

# International Student Accommodation and Welfare Arrangements Policy and Procedures

## 1. PURPOSE

This policy applies when Kingswood College takes on responsibility for approving the accommodation, support and general welfare arrangements for overseas students who are under 18 years of age.

## 2. SCOPE

This policy applies to all members of the Kingswood College staff, volunteers and contractors (third party providers).

## 3. KEY RESPONSIBILITIES

Position/Roles	Responsibilities
International Student Coordinator	Screening, selecting and monitoring of host accommodation, in relation to international students
International Student Officer	Screening, selecting and monitoring of host accommodation, in relation to international students
Director of Community Engagement	Maintain the policy and update when necessary. Screening, selecting and monitoring of host accommodation, in relation to international students. Screening, inducting and monitoring of third party staff, working directly with international students
Registrar	Screening, selecting and monitoring of host accommodation.
Risk and Compliance Officer	Educating the host families in Child Safe Standards and their legal obligations. Educate and induct third party provider staff in College procedures and child safe requirements.

## 4. KEY ELEMENTS OF THE POLICY

### 4.1. Overview

It is critical that the College ensures the safety and welfare of our international students who are accommodated in homestay arrangements and provided with other welfare support services.

This group of students are particularly vulnerable as they face a number of challenges including significant cultural differences, language difficulties, and separation may be for the first time from their immediate family, and living with people they do not know.

This policy details the requirements the College must undertake in screening, selecting and monitoring accommodation and welfare arrangements for our students.

It is College policy that no student less than 13 years of age will be placed in homestay accommodation.

#### **4.2. International Students Obligations**

Kingswood College must meet certain obligations in regard to international students under the age of 18 years old (younger students) as outlined in the ESOS Act and the National Code.

These obligations include:

- school arranged homestay for international students must meet the minimum standards under the National Code and the VRQA Guidelines;
- meet Commonwealth, state or territory legal requirements relating to child welfare and protection (for example the Child Safe Standards and the Working with Children Act); and
- give younger overseas students important 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 (Refer to the ***International Student Orientation and Transition Programs*** and the ***International Student Handbook*** for more information).

If an international 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, overseas students can either:

- 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; or
- stay in accommodation, support and general welfare arrangements that have been approved by Kingswood College. In this case, Kingswood College will issue a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter.

If Kingswood College accepts responsibility for the welfare arrangements of an international student under the age of 18, a CAAW letter is created at the same time as a Confirmation of Enrolment (CoE). They must be created together as the details of the CoE appear in the CAAW and vice versa. The College representative signs a CAAW to confirm they are placing an international student into, or are approving, arrangements they consider suitable.

### **5. APPROVING ACCOMMODATION, SUPPORT AND GENERAL WELFARE ARRANGEMENTS**

#### **5.1. Nominating dates for which the College accepts responsibility**

In the CAAW, Kingswood College will nominate the beginning and end dates of the period for which it accepts responsibility for approving accommodation, support and welfare arrangements and must advise the Immigration Department of these dates in the form required by the Department.

The nominated beginning and end dates must cover the length of the CoE plus seven days at the end, at a minimum. If an international student who is under the age of 18 on a CAAW is transferring to another CRICOS registered school, this school must ensure there is no gap in welfare arrangements. In accepting the international student, the student's new school must liaise with the College to ensure the overseas student has appropriate accommodation, support and general welfare arrangements in place at all times and issue a CAAW letter covering the transition from one

accommodation arrangement to another (Refer to the *International Student Transfer Assessment Policy and Procedure* for more details).

## 5.2. Screening and Selecting all adults involved in providing student accommodation and welfare arrangements

Kingswood College must ensure that all adults involved in or providing accommodation and welfare arrangements to the international students:

- at all times have current and valid Working With Children Check clearances under the Working with Children Act; and
- are subject to the College's usual screening and selection practices for persons whom it proposes to engage to perform child-connected work in accordance with the Child Safe Standards (which includes any third party providers who assist in sourcing or providing the services) (Refer to the Screening and Selecting and Monitoring sections below).

## 5.3. Process for verifying the student's accommodation is appropriate to the student's needs.

Prior to the student's accommodation being approved, Kingswood College will verify that the student's accommodation is appropriate to the student's age and needs by:

- inspecting the Homestay accommodation facilities and immediate surrounding environment;
- meeting with and interviewing the Host family and completing the *Homestay Residence Checklist* (annexed to this policy).

The College will also verify at least every six months thereafter that the student's accommodation continues to be appropriate to the student's age and needs.

(Refer to the Screening and Selecting and Monitoring sections below).

## 5.4. Critical Incident & Emergency Management

The College has in place processes for critical incidents involving international students and a process for managing emergency situations and when welfare arrangements are disrupted for students under the age of 18 years of age.

Refer to the *International Student Critical Incident Communication Plan* for details.

## 5.5. Maintain up-to-date records of the students contact details

The College must maintain up-to-date records of the student's contact details including:

- contact details of the student's parent/s, legal guardian/s or any adult responsible for the student's welfare;
- the student's current residential address, mobile number (if any) and email address (if any); and
- who to contact in emergency situations.

