

SAFETY, WELLBEING AND ACCOMMODATION FOR UNDER-18 (U18) STUDENTS POLICY AND PROCEDURES

1 Name of policy

This is the Safety, Wellbeing and Accommodation for Under-18 (U18) Students Policy and Procedure.

2 Commencement

This policy commences the day after the day on which it is registered.

3 Policy is binding

Except to the extent that a contrary intention is expressed, this policy binds Navitas Australia Pty Limited (formerly named Study Group Australia) (CRICOS Provider Code: 01682E) trading as Taylors College Sydney (the College), staff, students and affiliates.

4 Overview

This policy (and its procedures) applies to the safety, wellbeing and accommodation for all intending and current students under the age of 18. The College protects the personal safety and social wellbeing of U18 students by providing care according to our policies, procedures and processes relating to staff screening, admissions, student safety and welfare and accommodation and caregiver arrangements.

All College-based employees must hold a current and valid Working with Children Check (WWCC).

5 Application

This policy (and its procedures) applies to students who are under 18 years of age at commencement and

- (a) for the duration of their Confirmation of Appropriate Accommodation and Welfare (CAAW) arrangements and who intend to study in Australia without the care of a Department of Home Affairs (DHA) approved parent(s), legal guardian or Nominated Relative; or
- (b) who intend to study in Australia in the care of a DHA-approved parent(s), legal guardian or Nominated Relative and do not require a CAAW

until they turn 18 in an English Language Intensive Courses for Overseas Students (ELICOS) course delivered by Navitas Australia Pty Limited (formerly named Study Group Australia) (CRICOS Provider Code: 01682E) trading as Taylors College Sydney (the College) and to staff and affiliates of the College.

6 Definitions

Accommodation Providers	means the registered and approved list of accommodation providers that must meet Taylors College's minimum standards (refer to Appendix A). These include large scale residential student accommodation providers and Homestay providers
Affiliates	means consultants and contractors to the College, members of the College Committees; and any other persons appointed or engaged by the College.
CAAW	means a Confirmation of Appropriate Accommodation and Welfare letter issued by Taylors College to approve a student visa holder's welfare and accommodation arrangements while under 18 years of age and while enrolled in an ELICOS course.
Caregiver	means a person or organisation engaged by a student's parents or legal guardians to provide support and welfare services to the student in Australia, while on a student visa.
College	means Taylors College Sydney, including its staff, affiliates and contractors.
College Director	means the most senior staff member for the College (or their delegate).
CRICOS	means Commonwealth Register of Institutions and Courses for Overseas Students.
Course	means a sequence of academic subjects to achieve stated learning outcomes. An ELICOS course must have a minimum of 20 hours face-to-face scheduled course contact per week.
Critical incident	means a traumatic event, or the threat of a traumatic event, either on or off campus or on-line) that causes extreme stress, fear or injury to one or more students, such as significant disruption to the study routine (which might prevent a student from completing or continuing with the course), an emergency management situation, or threat to the safety of students and staff.

Critical incidents include but are not limited to:

- missing students
- severe verbal or physical aggression
- critical mental health episodes
- drug or alcohol abuse
- domestic violence
- physical, sexual or other abuse or assault
- death, serious injury or any threat of these
- serious accidents
- fire or natural disaster.

Delegate	means a person authorised to perform a specific responsibility.
Department of Home Affairs (DHA)	means the Australian Government department responsible for issuance of student visa and provision of student visa services (www.homeaffairs.gov.au).
eCoE	means an electronic Confirmation of Enrolment issued by Taylors College Sydney.
Education Agent	means a person or organisation (within or outside Australia) who recruits overseas students and refers them to education providers.
Enrolment	means confirmed acceptance into an AEP course where a student is progressing towards the completion of the course requirements.
ESOS Act	means the Education Services for Overseas Student Act 2000.
Homestay	means accommodation in the home of a local family.
International student/overseas student/student	means a person (whether physically located within or outside Australia) who holds or needs a visa with rights to study in Australia, and who has the right to enrol at the College.
National Code	means the National Code of Practice for Providers of Education and Training to Overseas Students 2018 made under subsection 33(1) of the Education Services for Overseas Students (ESOS) Act 2000 (Cth) . It outlines nationally consistent standards for the conduct of registered providers and the registration of their programs.
Parent/s (or Legal Guardian/s)	A student's parent/s or permanent legal guardian
PRISMS	means the Provider Registration and International Student Management System (PRISMS) reporting database, which is shared between education providers in conjunction with the Australian Department of Education and the Department of Home Affairs.
Suitable Nominated Relative	<p>Under the Australian Migration Regulations 1994 a suitable nominated relative is someone who is approved by the Commonwealth and is:</p> <ul style="list-style-type: none">• a grandparent, brother, sister, aunt, uncle, niece or nephew, or a step-grandparent, step-brother, step-sister, step-aunt, step-uncle, step-niece or step-nephew; AND• nominated by a parent of the applicant or a person who has custody of the applicant; AND <p>A suitable nominated relative must:</p> <ol style="list-style-type: none">(i) be aged at least 21; AND(ii) have the right to remain in Australia until the student's visa expires or the student turns 18 years of age (whichever happens first); AND

- (iii) be able to show that they are of good character, by providing evidence of a police clearance in the country or countries in which they have lived for more than 5 years in the past 10 years after the age of 16.

