



Hawthorn

Melbourne

Under 18 Students Policy and Procedure

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Document Properties

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Contents

1. Purpose	3
2. Scope	3
3. Carer Accommodation and Welfare arrangements	4
4. Homestay accommodation arrangements	5
5. Safety, wellbeing, contact and reporting provisions	8
6. Working with Children Check (WWCC) Management	12
7. Under 18 critical incident management	12
8. Changes to under 18 student welfare arrangements	13
9. Study and course related matters	15
10. Under 18 non-student visa holders and group study tours	15
11. Responsibilities	16
12. Definitions	17
13. Compliance	17
14. Related documents	18
15. Review	18

1. Purpose

This policy and procedure document outlines Hawthorn-Melbourne's obligations in the support of the enrolment and welfare for international students under the age of 18 during their study period.

Hawthorn-Melbourne 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 National Code.

This policy and procedure document supports the intent of *Standard 5* of the National Code and outlines the circumstances under which Hawthorn Learning Pty. Ltd. trading as Hawthorn-Melbourne will ensure it meets its obligations.

In addition, this policy and procedure document is committed to abiding by the:

- Education Services for Overseas Students Act 2000 [ESOS Act 2000](#)
- English Language Intensive Courses for Overseas Students (ELICOS) [Standards 2018](#) – Standard P2 Needs of Younger Student
- Commonwealth [Child Safe Framework](#)
- Child Safe Standards, Victoria [Child Safe Standards Victoria](#)

2. Scope

This policy and procedure document refers to all international students enrolled, or intending to enrol, in any of Hawthorn-Melbourne's courses (CRICOS Provider: 02931G) who are under 18 years of age at their course commencement date, and to all Hawthorn-Melbourne staff.

Students enrolling for our English for High School (EfHS) program must be within a year of Victorian high school age (i.e. 11 and above) at the time of commencement. An age limit of 14 applies for study tour groups requiring homestay arrangements. For students enrolling in other 'mainstream' courses (i.e. non-EfHS) at Hawthorn-Melbourne, a minimum age of 16 at the time of commencement applies.

For all Under 18 international students and Hawthorn-Melbourne staff, this Policy and Procedure document outlines:

1. Carer Accommodation and Welfare arrangements
2. Homestay accommodation arrangements
3. Safety, wellbeing and contact and reporting provisions
4. Working with Children Check (WWCC) management
5. Under 18 critical incident management
6. Changes to Under 18 welfare arrangements
7. Study and course related matters
8. Under 18 non-student visa holders and group study tours

3. Carer Accommodation and Welfare arrangements

Applications received by Hawthorn-Melbourne for students under the age of 18 years must be signed by their parent/s or legal guardian/s.

In addition to the Letter of Offer / Written Agreement, Hawthorn-Melbourne collects required information on living and welfare arrangements by issuing the *Accommodation and Welfare Arrangements for Students Under 18 Years of Age form*. The parent/legal guardian must complete and return this document to Hawthorn-Melbourne when accepting the offer. There are two versions of this form – ‘Version A’ for students aged 14-17 and ‘Version B’ for those aged 11-13.

Version A (14-17 year olds)

All students aged **14 to 17 years** of age must live in accommodation approved either by the Department of Home Affairs or by Hawthorn-Melbourne. Therefore, Version A presents the below options and fields to complete:

Section 1: Carer, Accommodation and Welfare nomination options for students aged **14 to 17 years**. Parents/legal guardians select:

1.1 Under 18 student to live with a parent, legal guardian or suitable relative approved the Department of Home Affairs,

or,

1.2 Under 18 student to live in a homestay approved by Hawthorn-Melbourne,

or,

1.3 Under 18 student to live with a family friend/relative as the homestay as approved by Hawthorn-Melbourne.

Section 2: Collection of Parent Contact Details in home country and within Australia if applicable.

Section 3: Declaration relating to accommodation, medical treatment and indemnity.

