

Policy and Procedure – Younger Overseas Students Policy

Document

Document I.D.	NES 3.15
Policy Owner	Director, Student Services and Experience
Issue Date	2 January 2018

Version Control

Issue Date:	Summary of Changes	Review Date
2 January 2018	Policy issued	2 January 2020
28.06.2019	TEQSA CRICOS renewal response update	28.06.2021

1. Purpose and Scope

Navitas English is committed to abiding by and implementing a Younger Overseas Students Policy in accordance with the National Code 2018. As such, this policy should be read in conjunction with the ELICOS National Code (2018).

This policy and procedure supports the intent of Standard 5 of the National Code and outlines the circumstances under which Navitas English Services Pty. Ltd. will ensure it meets its obligations under the revised Code (2018).

Navitas English enrolls students who are under the age of 18 into its English courses and takes responsibility for the care, welfare, support and wellbeing of all of its younger students.

This policy provides guidance on the procedures for arranging and approving accommodation, support and general welfare arrangements for students who are under 18, on a student visa (and other visa types such as Tourist and Work and Holiday visas) and who are not being cared for by a parent or suitable relative in Australia.

This policy and related procedures apply to all international students under the age of 18 who are enrolled in, or intending to enrol in, courses delivered by Navitas English Services Pty Ltd CRICOS Provider: 00289M. This policy and related procedures apply to all Navitas English staff.

2. Policy and Procedures

2.1 Compliance with relevant legislation and regulatory requirements relating to Child Protection in New South Wales (NSW), Queensland (Qld), the Northern Territory (NT) and Western Australia (WA). (NC Standard ref 5.1)

This policy complies with:

- Education Services for Overseas Students Act 2000 ESOS Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 National Code
- English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018 – Standard P2 Needs of Younger Students
- In NSW, the Children and Young Persons (Care and Protection) Act 1998
- In Qld, the Child Protection Act 1999
- In NT, the Care and Protection of Children Act (2017)
- In WA, the Children and Community Services Act (2004)

Navitas English meets the regulatory requirements of the legislative frameworks contained in the relevant codes and acts through adopting and adhering to policies and procedures that direct its approach around the guidance, care and welfare of international students under the age of 18.

Navitas English's policies, procedures and forms pertaining to younger students' care and welfare include but are not limited to;

- Navitas English Conditions of Enrolment

- NES 3.01 Policy Procedure NE homestay recruitment maintenance and arrangement review
- NES 3.02 Policy Procedure NE independent accommodation recruitment maintenance and arrangement
- NES 3.13 Policy Procedure External homestay recruitment maintenance and arrangement
- NES 3.05 Policy Procedure NE under 18 students welfare and accommodation arrangement
- NES 3.04 Policy Procedure NE carer recruitment maintenance and arrangement
- NES 6.34 Policy and Procedure: Critical Incident Management and Disruption to Welfare Arrangements involving Students Under-18
- HR 3.20 D1 Critical Incident Management Plan
- NES 3.10 Navitas English Under 18 Pathway Students
- ETP 3.08 D1 student orientation guide
- ETP 3.08 D2 Intake day process

2.2 The provision of age and culturally appropriate information. (NC Standard ref 5.2)

Navitas English provides age and culturally appropriate information to its younger students regarding who to contact in:

- emergency situations, including contact numbers of a nominated staff member and/or service provider to the registered provider
- seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse.

Information is provided at orientation, which occurs on campus every Monday for General English courses on the and on the first day of each new closed course. During orientation, students meet key staff, observe power point 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 emergency situations, including contact numbers of nominated staff members and/relevant external service providers.

