Under 18 Student Procedures

1. **Governing policy**

These procedures support the implementation of the *Under 18 Student Policy* and outline the responsibilities of staff and service providers in ensuring the safety and wellbeing of students under 18 years of age (underage). They reflect the Institution's commitment to compliance with:

- *National Code of Practice for Providers of Education and Training of Overseas Students 2018* (National Code), Standard 5;
- the Children and Young Persons (Care & Protection) Act 1998;
- the Children's Guardian Act 2019;
- the Child Protection (Working with Children) Act 2012; and
- the Crimes Act 1900.

2. **Scope**

These procedures apply to:

- all students under 18 years of age at of arrival in Australia and prior to or during commencement of studies at the Institution;
- all staff involved in the care, support and oversight of students under 18; and
- approved accommodation and welfare service providers engaged by or on behalf of the Institution.

3. **Procedures**

These procedures outline the key responsibilities and processes for managing the welfare and support of students under 18 years of age, where the Institution assumes responsibility for their accommodation and welfare arrangements.

Accommodation and welfare

Student must have accommodation approved either on-campus or through an Institution-approved accommodation provider. They must also engage an Institution-approved welfare provider. A Confirmation of Appropriate Accommodation and Welfare (CAAW) is only issued once these arrangements are

verified.

Verifying student accommodation

All accommodation is inspected prior to approval and at least every six months thereafter using a standardised checklist. Inspection outcomes and follow-up actions are documented and retained for audit purposes.

Working with Children Check (WWCC)

All staff, accommodation hosts and welfare providers who interact with students under 18 must hold a valid WWCC. Compliance is monitored and documented.

Monitoring third-party providers

The Institution engages third-party providers (e.g. homestay services and International Student Alliance) through formal agreements. The Institution monitors the third parties through its access to providers' online portals and regular reporting.

Welfare checks and contact

The Institution conducts regular welfare checks-in with students under 18 and maintains up-to-date contact details for the student, their parent(s)/legal custodian, legal guardian or nominated adult responsible for their welfare.

Reporting

All staff are required to report any critical incidents or risks of harm involving students under 18 including allegations or suspicions of sexual, physical, emotional or other abuse.

Critical incidents and disruption of arrangements

In the event of a critical incident or disruption to accommodation or welfare arrangements, the Institution must ensure that appropriate alternative arrangements are made to safeguard the student's wellbeing.

Table 1

Process	Responsibilities	Timeframe

Step 1 Accommodation and Welfare		
1.1. Students must have accommodation and welfare arrangements approved by the Institution before a CAAW is issued. 1.2. Approved accommodation options include: a. on-campus accommodation; b. homestay accommodation arranged through a provider approved by the Institution, under a formal agreement between both parties, and in compliance with the standards outlined in the to the NEAS Quality Area O – Homestay Service Providers Standards. 1.3. Welfare services must be arranged through International Student Alliance (ISA) 1.4 CAAW letters are only issued by the Admissions Team when: a. the COO has confirmed that appropriate accommodation and welfare arrangements are in place for the student; b. there is evidence of the student's homestay placement (binding agreement) OR evidence of proof of payment for on campus accommodation; c. there is evidence of the student's welfare arrangement with ISA (binding agreement).	Admissions Chief Operations Officer (COO) Associate Vice President (Campus and Operations) (AVPCO) Students	Before CAAW issued
Step 2 Verifying student accommodation		

2.1 Accommodation must be inspected prior to approval and every six months thereafter until the student turns 18 years of age. CAAW letters are not issued until initial inspections have been completed in accordance with paragraph 1.4. ***On-campus accommodation*** 2.2 Inspections of on-campus accommodation are conducted by ISA. The Institution is responsible for: a. contacting ISA to schedule inspections prior to a student's arrival and at six-month intervals thereafter; b. providing ISA with the required Inspection Checklist; c. documenting the inspection by: i. obtaining the completed Inspection Checklist from ISA; ii. logging the inspection date in the Inspection Log; iii. filing the completed Inspection Checklist. **Homestay accommodation** 2.3 Homestay providers must conduct a home inspection before placing a student. 2.4 Follow-up inspections must occur every six months. If a homestay provider conducts inspections only once a year, the Institution must arrange for ISA to perform inspections during the alternate six-month intervals. 2.5 The Institution must monitor and verify all homestay inspections by: d. requesting inspection reports from the homestay provider; e. recording inspection dates in the Inspection Log; f. for inspections conducted by ISA: i. providing ISA with the Inspection Checklist; ii. obtaining the completed Inspection Checklist; iii. logging the inspection date in the Inspection Log; iv. filing the completed Inspection Checklist.	Chief Operations Officer, Associate Vice President (Campus and Operations), homestay provider, ISA	Prior to approving student accommodation and issuing CAAW and every six months