Section 4a: Declaration: Living with a parent or suitable relative approved by the Department of Home Affairs.

Section 4b: Declaration: Living in a homestay approved by Hawthorn-Melbourne.

Section 4c: Declaration: Living with a family friend/relative as the homestay and as approved by Hawthorn-Melbourne.

All Under 18 students under Section 4b:

- must be met at the airport and transported to their homestay by an approved service.
- if enrolled in English for High School, will be placed in homestay accommodation in partnership with the Australian Homestay Network, AHN.
- enrolled in other Hawthorn-Melbourne courses other than English for High School will be placed in homestay accommodation arranged directly by Hawthorn-Melbourne – Student Services.

Version B (11-13 Year Olds)

Version B of the form is largely the same as Version A. However, as students aged **11 to 13 years** must live in accommodation approved by the Department of Home Affairs, homestay is not an option. Therefore, information related to homestay and airport transfer is removed from this version of the form (i.e. 1.2, 1.3, 4b and 4c).

Confirmation of Appropriate Carer, Accommodation and Welfare arrangements (CAAW)

The CAAW is generated by Hawthorn-Melbourne at the same time as the CoE for those students electing to be placed in an approved homestay (14-17 year-olds only). Hawthorn-Melbourne accepts responsibility for these students 7 days prior to the course commencement date and 7 days after the completion date of the course, or, until the student turns 18 years of age, whichever occurs first.

Students must not arrive in Australia before the nominated commencement date as noted on the CAAW unless accompanied by a parent or legal guardian who assumes responsibility for the student up until the start date of the CAAW.

Non-Arrivals

Student visa grants are monitored daily. An email is sent to all students one week prior to the commencement date of the course as a reminder of the date and time to attend registration and orientation prior to commencing their course.

In circumstances where the student visa has not been granted, an email is sent to the agent / parent / legal guardian requesting an update on the visa application process. In some cases, this may result in a request to defer the start date of the course, or, in the event the visa is granted at the last minute, Hawthorn-Melbourne may allow the student to arrive one week late to join the class.

In circumstances where the student visa has been granted and the student does not arrive on campus to attend registration and orientation prior to the commencement of the course, Hawthorn-Melbourne contacts the agent and parent/legal guardian requesting the reason for the non-attendance and the student's expected arrival date. The agent and parent/legal guardian are advised that failure to commence the course, or failure to respond within 5 working days, may result in Hawthorn-Melbourne reporting 'non-commencement of studies' on the CoE which will result in the cancellation of the CoE and CAAW. In this instance, once actioned, the agent and parent/legal guardian are advised to contact the Department of Home Affairs for advice on how this action may impact the student's visa. For those students holding a packaged student visa, for example, with a Victorian high school, Hawthorn-Melbourne will notify the appropriate education provider of this outcome.

4. Homestay accommodation arrangements

Hawthorn-Melbourne partners with reputable third-party providers to supply homestay accommodation with local families.

Homestay agreements outline commitments between parties in alignment with the National Code 2018 - Standard 5 and ELICOS Standards P2 – Younger Students. Irrespective of the involvement of these third parties, Hawthorn-Melbourne accepts responsibility for the welfare of under 18 students in line with the terms of the National Code 2018.

4.1 Selecting, screening, and monitoring third parties providing homestays to Under 18s

Upon signing a homestay agreement with a third party, and during the life of the partnership, Hawthorn-Melbourne undertakes the following measures to ensure that accommodation provided remains with regulatory requirements:

- Hawthorn-Melbourne checks that partner policies & procedures comply with all obligations as required under the ESOS regulatory frameworks such as the National Code 2018 and are compatible with Hawthorn-Melbourne policies.
- Hawthorn-Melbourne maintains an updated homestay agreement which outlines a shared understanding of commitments by both parties to uphold the above-mentioned obligations and sets out agreed procedures in light of any regularly changes.
- Hawthorn-Melbourne retains shared access to all relevant information such as family and student profiles and contact and payment details.
- Hawthorn-Melbourne assesses both reputational and qualitative feedback from its stakeholders, such as its agent network and from students themselves, who are encouraged to provide feedback on their experience to our Student Services team, and in quarterly student online evaluations.
- External endorsement is taken into account with such stakeholders as English Australia and NEAS.