Refer: Navitas English Student Handbook – Information for Under 18 Students

ETP 3.08 D1 student orientation guide

ETP 3.08 D2 Intake day process

Key contacts in emergency situations are listed as follows:

Within business hours 8.30am-5.00pm Monday-Friday

Location and contact
Principals:
NSW & Qld P: +61 2 8234 1452 NT & WA P: +61 8 9427 1467
Centre Manager and Director of Studies:

<p>Sydney: P: +61 2 8246 6854 Manly: +61 2 8234 1452 Brisbane: +61 7 3031 0500 Darwin: +61 8 8946 6160 Perth (Northern Metropolitan TAFE): +61 8 9427 1467</p>
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<p>Student Services Managers:</p>
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<p>Sydney: +61 2 9025 4727 Manly: +61 2 8234 1444 Brisbane: +61 7 3031 0500 Darwin: +61 7 3031 0500 Perth (Northern Metropolitan TAFE): P: +61 8 9427 1096</p>
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Outside business hours

- 000 for emergencies requiring the Police, Ambulance & Fire Brigade.
- 1800 NAVITAS for emergencies. This service is provided by Allianz Global Assistance and backed up by a senior staff member from Navitas who can provide additional assistance and may, at their discretion, involve the relevant senior staff member(s) listed above
- Homestay hosts also provide assistance to their students in the event of an emergency.
- 1800 814 781 Allianz Global Assistance for 24-hour information on insurance coverage in medical emergencies.

External service provider support lines

- Kids Help Line 1800 551 800 (24 hours/7 days) - counselling, information and referrals for young people
- Lifeline 13 11 14 - suicide prevention
- OSHC Doctors on demand – 1800 864 344 or via the Doctor on demand app. Video and phone consultations with a doctor
- Nurse on Call 1300 606 034
- Fair Work Ombudsman 13 13 94
- Child Protection Helpline on 132 111 (24 hours/7 days)

**2.3 Assistance with reporting incidents or allegations of abuse.
(NC Standard ref 5.2.2)**

Navitas English has:

- Zero tolerance for child abuse.
- Legal and moral obligations to contact authorities when staff have reasonable concerns about a child's safety, or reasonably believe that a child has been abused or harmed;
- Policies and procedures in place to achieve its commitments to providing a safe and nurturing environment for children in homestay and on campus.
- Stringent recruitment practices for staff and homestay hosts;

Accordingly, all allegations of abuse and safety concerns will be treated seriously and consistently within our policy framework.

Refer to:

- Refer to NES 6.34 Policy and Procedure: Critical Incident Management and Disruption to Welfare Arrangements involving Students Under-18
- HR 3.20 D1 Critical Incident Management Plan

Advice and assistance for students

Students are informed at orientation that psychological, sexual and physical abuse are never acceptable and should be reported immediately. Students are assured that their complaints will be taken seriously and assistance will be provided to ensure their ongoing safety and welfare.

All reports of alleged or actual abuse are referred to senior staff to be thoroughly and sensitively investigated, resolved and reported to authorities, as required, under Commonwealth and State legislation.

Students who experience or allege any form of abuse including the threat of abuse are asked to inform one of the following staff members:

Principals:
NSW & Qld P: +61 2 8234 1452 NT & WA P: +61 8 9427 1467
Centre Manager and Director of Studies:
Sydney: P: +61 2 8246 6854 Manly: +61 2 8234 1452 Brisbane: +61 7 3031 0500 Darwin: +61 8 8946 6160 Perth (Northern Metropolitan TAFE): +61 8 9427 1467
Student Services Managers:
Sydney: +61 2 9025 4727 Manly: +61 2 8234 1444 Brisbane: +61 7 3031 0500 Darwin: +61 7 3031 0500 Perth (Northern Metropolitan TAFE): P: +61 8 9427 1096

Counselling

Counselling is available to students who experience or allege abuse. Records associated with reports of abuse are maintained in confidential files. Where necessary, assistance with interpretation is made available to students with lower levels of English or those struggling with communicating their concerns.

Navitas English provides welfare and personal counselling for students to support them during their stay with us. Students can see the Centre Manager & Director of Studies, Student Services Manager or Senior Teacher about a range of matters related to settling into life in Australia, including homesickness, social interactions and Australian culture.