The College will also include in the enrolment agreement with the student and his or her parent/s or guardian/s a requirement that the student or intending student, while in Australia and studying with the College, must notify the College of these contact details and any changes to them within 7 days of any change.

Refer to the *International Student Enrolment Agreement and Offer letter*.

#### **5.6. Change of accommodation arrangements**

The College must advise Immigration in the form required by that department:

- As soon as practical if the student will be cared for by a parent or nominated relative approved by the Immigration Department and a Confirmation of Appropriate Accommodation and Welfare (CAAW) is no longer required; and
- Within 24 hours if Kingswood College is no longer able to approve the student's welfare arrangements

If the College is no longer able to approve the welfare arrangements of a student the College, through its International Coordinator, International Student Officer or Registrar, must make all reasonable efforts to ensure that the student's parents or legal guardians are notified immediately.

#### **5.7. If the student is unable to be contacted**

The International Student Coordinator will ensure that

If the College is unable to contact a student and has concerns for the student's welfare, the College must make reasonable efforts to locate the student, including notifying other College staff who may be of assistance in locating the student, the Host family, the student's local support person and including, if appropriate notify the police and any other relevant Commonwealth and state agencies as soon as practicable.

The responsibility to locate the student will be with all staff of the College under the primary direction of the International Student Coordinator.

#### **5.8. Suspension or cancellation of the student's enrolment**

If the College has taken on responsibility for approving the accommodation, support and general welfare arrangements for a student and the College suspends or cancels the student's enrolment, the College must continue to approve the welfare arrangements for the student until any of the following applies:

- the student has alternative welfare arrangements approved by another CRICOS registered school;
- care of the student by a parent or nominated relative is approved by Immigration;
- the student leaves Australia;
- the College has notified Immigration 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.

Refer to the College International Student Deferment, Suspension and Cancellation Policy and Procedures.

#### **5.9. Student's welfare arrangements approved by another school**

If arrangements for the student's accommodation, support and general welfare has

been approved by another CRICOS registered school on the basis that the student intends transferring to that school, it is the obligation of that new school to:

- negotiate the transfer date for the welfare arrangements with the College to ensure there is no gap in those arrangements for the student;
- inform the student of his or her visa obligation to maintain their 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 are in place.

Refer to the College *International Student Transfer Assessment Policy and Procedures for details*.

## **6. THIRD PARTY ACCOMMODATION AND STUDENT SUPPORT SERVICES**

### **6.1. Homestay accommodation**

The College may contract with homestay accommodation agencies to assist with delivery of accommodation and student support services for international students including:

- help the College recruit homestay providers;
- provide 'shortlists', including details of agency-screened homestay options for the College to review, visit and potentially approve;
- collate documentation such as Working with Children Checks.

However, the College cannot:

- just refer students seeking homestay (via website or marketing material) to contracted accommodation agencies;
- state or imply in marketing materials that an accommodation agency exercises the school's role or responsibility in approving homestay accommodation;
- use accommodation agencies to verify that an overseas student's homestay accommodation is suitable for the student's age and needs, which must be undertaken by a person accountable to the Principal of the College.

Homestay services provided by the third party may include:

- Obtaining expression of interest from homestay families to accommodate students;
- Initial assessment of the accommodation provided;
- Obtaining and checking Working with Children Checks (WWCC) for all people over 18 years of age that will be staying in the Host house overnight at any one time;
- 24/7 emergency support and critical incident strategy;
- Providing an agreement with Host families outlining appropriate policies and the host obligations;
- Checking of referrals provided by the Host families;
- Providing Host training to ensure they understand their obligations and meet the required standards of homestay accommodation;
- Appropriate insurance cover ensuring the cover of host and students.

## **6.2. Student support and counselling**

The College may contract with student support service agencies to offer parents of students the option of paid additional support and counselling for their child, referred to as Local Support Services, providing it is clear that:

- the support service is not 'guardianship' and the service agency has no responsibility for the student's accommodation or welfare;
- the paid support service is additional to, and not in place of, the support and counselling the College normally provides to all students;
- the service agency is not contracted to offer 'guardianship' (which can be confused with legal guardianship of a child);
- the contract with the service agency does not state or imply that the agency will have responsibility for the student's accommodation or welfare or that agreement to the additional paid support services is a government or a student visa requirement;
- the service agency is not contracted to become the only method of communication between the College and the parent/s or legal guardian/s or the student; and
- the service agency is not contracted to exclusively hold or retain details of communication between the school and the parent/s or legal guardian/s or the student.

**Local support services** provided by a third party may include:

- Providing bilingual assistance to assist with communication to students and parents and legal guardians;
- assist the student and College with overseeing the day-to-day welfare, discipline and academic progress of each student.

## **6.3. Orientation and school vacation programs**

The College may engage commercial agencies to help it provide orientation programs and/or school vacation programs. However, the College cannot:

- refer students seeking orientation information to commercial agency websites; or
- contract commercial agencies to take responsibility for the accommodation and welfare of overseas students, including during school vacations or vacation programs.