Hawthorn-Melbourne staff and 3rd party 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.

Hawthorn-Melbourne's SSOs have access to homestay placement reports and essential details held on the third-party provider's database. This includes details of all the family members and when the homestay was last inspected by the third party. Family WWCCs can be requested at any time by Hawthorn-Melbourne for verification.

Example: AHN's policies are listed on their website and here: [AHN public policies](#)

4.2 Ensuring accommodation is suitable for UNDER 18s

Prior to homestay accommodation being approved and arranged, a homestay request form is completed by the student's parents to ascertain the following:

- Name, gender and date of birth of the student
- Their hobbies & interests
- Language(s) spoken
- Level of interaction they would prefer with the family
- Willingness to live with children under 18 and with pets
- To provide any allergies and/or medical conditions
- To provide any special dietary requirements
- To provide any special requests (or other preferences) they have

In the case of third-party providers of homestay accommodation, once the most suitable homestay family match is found according to the student's preference form, a placement report is created and provided to the relevant SSO to review. The placement report includes the following key information:

- Host families' names, ages, gender, and relationship (e.g. mother, son)
- Homestay language spoken, the address and contact information
- Student's expected arrival time and flight detail
- Details of any other students staying with the family
- Transport information and distance/time from school
- The date the homestay was last inspected
- Photographs of the rooms & facilities in the house

The placement report also contains a biography of the student, their hobbies & interests and detail of any dietary or special requirements. Both Hawthorn-Melbourne and the student/parent/legal guardian may direct the third-party provider to find an alternative family should there be reasonable grounds for them to do so.

4.3 Ensuring suitability of accommodation for UNDER 18s every six months

In line with the National Code Standard 5, Hawthorn-Melbourne Student Services and third-party providers of accommodation have documented procedures to ensure suitability of accommodation for Under 18 students every six months. These procedures include but are not limited to regular contact with 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 or virtual inspections are arranged whenever hosts move houses, make changes to the layout of their existing properties or when an inquiry is received that requires a home visit. Revisits may occur when SSOs 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 interval between home visits, hosts are encouraged to telephone or email Student Services or the English for High School Coordinator or third-party accommodation providers with any concerns they may have about students in their care. Regular communications between Student Services and third-party accommodation providers and other stakeholders allow Hawthorn-Melbourne to closely monitor active hosts and resolve misunderstandings and intercultural issues within the hosting relationships as they arise.

Students have access to Student Services staff, the English for High School Coordinator and the Director of Studies: General Programs, between 9am-5pm Monday to Friday to discuss any concerns that they may have regarding homestay. Students also have on-campus access to counselling and other advice during business hours.

5. Safety, wellbeing, contact and reporting provisions

Hawthorn-Melbourne provides age and culturally appropriate information to under 18 students regarding who to contact in:

- emergency situations, including contact numbers of a nominated staff member and relevant partner organisations.
- seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse.

This information is provided via orientation activities and in the Student Handbook, which is available for current students on the LMS homepage, and on the Hawthorn-Melbourne website for prospective students.

During business hours

Included in the Student Handbook are the full names and email addresses of key centre staff and a contact number for the main reception/Student Services.

Outside business hours

- 000 for serious emergencies requiring the Police, Ambulance & Fire Brigade (e.g. serious injury, significant crime, house fire).
- 1800 NAVITAS for other emergencies (e.g. lost house keys, serious homestay or family concerns). This service is provided by Allianz Global Assistance and backed up by a senior staff member from Hawthorn-Melbourne who can provide additional assistance.
- 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 814 781 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 13 12 78(24 hours/7 days)

Assistance for students

Hawthorn-Melbourne Student Services are usually the first point of contact for a range of matters related to settling into life in Australia, including homesickness, social interactions and Australian culture.