Referral to appropriate medical, legal and other support services is also provided at no cost to students.

Mandatory reporting

Child protection is a shared responsibility between Navitas English's staff, students and homestay hosts. Every Navitas English staff member and host is responsible for the care and protection of children within our joint care, including reporting information about suspected child abuse.

In Australia, state and territory governments are responsible for receiving reports of suspected child abuse and neglect from members of the public. Anyone who suspects, on reasonable grounds, that a child or young person is at risk of being abused and/or neglected should report it to the authority in their state or territory.

Navitas English acknowledges the mandatory reporting obligations and associated legislation in Australia and during orientation provides students the relevant contact details for each State and Territory (including 24-hour support). It is also made clear to staff, hosts and students on orientation/induction that you do not need to be absolutely certain that abuse or neglect of a child has occurred to call these authorities. If a student, host or staff member suspect a child is at risk of harm, it is made clear that they may call the authority to discuss their concerns. They will decide whether an investigation is required.

2.4 Nomination of dates for which Navitas English accepts responsibility for approving the student's accommodation, support and general welfare arrangements

(NC Standard ref 5.3.1)

Navitas English will accept responsibility for students who are under 18 from 7 days prior to the commencement of their course at Navitas English and for up to 7 days after the completion of their course (CoE plus 7 days), or when the student turns 18, whichever is earlier.

The nominated dates are specified in a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter which is sent to parents/legal guardians and/or agents together with the Confirmation of Enrolment (eCoE). These same forms are lodged with DIBP at the time of the visa application.

Students must not arrive in Australia before the nominated period of responsibility unless accompanied by a parent or legal guardian who assumes responsibility for the student up until the nominated period of responsibility commences.

2.5 Adults involved in or providing accommodation and welfare arrangements to students to have appropriate working with children clearances or equivalent

(NC Standard ref 5.3.2)

- Navitas English staff are required to have clean Working with Children Checks from the relevant State or Territory.
- Hosts working with younger students are required to submit clean Working with Children Checks from the relevant State or Territory.
- Details of hosts' Working with Children Checks and Police Clearance Checks from the relevant State or Territory are entered into the SMS (Student Management System) at the time a host is registered as per the Navitas English homestay recruitment maintenance and arrangement review.

2.6 Documented processes for verifying accommodation is appropriate to the student's age and needs (NC Standard 5.3.3)

The Navitas English Student Services Accommodation team works closely with younger students' families/legal guardians and agents, in advance of their arrival, to gain an understanding of their needs and preferences in order to provide appropriate homestay accommodation.

Prior to accommodation being allocated and approved, a Homestay Preferences form is completed by the student and returned to SSOs to ascertain the following.

The student's:

- Age
- Gender
- Hobbies & interests
- Previous studies
- Medical conditions
- Special needs
- Languages spoken
- Level of English
- Composition of family of origin
- Urban, regional or rural background
- Personality traits

Additionally, the student's preferences for;

- quiet or busy home
- young children, teenagers, no children
- other students
- pets (cats and dogs)
- smoking/non smoking
- single room or sharing

Navitas English maintains a detailed host database with similar categories to those above within the host's profile. This information assists staff with making informed placement decisions that take into account student maturity, needs and preferences. Through regular phone contact with hosts and close monitoring of student homestay evaluations, SSOs are able to gain a richer understanding of which hosts amongst the available host pool are more likely to suit individual student profiles.

2.7 Verifying homestay accommodation remains appropriate every six months (NC Standard ref 5.3.3.2)

Accommodation Officers (ACO) are in regular telephone contact with each of Navitas English's active hosts when placing students, updating host details, inquiring about host availability, checking on course break arrangements, or checking on student welfare and the progress of the hosting relationship.

Revisits are arranged whenever hosts move houses, make changes to the lay-out of their existing properties or when an inquiry is received that requires a home visit. Revisits may also occur when ACOs or hosts request them, following breaks from or disruptions to, hosting and following complaints or concerns being raised by students, parents or agents.