## **6.4. Third party induction**

The College must ensure the staff of the third-party provider, who work directly with our students, have been appropriately screened, inducted and educated.

The College will gather, verify and record the following information about a person whom it proposes to engage to perform child connected work:

- Working With Children Check card details and check its status on receipt through use of the WWCC Victoria online WWCC checking tool.
- proof of personal identity and any professional or other relevant qualifications (VIT etc);



- the person's history of work involving children; and
- references that address the person's suitability for the job and working with children.

The College will induct and educate the third party provider staff, who work directly with our students, in College Child Safe Policy, our Code of Conduct and process for reporting child abuse.

Procedure for Third Party staff induction as follows:

- Obtain third party staff member details including name, email address, proof of identity documents, experience working with children, referees and relevant qualifications, WWCC etc.
- Forward the third-party employee name, email address and a copy of their WWCC card or VIT registration to the College main receptionist.
- Main Receptionist verifies validity of the WWCC or VIT using the online WWCC checking tool or VIT Portal and establishes the person as a service provider in the Visitor Management System, Who's on Location.
- Main receptionist then email's an invite to the "Service Provider" online Induction course in Who's on Location.
- Third Party completes the online Induction course and declares they have read and agree to abide by Kingswood College's Child Safe Code of Conduct.
- The Risk & Compliance Officer checks that the Third Party has completed the Induction Course within 4 weeks of receiving access to the online course.

As Kingswood College issues the Confirmation of Approved Accommodation and Welfare (CAAW) letter for international students who are under the age of 18, it accepts full responsibility for monitoring such arrangements in the interests of the welfare of the student. The College cannot delegate its responsibilities for approving the accommodation, support and general welfare arrangements for an international student to a third party.

## **6.5. Screening**

The College will carefully screen and select accommodation, Host families and student support providers.

The College will gather, verify and record the following information about the suitability of all persons whom it proposes to engage to perform child connected work:

- Working With Children Check status is valid on receipt or on an ongoing basis through use of the WWCC Victoria online WWCC checking tool.
- obtain proof of personal identity and any relevant professional qualifications (VIT, etc);
- the person's history of work involving children; and
- references that address the person's suitability for the job and working with children.

The College will review the screening undertaken by any third party provider and request additional information if and when required. The College must be satisfied that the third party has rigorous processes in place for verifications of hosts, accommodation and student support person to ensure the international student is residing in appropriate accommodation and has appropriate persons providing support.

## **6.6. Selecting**

The College will select the host family and any local support services person to be assigned to each student by:

- Reviewing the questionnaire completed by the student prior to arriving in Australia and ensuring an alignment with interest, family composition, and expectations;
- Interviewing all host families a
- Visiting the proposed accommodation;
- Reviewing the information and recommendations provided by the third-party provider;
- Checking screening processes, as detailed in 4.4 above;
- Ensuring the host family and local support person understands their legal obligations in regard to child abuse and who to report any concerns to; and
- Ensuring they are aware of the College's Child Safety Policy and have read and signed the College Child Safe Code of Conduct.

It is mandatory for all members of the host family to attend, prior to hosting a student as well as annually, training provided by the College on the College's policies and procedures for managing critical incidents Child Safe Standards and their legal obligations. Failure to attend this training may result in the removal of the family as a host family.

## **6.7. Monitoring**

Every six months a College staff member will visit the host accommodation and use the attached check list to review the suitability of the accommodation.

The International Student Officer and the International Student Coordinator will monitor and speak with international students regularly to assess their overall wellbeing along with any issues with host family. During these assessments, the International Student Officer and the International Student Coordinator will be mindful of the signs of harm and will actively consider these signs.

The Indigenous Coordinator to meet at least fortnightly with each Indigenous student one-on-one to identify any issues with their host family, accommodation or other issues.

Issues of concern to be brought to the attention of the Principal by the Coordinators.

## **6.8. Responsibility**

The International Student Coordinator, International Student Officer, Director of Community Engagement and Registrar are responsible for screening, selecting and monitoring host families for international students.

The Risk and Compliance Officer is responsible for ensuring the host families are educated, at least annually, in their responsibilities in relation to Child Safe Standards and the College's child safety policies and procedures for managing emergency situations and critical incidents.

The Principal, or their delegate, must be notified immediately of any breaches in this policy.

## **7. RELATED COLLEGE DOCUMENTS**

- Homestay Checklist



## **8. REFERENCES**

Education Services for Overseas Students Act 2000 (Cth) (ESOS Act)

National Code of Practice for Providers of Education and Training to Overseas Students 2018  
(National Code) Standard 5

VRQA Evidence Guide to the Guidelines for the Enrolment of Overseas Students Aged Under  
18 (VRQA Guidelines)

Ministerial Order No. 870 – Child Safe Standards – Managing the risk of child abuse in schools  
(Child Safe Standards)

Working with Children Act 2005 (Vic) (Working with Children Act)

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