Working with Children Check (WWCC)

The Working with Children Check (WWCC) is a comprehensive criminal record check for people in child-related work in Australia. The WWCC aims to increase the safety of children in our community by helping to prevent people who have a criminal history that indicates they may harm children from working with children.

7 Records management

- (1) Records in association with this policy will be kept in accordance with the Records Management Policy and Procedures. Confidential documents related to the implementation of the policy will be maintained according to relevant privacy requirements.

8 Policy principles

- (1) An applicant must have reached the age of 16 years prior to the commencement of their Taylors College Sydney course to be eligible for admission.
- (2) Taylors College Sydney requires all students aged under 18, including students intending to travel to and study in Australia for student visa purposes and those students without a student visa, to have one of the following welfare arrangements in place or meet one of these conditions:
 - (i) supervision by a DHA-approved parent(s), legal guardian or Nominated Relative who holds a 590 guardian visa or other appropriate visa as determined by the DHA;
 - (ii) an approved CAAW that includes appropriate caregiver arrangements.
- (3) Students and their parents or legal guardian must refer to DHA's website <https://www.homeaffairs.gov.au/> for instructions on nominating a relative to provide welfare for their child in Australia and for more information on appropriate visas. When the College enrolls a student visa holder who is under the age of 18 it will:
 - (i) comply with its obligations under the National Code applicable to students aged under 18 by approving caregiver arrangements that are appropriate for a student's age, maturity, English language proficiency and other needs;
 - (ii) comply with all applicable child protection laws and child safety requirements;
 - (iii) ensure that current and valid working with children (or equivalent) checks are carried out for staff involved in providing accommodation or caregiver services to students aged under 18;
 - (iv) ensure that the accommodation providers and caregivers it engages with provide the College with evidence that they comply with Taylors College's minimum standards (refer to Appendix A);
 - (v) take immediate action to deal appropriately with reports of non-compliance with Taylors College's minimum standards (refer to Appendix A) by accommodation providers and caregivers.

9 Accommodation, support and welfare arrangements

- (1) Taylors College Sydney will only enrol students under the age of 18 if their accommodation, support and welfare arrangements meet the requirements of the DHA, the College's minimum standards and requirements, and the relevant policies and procedures.

(2) Confirmation of Appropriate Accommodation and Welfare requirements

A CAAW is required if a student under 18 intends to travel to and study in Australia for student visa purposes and not be in the care of a DHA-approved parent, legal guardian or Nominated Relative. A CAAW is not required if:

- (i) a student does not require a student visa;
- (ii) a student under 18 will be living in Australia with their DHA-approved parent(s), legal guardian or Nominated Relative

By approving a CAAW, the College does not have legal responsibility for a student. The student's parents or legal guardian remain at all times legally responsible for the student.

Where the College takes responsibility for issuing a CAAW, they will:

- (i) inform the DHA of the nominated dates for which responsibility has been accepted for approving the student's accommodation, support and general welfare arrangements;
- (ii) ensure any adults involved in or providing accommodation, homestay and caregiver services to the student have relevant Working With Children Checks (WWCC) or equivalents;
- (iii) provide students with emergency contact details and current information on how to report critical incidents and manage emergency situations, to ensure student safety and welfare;
- (iv) maintain up-to-date records of students' contact details, including the contact details of a student's parent(s), legal guardian, approved suitable relative or adult responsible for the student's welfare;
- (v) inform the DHA within 24 hours if the College is no longer able to approve the student's welfare arrangements; and
- (vi) as soon as practicable, if the student will be cared for by a DHA-approved parent, legal guardian or Nominated Relative and a CAAW is no longer required. Colleges will make arrangements to cancel the CAAW as required by the National Code.

(3) Duration of a CAAW

Approved accommodation and caregiver arrangements will normally finish when the student turns 18, 7 days after the electronic Confirmation of Enrolment (eCoE) finishes, or when a University partner or College takes responsibility for approving the student's accommodation and caregiver arrangements, whichever occurs first.

