all students under 18. This includes compliance with the Children and Young Persons (Care & Protection) Act 1998, Children's Guardian Act 2019, Child Protection (Working with Children) Act 2012 and Crimes Act 1900 ensuring consistent standards of care and protection across the student community.

Enrolment – All Students

4.3 The Institution only enrols students under 18 years of age under the following conditions:

1. the student meets all admission requirements as per the *Admissions Policy*;
2. the student is at least 17 years of age at the time of enrolment;
3. the acceptance of offer and written agreement is signed by a parent or legal custodian; and
4. suitable accommodation and welfare arrangements are confirmed as detailed in paragraph 4.4.

Enrolment – International Students

4.4 Before a student visa is granted, the Department of Home Affairs (DHA) requires one of the following accommodation and welfare arrangements to be in place for international students under 18 years of age until they either turn 18 or cease enrolment at the Institution:

1. the student intends to reside with a parent or legal custodian, as detailed and approved by the DHA;
2. the student intends to reside with a nominated relative aged 21 years or older, as approved by the DHA; or
3. the Institution arranges and approves the student's accommodation, support and general welfare.

Institution-Approved Accommodation and Welfare Arrangements

4.5 Where the Institution assumes responsibility for these arrangements under paragraph 4.4c, it may approve:

1. on-campus accommodation (subject to approved inspection); or
2. homestay arrangements with an external provider; and

3. welfare services provided by Institution-nominated welfare service providers.

4.6 Students must provide the Institution with a copy of the binding agreement between themselves and the approved provider.

Confirmation of Enrolment (COE) Confirmation of Appropriate Accommodation and Welfare

4.7 The Institution issues Confirmation of Enrolment (COE) and Confirmation of Appropriate Accommodation and Welfare (CAAW) letters only when:

4. it is satisfied that suitable Institution-approved accommodation and welfare arrangements are in place, as per 4.3d, 4.4c, 4.5, 4.6 and 4.10a; and
5. the required documentation has been completed, signed and returned.

4.8 The minimum period on the CAAW must be:

1. the same length as the COE; and
2. Extended by seven days beyond the course end date or until the student turns 18 years of age, whichever comes first.

4.9 Students under 18 are provided with age-appropriate and culturally sensitive information during the application and orientation process. This includes, but not limited to:

- transportation services for international students (including airport transfer and designated meeting points);
- accommodation and welfare services (e.g., homestay or on-campus options);
- living and studying on-campus;
- orientation Week schedule and activities;
- campus facilities (including access to phones and free internet to contact parents upon arrival);
- emergency contacts and procedures;
- reporting mechanisms for incidents or allegations of sexual, physical and other abuse;
- academic and support services; and
- safe online behaviour, privacy, and digital wellbeing.

Third-Party Arrangements

4.10 The Institution ensures the quality and safety of third-party (homestay) accommodation and welfare arrangements for students under 18 through the following measures, as detailed in the *Under 18 Student Procedures* and relevant contractual agreements:

1. all accommodation for under 18 students is inspected prior to approval to confirm services are appropriate to a student's age, safety and wellbeing needs. This is undertaken before issuing the CAAW and at least every six months thereafter using a standardised checklist. Inspection outcomes and follow-up actions are documented and retained for audit purposes; and
2. the Institution monitors all third-party providers engaged to organise, assess and deliver welfare and accommodation services for students under 18.

4.11 Accommodation service providers must facilitate inspections by the Institution upon request.

Working with Children Checks

4.12 All adults involved in the care, support and oversight of students under 18 must hold a valid Working with Children Checks (WWCC). This includes:

1. homestay family members;
2. staff of accommodation and welfare service providers; and
3. any other personnel with direct contact with students under 18.

4.13 The Institution is responsible for ensuring any adults involved in or providing accommodation or welfare to students have the appropriate WWCC as detailed in the *Under 18 Student Procedures*.

Staff Training

4.14 All staff involved in the care, support and oversight of students under 18 are required to complete training modules on student safety.

On-Campus Welfare

4.15 In addition to arrangements made through approved external welfare providers, students under 18 have access to on-campus support services. These services include:

1. academic progress and coaching;
2. personal welfare and emotional support;
3. social integration and wellbeing;
4. financial guidance;
5. regular check-ins for under 18s; and
6. general safety and security support.

4.16 Students under 18 living in on-campus accommodation must abide by the *Accommodation Rules*.

Changes to Welfare Arrangements

4.17 Students under 18 wishing to change their accommodation and welfare arrangements must:

1. obtain prior written approval from the Institution; and
2. complete and submit the appropriate change request form, which must include the written consent of a parent or legal custodian.