Hawthorn-Melbourne employs suitably qualified Student Services staff and provides them with training in key areas such as customer service, first aid and supporting student welfare. These staff share information on in-house and external resources that students can access depending on the nature and severity of the issues they are facing, and can facilitate referrals to expert support at no cost to the student. Hawthorn-Melbourne partners with Study Melbourne and Partners in Wellbeing to ensure students can get advice from appropriately qualified professionals in a language of their preference.

Other staff likely to serve as escalation points for students presenting welfare issues, such as the Director of Studies, EfHS Coordinator or a Senior Teachers, are also provided with training to assist students within the limits of their expertise.

Students are assured that any complaints will be taken seriously, and assistance will be provided to ensure their ongoing safety and welfare.

Child Abuse

Hawthorn-Melbourne 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

Accordingly, all allegations of abuse and safety concerns will be treated seriously and consistently within our policy framework. All reports of alleged or actual abuse are referred to the Hawthorn-Melbourne primary contacts - as described in the [Hawthorn-Melbourne Critical Incident Policy and Procedure](#) - to be thoroughly and sensitively investigated resolved, and reported to authorities as required (see **Mandatory reporting**).

Counselling is made 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.

Mandatory reporting

For under 18 students living in Hawthorn-Melbourne-organised accommodation, with Hawthorn-Melbourne providing support and general welfare, Hawthorn-Melbourne is ultimately responsible for ensuring that its staff, students, carers and any third-party homestay providers are aware of mandatory reporting legislation and have the relevant state contact information to report suspected child abuse (including physical abuse, sexual abuse, emotional abuse, neglect, and exposure to family violence).

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. If a student or staff member suspects a child is at risk of harm, it is made clear that they may call the authority to discuss their concerns. The authority will then decide whether an investigation is required.

Hawthorn-Melbourne communicates mandatory reporting to:

- all students in day one orientation and in the student handbooks
- all staff during onboarding, including via the teacher handbook
- as all homestay hosts via Homestay Host Agreements

Example evidence: Our primary homestay providers for our English for High School program, AHN, has a publicly available [sexual harassment and abuse prevention policy](#).

Absences from school and homestay process

Hawthorn-Melbourne has a strict procedure for monitoring under 18 student school absences as follows. Students are required to notify H-M of absences via email as soon as practicable, including full name, student number, class number and reasons for absence. Students are informed of this procedure at orientation.

In the event a student is absent, and we have not received any formal notice, the following steps are taken:

1. Teachers notify Student Services staff and/or the EfHS Coordinator if student is absent from class before the morning break (10.20am).
2. Upon notification, SSO/EfHS Coordinator will email or call the student and/or registered contact as soon as practicable to check welfare and to seek clarification about the student's absence, requesting response within the working day (i.e. first day of absence). Further calls will be made throughout the day if no immediate response is received.

3. If the student is not on campus for a second consecutive day and we have received no satisfactory communication regarding the student's whereabouts and safety, the SSO/EfHS Coordinator will email *and* call the student and/or registered contact, requiring an immediate response. Within this, they must make it apparent that the school may decide to contact Police to report the student as a missing person if we cannot get confirmation of their whereabouts and safety within the same working day (i.e. 2nd day of absence).
4. If no satisfactory response has been received within the 2nd day of absence, and all reasonable points of contact have been exhausted (e.g. the carer, the parent or legal guardian, a homestay parent, the agent, a known friend of the student or other contacts of the student), the student's absence will now be regarded as a critical incident and be managed in line with Hawthorn-Melbourne's [Critical Incident Policy and Procedure](#). The school will review advice on the State Government's [Report a Missing Person webpage](#), which provides guidance on how and when to report a missing person, and proceed accordingly. Communication with emergency contacts/parents of a student should form part of this process.