The College will approve the CAAW and issue a CAAW letter from the date of receipt of:

- (i) confirmation that the student has booked with a College-approved accommodation provider or caregiver, and
- (ii) an under 18 agreement that is signed by the student and their parent(s) or legal guardian, and
- (iii) signed accommodation and caregiver agreements that have:
 - a. the dates of stay and the provider details;
 - b. the name, address and contact information of the caregiver(s);
 - c. welfare start and end dates; and
 - d. signatures of the student, their parent(s) or legal guardian and the provider representative.

The CAAW letter must have a start date of between 7 to 14 days before the date of the student's course commencement, and depending on the student's circumstances, run for:

- (i) the same period of time as the eCoE; plus
- (ii) 7 days after the end date of the student's enrolment (or until the date they turn 18);
- (iii) no less than 7 days prior and no more than 14 days prior to the student's subsequent course commencement.

(4) Changes to accommodation and/or caregiver arrangements

College approval is needed if a student under 18, and their parent(s) or legal guardian, wishes to change their approved accommodation and/or caregiver arrangements. Colleges will notify the DHA of any changes to the CAAW, to confirm the approval of changed arrangements.

(5) Student conduct during enrolment and approved welfare arrangements

As part of acceptance of the Terms and Conditions of their enrolment, students must comply with the Taylors College Student Code of Conduct and the provisions of the under 18 agreement at all times, including while residing with approved accommodation providers.

In situations where a student under 18 breaches the Terms of Conditions of their enrolment, the Taylors College Student Code of Conduct or their approved welfare arrangements, the College Director or delegate has discretion to take appropriate action under the Progression, Exclusion and Completion Policy and Procedures. This includes, but is not limited to, suspending or cancelling a student's enrolment for non-academic misconduct.

(6) Suspension or cancellation of enrolment

If the College suspends or cancels the enrolment of a student under 18, the College will continue to approve the CAAW of the student until evidence is provided:

- (i) confirming that alternative welfare arrangements are approved by another registered provider;
- (ii) that care of the student by a parent, legal guardian, or Nominated Relative is approved by the DHA;
- (iii) that the student has left or will leave Australia,
- (iv) that the College has notified the DHA that the College is no longer able to approve the student's welfare arrangements, or
- (v) that the College has taken the required action after not being able to contact the student

(7) Minimum standards for accommodation, homestay and caregiver arrangements

A student under 18, and/or their parent(s) or legal guardian, or the student's education agent, must contact directly and book with accommodation providers or caregivers that the College has approved and registered, to ensure welfare arrangements are compliant with Taylors College Sydney's minimum standards.

The College maintains registers of approved accommodation providers and caregivers it requires students to use. This information is made available to parents and legal guardians of intending students aged under 18 seeking to apply for a student visa to study in Australia.

Welfare arrangements offered by providers must meet the minimum standards outlined in Appendix A.

As part of maintaining their registration with Taylors College Sydney, all providers are required to confirm with the College that they have appropriate arrangements to cater for students of various ages and needs and provide evidence on an agreed basis that they comply with the College's minimum standards. All student accommodation and caregiver arrangements are assessed by the College, or one of its registered accommodation service providers, for suitability prior to and during the time of a student's approved welfare arrangements.

(8) Safeguarding the welfare of students

Where there are student safety or welfare concerns during a student's enrolment at a College, the College Director or delegate will:

- (i) implement the provisions of the Taylors College Child Protection and Safeguarding Policy and Procedures; and
- (ii) in the event of a critical incident that disrupts or has the potential to disrupt the welfare arrangements of one or more students who are under 18 years of age, implement the Taylors College Critical Incidents involving Students Policy and Procedures.

10 Terminating a CAAW

(1) Transfer of a student to another education provider

If a College enrolls a student under the age of 18 who intends to transfer to a different education provider the College will assess the request according to the International Student Transfer Policy and Procedures. If the College has written confirmation that the student's parent(s) or legal guardian supports the transfer and the College agrees to release the student, the College Director or delegate will inform the student and their parent(s) or legal guardian that the new provider must:

- (i) negotiate the transfer date of accommodation, support and welfare arrangements from the College to the new provider to ensure there is no gap; and
- (ii) inform the student of their visa obligation to:
 - a. maintain their current CAAW arrangements until the agreed transfer date, or
 - b. have alternate accommodation, support and welfare arrangements approved, or
 - c. return to their home country until the start date of new approved arrangements; and
- (iii) where the student is not being cared for in Australia by a DHA-approved parent(s), legal guardian or Nominated Relative, confirm that it accepts responsibility for the approving the student's accommodation, support and general welfare arrangements in accordance with Standard 5 of the National Code.