Suspension or Cancellation of Enrolment

4.18 Where the Institution is responsible for approving the welfare arrangements of an international student under 18, and the Institution suspends or cancels the student's enrolment, it will continue to maintain welfare approval until one of the following occurs:

1. the student has alternative welfare arrangements approved by another registered provider;
2. the student's care is transferred to a parent or nominated relative as approved by the DHA;
3. the student leaves Australia;
4. the Institution has notified DHA as per paragraphs 4.20

4.19 The Institution may suspend or cancel the student's enrolment in instances whereby it has notified DHA that it is no longer able to approve the student's welfare arrangements or that it 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.

Transfers Between Providers

4.20 If the Institution enrols an international student under 18 whose welfare arrangements are currently approved by another registered provider, the Institution must:

1. negotiate the transfer date with the releasing provider to ensure continuity of welfare arrangements; and
2. inform the student of their visa obligation to maintain current welfare arrangements until the transfer date, or alternatively, return to their home country or have alternate welfare arrangements approved before the transfer takes effect.

Reporting Changes to Welfare

4.21 If the Institution is no longer able to approve the accommodation and welfare arrangements of a student under 18, it will:

1. make reasonable efforts to immediately notify the parent or legal custodian; and
2. for international students, notify the relevant Australian Government department within 24 hours.

Critical Incidents and Welfare Concerns

4.22 Institution staff and accommodation or welfare service providers must report any critical incidents or concerns involving risk of significant harm to a student under 18 – including allegations or suspicions of sexual, physical, emotional or other abuse – to the designated staff. Reporting must follow in the procedures in the:

1. *Under 18 Student Procedures;*
2. *Critical Incident Policy and Critical Incident Management Procedures;*
3. *Sexual Harm Policy and Sexual Harm Procedures.*

4.23 Where disruption occurs, the Institution must ensure appropriate accommodation and welfare arrangements are maintained.

4.24 If the Institution is unable to contact a student under 18 and has concerns for their welfare, it will:

1. make reasonable efforts to locate the student; and
2. notify relevant authorities, including the Police and appropriate government agencies as detailed in the *Critical Incident Policy*.

Record Keeping

4.25 All records relating to under 18 student welfare and accommodation are retained for at least two years after a student ceases to be an accepted student.

Disclaimer

4.26 The Institution is not the legal guardian for the student under 18 while in Australia.

5. **Roles and responsibilities**

5.1 The **Chief Operations Officer (COO)** is responsible for the implementation and operational oversight of this policy and related procedures including:

- ensuring institutional compliance with the National Code and relevant child protection legislation;
- managing risks and reporting related to underage student welfare;
- acting as a Nominated Institution Representative for child safety matters;
- overseeing and monitoring all third-party accommodation and welfare service providers;
- ensuring all on and off campus inspections are undertaken to schedule and appropriately;
- ensuring any adults involved in or providing accommodation or welfare to students have the appropriate WWCC.

5.2 The **Associate Vice President (Campus and Operations)** supports the COO in implementing the policy and procedures. Responsibilities include:

- coordinating campus-level welfare services and accommodation arrangements;
- ensuring staff training and compliance with child safety obligations;
- liaising with external welfare and accommodation providers;

- ensuring all residential staff hold valid Working With Children Checks;
- providing age-and culturally-appropriate information as part of the orientation program to satisfy National Code 5.2;
- supporting continuous improvement of welfare practices for students under 18.
- the implementation of the *Under 18 Student Policy* and the *Under 18 Student Procedures*.

5.3 The **Manager (Residential Services)** is responsible for the operational management of on-campus accommodation for students under 18. Responsibilities include:

- ensuring accommodation environments are safe, age-appropriate, and compliant with child protection standards;
- coordinating regular inspections of on and off campus accommodation;
- supporting students with accommodation-related concerns and liaising with Student Success Centre (SSC) staff.

5.4 The **Admissions Manager** issues CAAW letters to under 18 students.

5.5 The Vice President (People and Training) ensuring all staff working with under 18s hold a valid WWCC;

5.6 Designated staff members authorised to act on behalf of the Institution in matters relating to the welfare and safety of students under 18. Current representatives include:

- Chief Operations Officer
- Student Success Centre Manager

Responsibilities include:

- investigating and reporting allegations or suspicions of abuse or harm;
- ensuring appropriate escalation and reporting to external authorities; and
- maintaining continuity of welfare arrangements during incidents or transitions.

6. **Related documents**

Accommodation Rules

Admissions Policy

Critical Incident Policy

Critical Incident Management Procedures

Risk Management Framework

Student Wellness Policy

Student Wellness Procedures

Support for Students and Wellness Policy Terms and Conditions of Enrolment

Under 18 Student Procedures

Working With Children Guidelines

Summary of changes	Approved by	Approved date
Created	Board of Directors	19 August 2019
	EMG	6 October 2021
Extensive changes, primarily consisting of rewrites to existing sections to improve clarity. All new content, added for continuous improvement purposes and alignment with current best practices,	Academic Board	21 November 2025