Important: Nothing in the above process should prevent the school reporting of the student as a missing person to the Police sooner should there be reasonable grounds for doing so (e.g. preceding welfare issues or statements of concern from trusted sources which could be related to the student's disappearance).

Homestay hosts who are unable to contact a younger student, who have concerns for the student's welfare, are directed to contact staff at the school and host agency during business hours, or contact the 1800 NAVITAS emergency contact number, and the police as appropriate.

Collection and maintenance of contact details for students, parents, hosts, legal guardians

It is a student visa requirement that while in Australia and studying at Hawthorn-Melbourne, students must provide Hawthorn-Melbourne with their contact details which includes their residential address, mobile number, email address and who to contact in emergency situations. Students must also advise Hawthorn-Melbourne of any changes to those details within 7 days of the change.

Hawthorn-Melbourne collects contact details as follows:

1. When the application form is submitted.
2. When the letter of offer is accepted, which includes the completion of the parent/ legal guardian and emergency contact details form.
3. On arrival to commence the course student /parent/ legal guardian review the details already provided and are given the opportunity to confirm or update these details.

All contact details are entered into the Student Management System (eBECAS).

On arrival to commence the course the Admissions and Students Services teams do a thorough check to ensure all information is received and entered to the Student Management System (eBECAS) which is subsequently uploaded to PRISMS.

If any information is incomplete the agent / student / parent / legal guardian is contacted.

All students / parents / legal guardians receive an email every 5-weeks as a reminder to provide Hawthorn-Melbourne of any changes to their contact details which includes any update to their mobile number for use in Australia. Contact details are uploaded to PRISMS at the commencement of every course with any subsequent changes uploaded every 5 weeks.

Contact details for homestay hosts are provided to students and their families prior to their arrival via the homestay placement report.

6. Working with Children Check (WWCC) Management

All Hawthorn-Melbourne staff are required to hold a valid Working with Children Checks (or VIT registration) from the State Government.

Procedure for these Hawthorn-Melbourne staff:

- A valid WWCC is listed as a mandatory requirement when vacancies are advertised
- Navitas' HR team request the employee provide their WWCC during the onboarding process and as a requirement in order to issue a new contract

Details of the WWCC including expiry date are entered into the employee management system (iChris). The system, via HR team, will notify the employee's line manager 8 weeks in advance of when an employee's WWCC will expire.

- The line manager will contact the employee instructing them to renew their WWCC and send evidence of renewal back to their line manager.
- The line manager will send evidence of the renewed WWCC to HR team who will update this in iChris.
- As a further safeguard, HR periodically run reports from iChris to identify evidence gaps in their register, and advise relevant managers of any issues.

(Refer to *Hawthorn-Melbourne's WWCC register*)

Hawthorn-Melbourne's partner homestay hosts are required to have valid Working with Children Checks from the relevant State or Territory. Prior to each under 18 student being placed with a homestay, they are contacted to ensure that all their details are correct and that family WWCCs are valid for the duration of the student's stay, and any renewals required are completed.

7. Under 18 critical incident management

Examples of critical incidents affecting under 18 students 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 [Hawthorn-Melbourne Critical Incident Policy](#) will be enacted.

Where an under 18 student is missing and cannot be contacted, the steps in Section 3: 'Absences from school and homestay process' are followed and may result in the case being handled as a Critical Incident.

In the event that homestay arrangements for a student who is under 18 and holds a Hawthorn-Melbourne CAAW are disrupted due to an emergency or critical incident (health, mental health, environmental, abuse, crime or another problem), students and/or hosts should seek support in line with information provided in Section 3: 'Safety, wellbeing, contact and reporting provisions'.