(2) Terminating a CAAW due to other reasons

Where the College is no longer able to approve the welfare arrangements of a student for other reasons, the College Director or delegate must make all reasonable efforts to ensure that the student's parents or legal guardians are notified immediately. If the College does not approve a student's accommodation or caregiver arrangements, it must terminate the CAAW and report this to the DHA. The decision to report is made by the College Director or delegate.

A decision to terminate a CAAW and report to the DHA may be due to, but is not limited to:

- (i) a student breach of the Terms and Conditions and contract of their enrolment;
- (ii) a student refusing, leaving without notice or not maintaining their approved welfare arrangements;
- (iii) a student breach of accommodation or caregiver arrangement rules;
- (iv) a student breach of the Taylors College Student Code of Conduct;
- (v) a student's enrolment being suspended or cancelled;
- (vi) a student going missing from their accommodation and cannot be found or contacted, even after the College has implemented the Taylors College Critical Incident Policy and Procedures;
- (vii) an accommodation provider being unable to maintain welfare arrangements.

If a student will not maintain approved accommodation and caregiver arrangements after reasonable attempts have been made by a College to assist the student, the College will report to the DHA that it can no longer approve the arrangements for the student. A report to the DHA may result in cancellation of a student's visa or other action, as determined by the DHA.

11 Orientation

- (1) Taylors College Sydney provides age and culturally appropriate information to its U18 students regarding who to contact in emergency situations.
- (2) Information is provided at Orientation, which occurs at the beginning of each new course. During Orientation, students meet key staff, observe presentations and participate in a campus tour which notes the location of key staff members' offices. Students are provided with an age and culturally appropriate student handbook that lists information about who to contact in an emergency situation.
- (3) U18 students will be identified at orientation and introduced to the Under 18 Student Support Contact where monitoring procedures and accommodation rules will be explained. Each student will receive a welfare survey to complete. Any concerns will be followed up by the U18 Student Support Contact.
- (4) A student registration form is electronically provided to each student to be filled in and collected at each Orientation session or the beginning of each term, so that records of students' details are confirmed by all students in writing. Students' details include:
 - (i) the student's current residential address;
 - (ii) the student's mobile phone number (if any);
 - (iii) the student's email address (if any); and
 - (iv) any other details.
- (5) At least every 6 months, while the student remains an accepted student, the student's details are confirmed in writing and the records of students' details are updated accordingly.
- (6) New information will be added to the student management system and flagged as current.

14 General management of U18 students

(1) Attendance and Wellbeing reporting

(1.1) Teachers

Teachers must be informed by the relevant staff, that an U18 student is attending their class. Teachers will monitor the student's attendance according to the Taylors College Monitoring Student Attendance policy. If the U18 student is absent from class, the teacher is to report the absence electronically to the U18 Student Support contact who will contact the student to obtain an explanation.

Notes will be recorded on the student management system.

(1.2) On-campus U18 Student Support and Counselling

The U18 Student Support Contact:

- (i) conducts face-to-face welfare check-ins, address accommodation inquiries and concerns, and handle suspensions from approved accommodations during holiday periods.

- (ii) participates in excursions and school activities involving under-18 students, including school holiday events, class excursions, and wellbeing workshops.
- (iii) monitors attendance and contact U18 students or their caregivers/legal guardians in cases of absences, accommodation curfew breaches, or reported welfare concerns by staff or providers.

U18 students are provided with essential safety information, such as emergency contact details, international student insurance information, access to medical services, and a comprehensive understanding of the Australian healthcare system. Additionally, we facilitate access to support services, including academic assistance and counselling, to address any potential challenges during their study period.

All U18 students have access to School counsellors to meet face-to-face, via video or phone.

(1.3) Accommodation Service Providers

Accommodation Services Providers are encouraged to email the campus U18 Student Support contact weekly reporting on the wellbeing of the U18 students residing with them. If there are any issues of concern the U18 Student Support Contact will inform the Director of Student Services and Experience or delegate depending on the nature of the concern and the urgency of the action required. If the incident is classified as a Critical Incident, then the Taylors College Critical Incidents Involving Students Policy and Procedure will be followed.

(2) Conduct

Students who breach the Taylors College Student Code of Conduct, and/or break the accommodation service provider rules and who after counselling continue the same misconduct may be required to return home. The College Director or delegate will contact the student's parent, Caregiver company and agent to make arrangements for the student to return home.

The College reserves the right to expel any student whose conduct is unsatisfactory at the discretion of the College Director or delegate. A student has the right to appeal against such a decision through the Taylors College Complaints and Appeals Policy and Procedures.

Where the College suspends or cancels the enrolment of an U18 student, it must continue to approve the welfare arrangements for that student until any of the following applies:

- (i) the student has alternative welfare arrangements approved by another registered provider
- (ii) care of the student by a parent or nominated relative is approved by immigration (DHA)
- (iii) the student leaves Australia
- (iv) the College has notified immigration (DHA) under the National Code (Standard 5.3.6) that it is no longer able to approve the student's welfare arrangements or under the National Code (Standard 5.5) that it has taken the required action after not being able to contact the student.