In the case of homestay families that host under 18 students, the SSM is to verify every 6 months that the accommodation is appropriate to the student's age and physical needs by:

- (a) undertaking a physical site visit to verify the accommodation is appropriate prior to the accommodation being approved and:
- (b) at least every 6 months thereafter by conducting subsequent physical site visits
- (c) Additional to the verification processes of homestay families that host under 18 students in (a) and (b), Navitas English also conduct the following processes which enable further ongoing verification that the accommodation is appropriate for under 18 students:
 - (i) any under 18 student at Navitas English is assigned an *independent* Carer (meaning, the Carer is not employed by Navitas English in any other capacity other than as a Carer nor is a member of the Homestay Family to which the student resides, including if the student is placed in with an external accommodation provider) and if the student is not living with a Parent or Legal Custodian or living with a DHA approved relative.

The Carer's obligation as per the NES 3.04 D1 Carer Agreement is to contact the student and Homestay Family (whether a Navitas English homestay family or external accommodation provider) at least once a week to verify that the student is well and that their living and welfare arrangements remain appropriate. This is reported back to the SSM/ACO by the Carer on a weekly basis as per the obligation set out in the Carer Agreement. The Carer must also meet with the student in person at least once per fortnight to check upon their welfare
 - (ii) all students residing with a homestay organised by Navitas English are asked to complete a homestay feedback questionnaire to provide feedback about their homestay experience during their stay. This is assessed and filed by the SSM/ACO who is able to follow up on any notable feedback made by the student. The student is also asked to provide a rating regarding their experience which is collated by the SSM/ACO for quality control purposes in addition to Navitas English's online student survey which is undertaken by all students every 3 months
 - (iii) all Navitas English students undertake a student survey every 3 months whereby they are asked to rate and provide feedback on their accommodation if organised by Navitas English. This feedback is presented back to the SSM/ACO for quality control purposes

In addition to the above, hosts are encouraged to telephone or email the ACOs or Student Services Manager (SSM) the relevant centre should they have any concerns they may have about students in their care. Regular communications allow staff to keep close tabs on active hosts and resolve misunderstandings and intercultural issues within the hosting relationships as they arise.

Students have access to ACOs in each centre between 9am-5pm Monday to Friday to discuss any concerns that they may have with regard to homestay. Students also have on-campus access to counselling and other advice during business hours. Outside business hours, students (and hosts) are asked to call the 1800 NAVITAS student assistance line for advice and assistance.

Refer to:

Policy and Procedure Homestay Recruitment, Maintenance and Arrangement (NES 3.01)

Policy and Procedure External homestay recruitment maintenance and arrangement (NES 3.13)

Policy and Procedure Independent Accommodation Provider Recruitment, Maintenance and Arrangement (NES 3.02)

2.8 Critical incidents and processes for managing emergency situations when the welfare arrangements of students under 18 are disrupted (NC Standard 5.3.4)

Examples of critical incidents may include but are not limited to: a student going missing from their approved accommodation; the death of, or serious injury of, a student; a student being the victim of serious crime, or the student being the victim of physical, sexual or psychological abuse. If a student who is under 18, is involved in a critical incident, the Navitas English Critical Incident Policy for international students will be enacted.

If a student is missing from their Navitas English centre or the approved homestay accommodation and cannot be found after 24 hours despite implementation of the Navitas Critical Incident Policy, the details will be reported to the DIBP through its Student Integrity Unit and related information will be entered into PRISMS.

In the event that the hosting relationship with a student who is under 18 and holds a Navitas English CAAW, is disrupted due to an emergency or critical incident (health, mental health, environmental, abuse, crime or another problem) students and hosts are instructed to contact the Student Services team in their centre without delay so immediate assistance can be provided.

Student Services will endeavour to organise emergency accommodation that provides for safety and welfare of an under 18 student, either until the situation can be resolved, or until an alternative homestay placement can be made.