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

Hawthorn-Melbourne 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 relevant managers per the Hawthorn-Melbourne Critical Incident Policy and Procedure 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 are asked to contact Hawthorn-Melbourne 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 a [CATT](#) or the police may occur if it is deemed to be necessary. If a younger student is detained, Hawthorn-Melbourne 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 student's 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.

8. Changes to under 18 student welfare arrangements

Early notification to DHA of changes to UNDER 18 students' welfare arrangements

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

- Hawthorn-Melbourne receives appropriate confirmation that the student will be cared for by a parent or suitable relative approved by DHA;
- The parents/legal guardians inform Hawthorn-Melbourne that the student is transferring into the care of another provider who will take over the responsibility of the student's welfare arrangements;
- The students' parents/legal 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, Hawthorn-Melbourne will inform DHA 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.

Hawthorn-Melbourne must continue to maintain welfare arrangements until the care of the student by a parent or nominated relative is approved by Department of Home Affairs, or the student leaves Australia.

Early notification to parents of changes to students' welfare arrangements

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

Suspension or cancellation of an Under 18 student's enrolment

Hawthorn-Melbourne reserves the right to suspend or cancel an overseas student's enrolment for reasons outlined on the Hawthorn-Melbourne Conditions and Enrolments and in the Student Code of Conduct which is provided to all students in the Student Handbook.

In the event of a suspension or cancellation of enrolment of a student on a student visa who is under 18, Hawthorn-Melbourne will continue to manage welfare arrangements for the student as per the Hawthorn-Melbourne Student Deferral, Suspension, Withdrawal and Refund policy, until any of the following applies:

- a) the student has alternative welfare arrangements approved by another registered provider
- b) the care of student by a parent or nominated relative is approved by DHA
- c) the student departs from Australia
- d) the student turns 18
- e) Hawthorn-Melbourne notifies DHA that it is no longer responsible for the student's welfare arrangements

Transferring welfare arrangements for under 18 students - Negotiating welfare transfer dates to ensure no gaps

Hawthorn-Melbourne 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, Hawthorn-Melbourne 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 new 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/legal guardians and agents to sign off on in advance of the move occurring.

Reminding younger students about visa obligations and transfer dates for new approved welfare arrangements

Where Hawthorn-Melbourne 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 Hawthorn-Melbourne as the releasing provider to ensure that there are no welfare gaps.

9. Study and course related matters

For under 18 students enrolled in Hawthorn-Melbourne mainstream courses (i.e. not studying in EfHS or as part of group study tour), the minimum age on course commencement is strictly 16 years old.

Hawthorn-Melbourne runs seven mainstream courses for those 16 and above. These are: General English, IELTS preparation, English for Academic Purposes, Intensive Academic Preparation, Business English, UMELBP and UMELBP Prep. All these courses rely on a combination of published texts and purpose-built, in-house materials. Therefore, the content and teaching of these course materials is designed for and suited to both young adults and more mature students. This is achieved by:

- using themes which avoid any controversial, taboo, sexual or other content typified as adult and are designed to engage students of all backgrounds and cultures with globally relatable topics such as travel, entertainment, sport, sustainable energy, and technology
- providing teacher induction and ongoing professional development which includes consideration of younger learners to ensure that instructions, language, and topics are suited to the age range.

Under 18 student visa holders are subject to the ESOS Act, and as such can be reported for non-compliance with the National Code for poor attendance, lack of academic progress and non-payment of fees. Concerns around academic progress, welfare and attendance are reported to the parents or legal guardian promptly, and as part of this Hawthorn-Melbourne endeavours to communicate any risk of non-compliance as soon as possible in order to prevent a reporting situation from occurring.