If the student will not maintain arrangements that the College is prepared to approve, the College will report that it can no longer approve the arrangements for the student once all other attempts to assist the student to maintain appropriate arrangements have been exhausted. By notifying immigration (DHA) using the 'Non-Approval of Appropriate Accommodation/Welfare Arrangements' letter, Taylors College Sydney is reporting a breach of student visa condition 8532. This report is likely to result in cancellation of the student's visa. This reporting mechanism will only be used when a student is refusing to maintain care arrangements which

the College is able to approve. The decision to cancel a student's enrolment is made by the College Director or delegate.

(3) Critical Incidents and Mandatory Reporting with U18 students

If the College is unable to contact a student and has concerns for the student's welfare, the College will make all reasonable efforts to locate the student, including notifying the police and any other relevant Commonwealth, state or territory agencies as soon as practicable.

If an U18 student has gone missing from the approved accommodation and cannot be contacted within 24 hours, this will result in the College implementing its documented Critical Incidents Involving Students Policy and Procedure to ensure that the interests of students and their families are managed promptly and appropriately. This policy and procedure set out the clear protocol to be followed in what can be distressing and upsetting circumstances. This policy includes contacting the student's parents/guardian and filing a missing person's report with the police and/or children's services agencies. If, after a reasonable period, the student has not been found, the College will report the student's breach of their visa condition to immigration (DHA) by submitting the 'Non-Approval of Appropriate Accommodation/Welfare Arrangements' letter.

Each person working at the College has a responsibility to report harm if they know or reasonably suspect that harm is occurring, has occurred or is likely to occur to an underage student. That includes risk of an U18 student being neglected or physically, sexually or emotionally abused. This process is called mandatory reporting. In all jurisdictions, legislation protects the reporter's identity from disclosure. In addition, the legislation provides that as long as the report is made in good faith, the reporter cannot be liable in any civil, criminal or administrative proceeding.

15 Roles and responsibilities

The responsibilities undertaken by the College Director or delegated staff for the management of U18 students include (but are not limited to):

- (1) approving the appropriateness of living arrangements and/or accommodation service providers ensuring that accommodation arrangements/services engaged by the College take responsibility for the care, personal safety and welfare of these students
- (2) providing assistance, guidance, information, and warnings to students as appropriate
- (3) actively helping students with their study by mentoring, encouragement, the provision of additional assistance, career guidance as appropriate
- (4) prioritising the personal safety and welfare of students whilst attending classes or studying at Taylors College Sydney.
- (5) implementing the Taylors College Critical Incidents Involving Students Policy and Procedure and/or Mandatory reporting if required.

16 Rescissions and replacements

This document replaces the following, which are rescinded as from the date of commencement of this document:

- (1) Not applicable

NOTES

Safety, Wellbeing and Accommodation for Under-18 (U18) Students Policy and Procedures 2023

Date adopted: 20 November 2023
Date registered: 20 November 2023
Date commenced: 27 November 2023
Administrator: Position title of the most senior person responsible for the day to day operation of the policy.
Review date: At least once every 5 years from the date of commencement.

Rescinded documents: Not applicable

Related documents:

- (1) Child Protection (Working with Children) Act 2012 (NSW)
- (2) Child Protection (Working with Children) Regulation 2013 (NSW)
- (3) Children and Young Persons (Care and Protection) Act 1998
- (4) Children's Guardian Act 2019 (NSW)
- (5) Competition and Consumer Act 2010 (Cth)
- (6) Corporations Act 2001 (Cth)
- (7) Crimes Act 1900 (NSW)
- (8) Criminal Code Act 1995 (Cth)
- (9) Education Services for Overseas Students (ESOS) Act 2000 (Cth)
- (10) Education Services for Overseas Students Regulations 2019 (Cth)
- (11) ELICOS Standard 2018
- (12) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code)
- (13) Privacy Act 1988 (Cth)
- (14) Critical Incidents Involving Students Policy and Procedures
- (15) Navitas Anti-Discrimination and the Prevention of Harassment, Vilification and Bullying Policy
- (16) Navitas Code of Conduct
- (17) Navitas Police Checks and Working with Children Checks (Australia)
- (18) Records Management Policy and Procedures
- (19) Student Code of Conduct
- (20) Student Complaints and Appeals Policy and Procedures
- (21) Student Disability Policy and Procedures
- (22) Student Enrolment Terms and Conditions
- (23) Student Misconduct Policy and Procedures
- (24) Student Privacy Policy
- (25) Student Sexual Misconduct and Sexual Harassment Policy and Procedures