When a disruption to welfare arrangements occurs outside business hours, hosts and/or students are asked to call the 1800 NAVITAS student assistance line for advice and assistance. Possible available options include:

- temporary placement with an alternative Navitas English host if there is a space available;
- temporary placement in an alternative homestay arranged via an external homestay provider;
- temporary placement with a friend, family friend or relative approved by the 1800 NAVITAS emergency phone contact.

Refer to:

Policy and Procedure: Critical Incident Management and Disruption to Welfare Arrangements involving Students Under-18 (NES 6.34)

Critical Incident Management Plan (HR 3.20 D1)

2.9 Unstable and threatening student behaviours in homestay

Navitas English acknowledges its duty of care to hosts as well as students. If a student's behaviour is threatening, or is judged too unstable psychologically for the host to cope with, the Emergency Planning Committee (EPC) as per the Critical Incident policy and/or the police may be called on to assess the situation and may direct what occurs next.

In these circumstances, the host and the student and any third parties involved are asked to contact Navitas English staff or the 1800 NAVITAS student assistance line so the student's parents/legal guardians can be informed without delay. Staff will then consider the future implications for the student and host.

Temporary placement into a mental health or other secure facility arranged by the EPC or police may occur if it is deemed to be necessary. If a younger student is detained, Navitas English will provide information and support to the parents/legal guardian and ongoing support to the student as advised and deemed appropriate.

Whenever there is a disruption to a younger students welfare arrangements, every effort will be made to communicate with all necessary parties to secure the students' ongoing safety and welfare arrangements without further delay.

2.10 Maintenance of up-to-date contact details for students, parents, hosts, legal guardians and any adult responsible for the student's welfare (NC Standard ref 5.3.5).

- Students are asked to notify Student Services of any changes they make to their contact details **as soon as** new details are known, but no later than within 7 days (as per the National Code). This request is both in the Student Handbook and in the Day One presentation as part of orientation.
- Contact details for the parents of younger students are provided to Student Services at the time of enrolment and noted in the SMS.
- Additional contact details for any responsible adult that the parents would like listed on the student's record are collected at Registration or soon after the student's commencement at Navitas English.
- Following registration and reconfirmation that each student's contact details are correct, an upload is made to PRISMS.

- Contact details for students who are living with a DIBP approved 'suitable relative' are collected at the time of enrolment and checked at the commencement of the student's studies.
- Contact details for homestay hosts are provided to students and their families prior to their arrival. All host details are recorded in the SMS.
- Students who wish to change homestay are assisted by SSOs. Changed details are recorded in the SMS.
- All students are required every 5 weeks to confirm that their contact details in the SMS are current and correct. Updates notified by the student are uploaded into the SMS.

2.11 Early notification to DIBP of changes to U18 students' welfare arrangements (NC Standard ref 5.3.6)

Circumstances requiring changes to the welfare arrangements of younger students include:

1. Navitas English receives appropriate confirmation that the student will be cared for by a parent or suitable relative approved by DIBP;
2. The parents/guardians inform Navitas English that the student is transferring into the care of another provider who will approve the student's welfare arrangements;
3. The students' parents or guardians request the cancellation of the student's enrolment in order that the student leaves Australia and/or returns home.

In each of the above circumstances, Navitas English will inform DIBP as soon as is practicable after receiving confirmation from the parents/legal guardians that there has been or will be a change to a younger students' welfare arrangements. Changes will be reported via PRISMS.

For (5. & 6. below) please see 5.4 of this policy.

4. Navitas English cancels the student's enrolment;
5. Navitas English is no longer able to approve the students' welfare arrangements;

2.12 Screening and monitoring of third parties engaged to organise and assess welfare and accommodation arrangements (NC Standard ref 5.3.7)

Navitas English has a long-standing relationship with external homestay providers who provide homestays for students during peak enrolments periods.