Step 3 Working with Children Check (WWCC)		
3.1 All staff, accommodation hosts and welfare providers must hold valid WWCC documentation. 3.2 WWCC's are verified by: a. Institution: by the Vice President (People and Training). b. Homestay hosts and family members over 18: by the homestay provider. c. Welfare provider: by ISA for the recruitment of employees and volunteers as detailed in their *Child Safety Standards*; 3.3 The Institution can verify WWCCs for hosts and families by requesting a report or host profile from the homestay provider. 3.4 The Institution can verify the WWCC for the employee responsible for the welfare of the student by accessing ISA's online portal.	Institution, homestay providers, ISA	Ongoing
Step 4 Monitoring third parties		

4.1 The Institution maintains documented procedures for the selection, screening, and ongoing monitoring of all third-party accommodation and welfare providers. This includes: a. formal agreements with homestay providers for students under 18 who are not residing on-campus; b. a formal agreement with ISA to provide welfare services and verify student accommodation as requested; c. annual audits and reviews to ensure provider compliance with relevant standards. 4.2 Through its agreement with homestay providers, the Institution has access to an online portal to monitor individual student placements. Available reports include: a. homestay contact details; b. photos of homestay accommodation; c. inspection records; d. WWCC verification; and e. host interviews. 4.3 The Institution also accesses ISA's online portal to monitor welfare arrangements. Available information includes: a. records of student contact and support interactions; b. WWCC details of welfare staff; c. student placement status (current, impending, expired); and d. homestay accommodation records.	Chief Operations Officer Associate Vice President (Campus and Operations)	
Step 5 Welfare checks and contact		

5.1 The Institution conducts fortnightly welfare check-ins with students under 18 years, either in person or via phone/video call. If contact cannot be established within 48 hours, escalation procedures are triggered, including notifying relevant authorities if necessary. 5.2 Students are provided with a printed and electronic list of emergency contacts, including a nominated staff member. This information is recirculated at least once per trimester. 5.3 As per the student's Written Agreement, students must notify the Institution of any changes to their contact details within seven days. 5.4 The Institution verifies and updates contact details for underage students, their parent(s)/legal custodian(s), and responsible adults at least once per trimester. 5.5 Students approaching their 18th birthday are provided with information about changes to welfare arrangements and available support during the transition to adulthood.	Chief Operations Officer Associate Vice President (Campus and Operations)	
Step 6 Reporting		

6.1 The Chief Operations Officer (COO) prepares a report for each Executive Management Group meeting outlining key matters relating to the welfare of students under 18, as covered by these procedures. The COO also prepares an annual report for the Academic Board. 6.2. Upon receiving a report of a critical incident or suspected risk of significant harm to a student under 18 (including allegations or suspicions of sexual, physical, emotional and other abuse) the Nominated Institution Representative must: a. ensure the student is removed from any immediate danger, where possible; b. if there are reasonable grounds to suspect harm, report the matter to the Department of Communities and Justice via the Child Protection Helpline (132 111), or as outlined in paragraph 6.3; c. notify Police and any other relevant authorities if child abuse is suspected; and d. manage the Institution's response in accordance with the *Critical Incident Policy*, *Sexual Harm Policy* and all related procedures, including support for the student and fulfilment of legal obligations. 6.3 If any staff member is required to make a mandatory or urgent report under child protection legislation, they must inform the Nominated Institution Representatives, who will then submit a report to the Department of Communities and Justice by phone (132 111) or by eReport (if not urgent).	Chief Operations Officer, Associate Vice President (Campus and Operations)	
Step 7 Critical incidents/disruption of welfare and accommodation arrangements		

7.1 If a student under 18 is missing or experiences a disruption to their welfare arrangements, the Institution immediately:
a. implements temporary accommodation and support;
b. notifies the parent(s)/legal custodians;
c. escalates the matter to Police and government agencies as required; and
d. documents all actions.
7.2 In accordance with the *Critical Incident Management Procedures* and the *Sexual Harm Procedures*, if a critical incident or an allegation of abuse occurs involving an under 18 student – whether on-campus accommodation or with an approved homestay provider – the Chief Operations Officer or Associate Vice President (Campus & Operations) ensures appropriate arrangements are made by:
a. contacting the welfare provider;
b. contacting the homestay provider (if applicable);
c. Contacting the parent(s) or legal custodian;
d. relocating the student to emergency accommodation;
e. offering and arranging counselling support;
f. securing appropriate long-term accommodation; and
g. notifying relevant staff to update DHA via PRISMS within 24 hours of any address changes or if the Institution is no longer able to approve welfare arrangements within 24 hours.		

Step 8 Student feedback and complaints Students who have concerns about their welfare, accommodation or support services are encouraged to speak with a trusted member of staff or submit a complaint in accordance with the Complaints and Appeals Policy.		

4. Roles and responsibilities

Refer to the Under 18 Student Policy.

5. Compliance and monitoring

The Chief Operations Officer prepares report for each Executive Management Group meeting outlining key matters relating to the welfare of students under 18, as covered by these procedures. The COO also prepares an annual report for the Academic Board.

6. Version history

Summary of changes	Approved by	Approved date
Created		18 June 2020
	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.	LTC	17 October 2025
Remove references to the Student Centre Manager	EMG	12 February 2026