APPENDIX A – TAYLORS COLLEGE MINIMUM STANDARDS FOR ACCOMMODATION PROVIDERS AND CAREGIVERS

Residential accommodation provider obligations

Residential Accommodation Providers must:

- (1) advertise and promptly inform students, and their parents, legal guardian or caregiver, of all fees for the following year, including placement and boarding fees, by 30 September of the previous year;
- (2) advertise and comply with their cancellation and refund policies;
- (3) confirm a student's placement in writing to the student and the College no later than 2 weeks before the start of the student's course;
- (4) provide to each student and the College, a current and accurate residential staff directory, including an emergency point of contact;
- (5) provide a single point of contact for students under 18 that is available 24 hours a day, 7 days a week;
- (6) ensure that students are picked up and dropped off on arrival and departure days;
- (7) provide to each student age and culturally appropriate information on seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse;
- (8) notify the College and the student's caregiver of any issues in a timely manner;
 - (i) ensure that the College and the student's caregiver have access to the student's accommodation within 48 hours after the student's arrival, and at least once every 6 months thereafter, to verify that the accommodation is appropriate for the student's age and needs;
 - (ii) maintain appropriate and compulsory (guaranteed) insurance cover for the residential provider and students, as determined by the College from time to time, and in line with industry expectations.

Residential Accommodation Providers must make publicly available on the internet, policies and procedures:

- (1) explaining the fee structure and cancellation and refund policy for all payments made;
- (2) their expectations of students, including accommodation rules and room standards;
- (3) a current list of support staff and their responsibilities towards students under 18;
- (4) complaint handling processes, including provision to arrange for an alternative room, where the student's existing room is unsuitable due to a dispute or otherwise; and avenues for complaint escalation;
- (5) a copy of the proposed binding agreement to be signed by the Residential Provider, the student and their parents or legal guardian, or caregiver.

Residential Accommodation Providers must provide evidence of:

- (1) a documented and comprehensive approach to student orientation;
- (2) ongoing training for support staff of students under 18, including supporting data and training materials, regular communication and liaison with students' parents, legal guardians or caregiver;

- (3) a 24 hours, 7 days a week critical incident and phone support strategy, including procedures for follow-up action required during a critical incident;
- (4) an ongoing strategy for the management and accountability of all payments made on behalf of the student;
- (5) compliance with working with children (or equivalent) checks as per State/Territory requirements.

Within two working days of any request by the College, Residential Providers must provide:

- (1) copies of each binding agreement between the relevant student, parents or legal guardians and the residential provider, including the start and end dates for the residential arrangement. Such agreements must be dated, signed by all parties and include the residential provider contact details. The residential commencement date must be between 7 to 14 days prior to the student's arrival. The end date must not be before the student turns 18;
- (2) a complete list of all past, current and pending students under the care of the residential provider;
- (3) information regarding, but not limited to:
 - (i) student complaints;
 - (ii) critical incidents;
 - (iii) working with children (or equivalent) checks;
 - (iv) compliance.

Homestay provider obligations

The Homestay Provider must:

- (1) provide the highest possible standard of services to students in a consistent, efficient and reasonable manner, that meet the College's requirements and that are appropriate for a student's age and needs;
- (2) keep all the personal information it handles secure and confidential, including the information of students, Homestay Hosts and their household members or relatives, and as required by relevant privacy laws and College requirements;
- (3) enter into a written agreement with each Homestay Host on the terms consistent with the College's requested services;
- (4) enter into a written agreement that is agreed and signed with each student and their parents or legal guardian before the homestay accommodation is provided, which includes a start date between 7 to 14 days before the start of the student's course with Taylors College Sydney;
- (5) carry out agreed services and obligations with all due care and skill and by appropriately qualified, competent, trained and registered (as applicable) personnel
- (6) ensure that Homestay Provider personnel are appropriately trained and qualified for working with students under 18, provide ongoing training to personnel who are responsible for students under 18 and maintain documented evidence of the training;
- (7) ensure that none of the Homestay Provider personnel have been convicted of an offence that would result in disqualification under relevant State/Territory laws and requirements for working with children;
- (8) maintain current and applicable insurances, licenses, registers of State/Territory working with children (or equivalent) checks, and qualifications, and provide the College with certified copies of these before a written agreement with Taylors College Sydney is signed;
- (9) notify the College immediately if it becomes aware of any criminal convictions, charges, allegations and investigations in respect of a Homestay Host or Homestay Provider personnel member;
- (10) provide to the College within 24 hours of a College request, a current list of host families and their details, including relevant State/Territory working with children (or equivalent) checks and clearances;
- (11) make available to the College no later than September each year (or a mutually agreed date), an annual schedule of fees and charges effective 1 January the following year, which includes boarding and placement fees and confirmation that fees and charges will not increase within a calendar year.