Navitas English only engages with third parties who also provide high quality accommodation and supervision for younger students and whose own policy and procedure meet all obligations as is required under the National Code 2018 and in its contract with Navitas English. To this end, Navitas English staff work closely with contracted external homestay providers to ensure that together we meet the obligations for duty of care (especially with respect to U18 students) under the new National Code 2018.

Navitas English staff and external homestay provider staff liaise on a regular basis to; ensure the welfare and support provided to younger students is adequate; jointly investigate any problems or complaints involving third party hosts; share information from student evaluations of their hosting experience; to discuss compliance and related issues.

Navitas English SSOs evaluate all external placements for suitability before confirming placements with the students and their families/legal guardians and agents. Navitas English does not place students into homes that Navitas English SSOs deem inappropriate to the student's needs. In the case of external homestay providers who host under 18 students, the SSM will also check that and the student's accommodation is appropriate to the student's age and physical needs every 6 months.

2.13 Early notification to parents of changes to students' welfare arrangements (NC Standard ref 5.4)

In the event that Navitas English cancels the enrolment of a student who is under 18 , or is no longer able to approve a student who is under 18's welfare arrangements, Navitas English will inform the student's parents/legal guardian/agent without delay and within 24 hours.

2.14 Reasonable efforts to locate uncontactable students (NC Standard ref 5.5)

As per the *Policy and Procedure 9.01: Student Attendance*, if during the recording of attendance the class teacher identifies the below situations, then they must follow the stated procedure:

Situation	Procedure
Over 18 student absent for 3 consecutive days	<ol style="list-style-type: none"> 1. ST/Teacher phones the student 2. ST records date of phone call in SMS 3. ST notifies the CM-DoS if unable to make contact 4. CM-DoS emails the student and records correspondence in SMS 5. If required the CM-DoS contacts the students agent/emergency contact
Under 18 student absent for 1 day	<ol style="list-style-type: none"> 1. ST/Teacher phones the student 2. ST records date of phone call in SMS 3. ST notifies the CM-DoS and SSM if unable to make contact 4. CM-DoS contacts the students carer and/or homestay family to discuss absence and records correspondence in SMS 5. If required the CM-DoS will contact the students' parents, carer, agent and emergency contact

As outlined above, in the event that Navitas English is unable to contact a younger student and has concerns for the student's welfare, Navitas English will make all reasonable efforts to locate the student including contacting the host, friends of the student, family/legal guardians, and notifying the police and any other relevant Commonwealth, State or Territory agencies as soon as is practicable.

Hosts who are unable to contact a younger student, who have concerns for the student's welfare, are directed to contact Navitas English staff during business hours, the 1800 NAVITAS emergency number outside business hours, and the police as appropriate.

Refer to:

Policy and Procedure: Critical Incident Management and Disruption to Welfare Arrangements involving Students Under-18 (NES 6.34)

Critical Incident Management Plan (HR 3.20 D1)

2.15 Non-arrivals

Student non-arrivals are followed-up after Registration Day and again after the first day of each new course. Students scheduled to arrive but confirmed as having not arrived are checked against DHA visa grants by Admissions staff.

- In circumstances where a student's visa has not been granted, an email is sent to the parent/legal guardian or agent, requesting an update on the student's circumstances and expected arrival date. Delayed visa grants are noted in the SMS.
- In circumstances where a student under the age of 18 and on a Navitas English CAAW has had their visa granted but failed to attend Registration and/or the first day of their course, further investigation within the SMS airport tab and homestay tab is made. If there is evidence of the student's arrival, efforts are made to contact the student. If there is no evidence of the student's arrival, an email is sent to the parents/legal guardian or agent inquiring as to why the student has not arrived. Students are then monitored either until they arrive or until they cancel their enrolment.
- If any registered Navitas English APU, is unsuccessful in collecting a student at the airport who is scheduled to arrive, APU staff contact Navitas English Student Services in the relevant centre without delay during business hours (Monday- Friday 8.30am- 5.00pm) or the 1800 NAVITAS number (outside business hours).
- If a younger student fails to arrive at their allocated homestay as scheduled, hosts are required to telephone Navitas English Student Services staff without delay (during business hours) or the 1800 NAVITAS number (outside business hours) and report the student as missing.