The Homestay Provider must:

- (1) as soon as possible and no later than 7 days after receipt of a College request, recommend and make available suitable, and where applicable culturally-specific, Homestay Accommodation, including a completed inspection report;
- (2) ensure students are given age and culturally-appropriate information approved by the College on:
 - (i) who to contact in emergency situations, including contact numbers of a nominated staff member of the Homestay Provider and of the College; and
 - (ii) who to seek assistance from and who to report any incident or allegation involving actual or alleged sexual, physical or other abuse;
- (3) nominate the dates for which the Homestay Provider and Homestay Host have contractually agreed to be responsible for assisting the College in approving a student's welfare arrangements and advise the College of the dates required by the College;

- (4) ensure that Homestay Provider personnel, including the Homestay Host and relevant household members, have current and cleared working with children (or equivalent) checks as required by the relevant State/Territory jurisdiction, and maintain registers of these checks and clearances;
- (5) visit each Homestay Accommodation:
 - (i) to conduct a pre-selection inspection;
 - (ii) regularly and no less than once every six months and provide the College with inspection reports and reports on any matter requested by the College;
 - (iii) upon request by the College
 - (iv) within 24 hours in the event of an emergency;
- (6) ensure that Homestay Provider personnel and Homestay Hosts have access to Taylors College Sydney's policies relevant to students aged under 18;
- (7) conduct briefing sessions that are approved and requested by the College, with each potential and current Homestay Host on matters including, but not limited to:
 - (i) understanding the needs of students, including students under 18, most of whom are away from their home environment for the first time;
 - (ii) understanding cultural, linguistic and religious differences;
 - (iii) a flexible approach to house rules, discipline and shared responsibilities;
 - (iv) what to do if an issue arises;
 - (v) updates or changes to legislation, policies or procedures.
- (8) maintain a record of training and a register of all Homestay Hosts and their families' attendance at the training;
- (9) have implemented and documented processes for the College to verify that each student's Homestay Accommodation is appropriate to the student's age and needs and prior to the Homestay Accommodation being approved and at least every six months thereafter;
- (10) have access to the Taylors College Critical Incidents Involving Students Policy and Procedures, including the process for managing emergency situations and disruptions to a student's welfare arrangements;
- (11) maintain and provide to the College upon request, up-to-date records of the student's contact details, including:
 - (i) the student's current residential address, mobile number (if any) and email address (if any);
 - (ii) who to contact in emergency situations;
 - (iii) the contact details of the student's parent(s), legal guardian or any adult responsible for the student's welfare; and
 - (iv) any changes to those details, within seven days of the change;
- (12) advise the College within 12 hours if the Homestay Provider is no longer able to assist the College in approving a Homestay Accommodation option;
- (13) have documented policies and processes for selecting, screening and monitoring any Homestay Hosts engaged by the Homestay Provider, including with regard to organising and assessing each Homestay Accommodation option;
- (14) immediately notify the College when the Homestay Provider becomes aware that a Homestay Accommodation option is no longer available or no longer meets the College's minimum standards, and, if requested by the College, make all reasonable efforts to ensure that the student's parents or legal guardian are notified as soon as practicable;

- (15) immediately notify the College if the Homestay Provider or Homestay Host is unable to contact a student and has concerns for the student's welfare, including assisting the College in locating the student and if requested, assist in notifying the police and any other relevant State/Territory or Commonwealth agencies as soon as practicable;
- (16) where the College suspends or cancels the enrolment of a student and it notifies the Homestay Provider, the Homestay Provider must continue to make available the Homestay Accommodation placement for a student until the College notifies the Homestay Provider that the accommodation is no longer required, or any of the following applies:
 - (i) the student has alternative Homestay Accommodation approved by another registered provider;
 - (ii) care of the student by a parent, legal guardian or nominated relative is approved by the DHA;
 - (iii) the student leaves Australia.

The Homestay Provider must:

- (1) facilitate contact between each student and their assigned Homestay Host when the student arrives in Australia;
- (2) immediately inform the College of any concerns, complaints or matters raised by a student and/or a Homestay Host;
- (3) ensure that any hazards or risks are promptly investigated and, if required, promptly rectified as appropriate;
- (4) provide to the Homestay Hosts the Homestay Guidelines and any other applicable documents (as amended from time to time by the College);
- (5) ensure that the Homestay Hosts are aware of and comply with the Homestay Guidelines and all applicable laws at all times;
- (6) make available to the public online all policies, procedures and documents, which includes the responsibilities of the Homestay Provider and Homestay Host, the Homestay Provider's and Homestay Host's expectations, and avenues for students to lodge complaints and appeals;
- (7) have and implement a documented process to allow the College to access information online or in writing in relation to students, including in relation to complaints, within two working days of a request;
- (8) have and implement a documented communication plan for communication and feedback between all stakeholders, including the College, the Homestay Provider, the Homestay Hosts, students and their parents and/or guardians, and caregivers.