Refer: Admissions_Procedures/Process – Non Arrivals

2.16 Suspension, deferral, withdrawal or cancellation of an Under 18 student's enrolment (NC Standard ref 5.6)

Navitas English reserves the right to suspend or cancel an overseas student's enrolment for reasons outlined on the Navitas English Conditions and Enrolments. The student may need to withdraw from or defer their course such as in cases of extenuating or compelling circumstance and as outlined in the Navitas English Conditions and Enrolments.

In the event of such a suspension, deferral, withdrawal or cancellation of a student on a student visa who is U18, Navitas English will continue to approve the welfare arrangements of the student until any of the following applies:

- The student has alternative welfare arrangements approved by another registered provider

- Care of the student by a parent or nominated relative is approved by Immigration
- The student leaves Australia and under the supervision of Navitas English
- Navitas English 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

The relevant centre SSM and in conjunction with the DSSE, is responsible in the coordination of and implementation of the above.

Refer to: Policy Procedure Student Deferral, Suspension, Withdrawal and Refund (NES 2.10)

2.17 Transferring welfare arrangements for U18 students- Negotiating welfare transfer dates to ensure no gaps (NC Standard ref 5.7.1)

Navitas English is regularly approached to enrol students already living in Australia and studying with other providers, who for a variety of reasons, wish to transfer. In these circumstances, Navitas English contacts the releasing provider to gain an understanding of the reasons why the student wishes to transfer. If a transfer is considered to be in the student's best interest, arrangements are made to ensure there is no gap in the student's accommodation, support and welfare arrangements.

Where the student is required to move from their current accommodation to a Navitas English approved homestay, Student Services will communicate with all relevant parties to arrange transportation and transfer. A host profile including contact details and change-over dates will be sent to parents/guardians and agents to sign off on in advance of the move occurring.

2.18 Reminding younger students about visa obligations and transfer dates for new approved welfare arrangements (NC Standard ref. 5.7.2).

Where Navitas English has enrolled a student under 18 years of age who has welfare arrangements approved by another provider, it is the responsibility of the receiving provider (i.e. the secondary school/college) to negotiate with Navitas English as the releasing provider to ensure that there are no welfare gaps.

To assist with this process, Navitas English notifies its hosts that their contact details may be shared with staff from their host student's future secondary school, in order to ensure a seamless transfer.

Other policy areas relevant to younger students studying at Navitas English

Course materials, tutoring and operations

Where Navitas English enrolls students under the age of 18, Navitas ensures its operations are appropriate for the age, maturity and English language proficiency of the student(s). This includes course materials and tutoring being tailored to meet student learning requirements, taking into account their differing levels of age and maturity.

This policy is made clear to all new employees on induction during their orientation as well as part of the delivery of regular professional development to all staff.

3. Responsibilities

The **DSSE** is responsible for:

- Overall implementation of the National Code Standard 5
- Overall guidelines on this policy and those that are related to student support services
- Authoritative decisions on issues related to the policies outlined above

The **SSMs** are responsible for:

- Monitoring and proper application of these procedures including homestay and carer recruitment and accommodation inspections or the reporting of as per the related policies
- Interviewing student and contacting agent (if required, in consultation with relevant Market Manager) about Transfer Between Provider Request
- Providing detailed information to the Admissions team as described in relevant Policy and Procedure, using Change of Provider Form
- Providing a homestay questionnaire feedback form to all students residing in a homestay to garner feedback and to assess and evaluate all student feedback relating to student services and Navitas English arranged accommodation on the quarterly online evaluations
- Receiving the weekly Carer's report and following up on any notable items

Carers are responsible for:

- Tracking the welfare of an under 18 student as per the Carer Agreement and to whom they are assigned to if the student does not reside with a Parent, Legal Custodian or a DIBP approved relative. The Carer is obliged to contact both the underage student and the homestay parent(s) where the student resides weekly to check on the welfare of the student and to act as a contact for the student should they need any assistance or guidance.
- The Carer is responsible for reporting back to the SSM on a weekly basis to update of the welfare of the student they have been assigned to and as per the weekly contact they maintain with student and homestay. The Carer must also meet with the student in person at least once per fortnight to check upon their welfare.

Navitas English Approved Homestay Families are responsible for:

- The care of students whilst they reside with them and under the prior agreed arrangements and conditions such as providing the agreed number of meals per week. The Homestay Family must respond to the weekly communications with the Carer (if the student has been assigned a Carer and if under 18) as per the Carer obligations in NES 3.04 D1 Carer Agreement
- Homestay families are requested to contact the Carer and the SSM if there are any issues with the student they are hosting if the matter is more immediate than what can be communicated via the weekly Carer check in (phone call) and subsequent Carer's weekly report to the SSM

Admissions staff are responsible for:

- Proper application of these procedures
- Filling of all documentation relating to these procedures

- Recording welfare arrangements in PRISMS under delegated authority from the PEO

Market Manager are responsible for:

- Liaison with agents, as applicable, including in ascertaining agents position with respect to accommodation and welfare arrangements for students under the age of 18.

The Principal(s), Centre Managers & Directors of Studies, Student Services Managers and the Student Services teams, are responsible for the implementation of Standard 5 of the National Code.

The core Student Services teams consist of the following staff members:

- Student Services Manager
- Student Services Officer(s)
- Student Services Officer (Accommodation)
- Activity Coordinator

4. Definitions

CRICOS	: Commonwealth Register of Institutions and Courses for Overseas Students
DHA	: Department of Home Affairs
eBECAS	: Student & host records management system
ESOS Act 2000	: The Education Services for Overseas Students Act 2000.
National Code 2018	: The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Student 2018.
Principal Course	: The final or highest level of study to be undertaken by student
DSSE	: Director, Student services & Experience
SSOs	: Senior Services Officers
SSM	: Student Services Manager

5. Review

This template document is reviewed every 2 years by the relevant manager to ensure alignment to appropriate strategic direction and its continued relevance to Navitas English's current and planned operations.

The next scheduled review of this document is listed in the Version Control section on Page 1.

6. Compliance

This policy complies with;

- Education Services for Overseas Students Act 2000 [ESOS Act 2000](#)
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 [National Code](#)
- English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018 – Standard P2 Needs of Younger Students.

Navitas English meets the regulatory requirements of the legislative frameworks contained in the relevant codes and acts through adopting and adhering to policies and procedures that direct its approach around the guidance, care and welfare of international students under the age of 18.

7. Related documents

Policy and Procedure Homestay Recruitment, Maintenance and Arrangement (NES 3.01)

Policy and Procedure External homestay recruitment maintenance and arrangement (NES 3.13)

Policy and Procedure Carer Recruitment, Maintenance and Arrangement (NES 3.04)

Policy and Procedure Under 18 Students Welfare and Accommodation Arrangement (NES 8.02)

Policy and Procedure Independent Accommodation Provider Recruitment, Maintenance and Arrangement (NES 3.02)

Policy and Procedure: Critical Incident Management and Disruption to Welfare Arrangements involving Students Under-18 (NES 6.34)

Critical Incident Management Plan (HR 3.20 D1)

Under 18 Procedure: Under 18 Flowcharts (NES 8.02 D1)

Under 18 Pathway Students (NES 8.03)

Policy Procedure Student Deferral, Suspension, Withdrawal and Refund (NES 2.10)

Policy and Procedure Transfer Between Registered Providers (NES 2.20)

Transfer Between Registered Providers - Student Guidelines (NES 2.20 D1)

Change of Provider Form (NES 2.20 F1)

Carer Agreement (NES 3.04 D1)