Caregiver obligations

The Caregiver must:

- (1) verify that each student's accommodation is appropriate to the student's age and needs, including:
 - (i) after the student's arrival at the accommodation facility/homestay, and
 - (ii) at least once every six months thereafter;
- (2) meet all students in person after their arrival at the accommodation facility/homestay;
- (3) provide a single point of contact for each student and their parents or legal guardians and provide an emergency contact number which must be answered 24 hours a day, 7 days a week;
- (4) maintain regular personal contact with the students, including:
 - (i) speaking to students once every week by telephone; and
 - (ii) meeting students fortnightly in person at the College where the student is studying;
- (5) provide 24 hour telephone advice and emergency assistance for students;
- (6) provide age and culturally appropriate information to students on:
 - (i) who to contact in emergency situations, including contact numbers; and
 - (ii) seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse;
- (7) if the caregiver is unable to contact a student and has concerns for the student's welfare, the caregiver must notify the College and make all reasonable efforts to locate the student.
- (8) provide orientation support for students, as appropriate, including:
 - (i) providing information about local public transport;
 - (ii) providing information about support services that a student can access outside of Taylors College;
 - (iii) assisting students with opening an Australian bank account, if required;
 - (iv) assisting students with obtaining an Australian SIM card or mobile data services, if required; and
 - (v) assisting students with personal problems or issues, as they arise;
- (9) send a report to each student's parents or legal guardian within 20 days of the date of the student's arrival, including:
 - (i) an overview of the student's accommodation, including photographs (if the host permits photos to be taken);
 - (ii) the student's local bank account details and how to transfer funds directly from the parent or legal guardian to the student;
 - (iii) the local mobile phone number of the student;
 - (iv) information on the general welfare of the student, including studies, transport to and from the College and how the student is settling in;
 - (v) the caregiver's full name and direct contact details of carer, including the full office address and contact numbers for the caregiver; and
 - (vi) a 24 hour emergency number for parents or legal guardians to call in the event of an emergency.
- (10) subject to obtaining the written agreement of the student's parents or legal guardians, attend parent/teacher interviews and other relevant information sessions and, if possible, provide

translated notes from parent/teacher interviews to the student's parents or legal guardians;
and

- (11) provide other support to students as required.

The Caregiver must:

- (1) liaise with students and their Homestay Provider regarding any student complaint or grievance in relation to the student's accommodation;
- (2) notify the College of any unresolved complaint or grievance in relation to the student's accommodation;
- (3) represent students in liaising with the College, including assisting students to lodge any complaint or grievance with Taylor College;
- (4) meet with the College staff member responsible for under 18 students or welfare as requested;
- (5) sign any documents that must be signed on behalf of student's parents or legal guardians.

The Caregiver must:

- (1) ensure that all of its personnel involved in providing caregiver services have current and valid working with children (or equivalent) checks appropriate to the States/Territory in which the caregiver provides the services;
- (2) have a transparent complaint handling process;
- (3) have procedures to deal with critical incidents and/or emergencies; and
- (4) explain to students the fee structure and refund policy for any payments made by a student to the caregiver.

APPENDIX B – KEY CONTACTS IN EMERGENCY SITUATIONS

Emergency contacts

- (1) In an emergency (Police, Ambulance, Fire Brigade), students should contact emergency services by dialling triple zero (**000**).
- (2) Students who feel unsafe on campus or have concerns they would like to discuss can call the emergency phone line on **+61 407 663 989** and email taylorsstudenthelp@navitas.com
- (3) Students who have experienced sexual assault can contact:
 - (i) NSW Rape Crisis Service on **1800 424 017**, 24 hours a day
 - (ii) **1800 RESPECT** on **1800 737 732** or online via www.1800respect.org.au, 24 hours a day
 - (iii) Royal Prince Alfred (RPA) Hospital Sexual Assault Service on **02 9515 9040** (Monday to Friday) or **02 9515 6111** (after hours). Counselling and medical services are available for anyone who has been sexually assaulted.

Internal contact

- (1) College Emergency Helpline **+61 407 663 989**

External contacts

- (1) NSW Police Assistance Line – contact 131 444, 24 hours a day
- (2) Department of Home Affairs – contact 131 881, 9am to 5pm, Monday to Friday
- (3) Lifeline Mental Health and Suicide Prevention – contact 13 11 14, 24 hours a day