10. Under 18 non-student visa holders and group study tours

Hawthorn-Melbourne hosts a number of group study tours, of which there are two types:

1. 'Closed' study tours, where the minimum age is 14 years old. These students are tested and placed in 'closed' classes created specifically for that particular study tour group. Where these learners are under 18, Hawthorn-Melbourne has tailor-made materials suited to their learning needs through use of appropriate themes and language, such as STEM influenced models of learning and functional language to support their basic needs. Such study tours are usually 3-4 weeks in duration. Teachers assigned to under 18 groups typically have prior experience of teaching younger learners and are supported in adapting materials to suit their needs.

2. 'Integrated' Study Tours, where students are tested and placed in existing classes matching their English level and objectives. As they will be mixing with adult students, the minimum age of students on such study tours is 16 years old, with special care is taken to ensure the welfare of these younger learners. Teachers are made aware of any such students in their class via the class roll and expected to closely monitor their attendance and welfare. Furthermore, content in our mainstream courses is designed to be suitable for ages 16 and above, utilising materials from reputable publishers or designed in house which avoid more controversial, adult or politically-charged content.

Occasionally, Hawthorn-Melbourne will enrol an individual under 18 student with a visa other than a student visa. Our policy is to apply the same standard of care as with under 18 student visa holders, while acknowledging the following exceptions:

- An under 18 student on a visa other than a student visa can live with a parent-approved and parent nominated adult (in addition to a parent, legal guardian or eligible relative).
- Furthermore, Hawthorn-Melbourne provides information on homestay and guardianship options for such students at the offer stage, understanding that parents/legal guardians retain responsibility for these students.

11. Responsibilities

The Principal is responsible for overseeing centre-wide compliance in relation to this policy by ensuring institutional currency is retained relating to legislation on international students under 18 years of age studying in Australia. They consult with departmental managers to confirm that their teams are across the necessary policies and regulations and play a key role in the review and development of this policy document. They serve as a point of escalation when more serious concerns and issues relating to this subject arise.

The Student Services Manager is responsible for taking the lead on student welfare across the centre, especially for students under 18 years of age. This includes the provision of/referral to welfare support services both inside and outside the school, and ensuring Student Services staff are appropriately trained in the area. They play a key role in developing and implementing this policy document, working closely with the Principal.

The EfHS Coordinator is responsible for ensuring students and teachers on the EfHS program are properly inducted and informed so that are able to understand and comply with the regulations which underpin this policy. They also ensure course content is age-appropriate, that any welfare issues identified are properly escalated, and contribute to the development and implementation of this policy document.

The Director of Studies and Senior Teachers are responsible for assisting students with welfare issues as they arise, referring students on as appropriate, and contributing to this policy document in their respective roles.

Teachers are responsible for monitoring student attendance and welfare issues for students under 18, and bringing any concerns to the attention of the Director of Studies, EfHS Coordinator, Senior Teacher or Student Services team.

The Admissions Manager is responsible for ensuring that students receive clear and accurate information on their options for welfare arrangements at the application stage, and that relevant documents are kept up to date.

The Business Development Manager is responsible for communicating clear and accurate information relating to under 18 students to agents, families/carers and students themselves, and for assisting these stakeholders as issues arise.

12. Definitions

AHN	: The Australian Homestay Network
CAAW	: Confirmation of Appropriate Accommodation and Welfare Arrangements
CATT	: Critical Assessment Treatment Team
CRICOS	: Commonwealth Register of Institutions and Courses for Overseas Students
DHA	: Department of Home Affairs
EfHS	: English for High School program at Hawthorn-Melbourne
ESOS Act 2000	: The Education Services for Overseas Students Act 2000.
H-M	: Hawthorn-Melbourne
National Code 2018	: The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Student 2018.
SSO	: Student Services Officer
SSM	: Student Services Manager
WWCC	: Working with Children Check

13. 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.

Hawthorn-Melbourne 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.

14. Related documents

- AHN and Hawthorn-Melbourne Homestay Agreement
- AHN Verification of Appropriate Accommodation for Under 18 Students document
- Hawthorn-Melbourne Critical Incident Policy and Procedure.
- Hawthorn-Melbourne Student Deferral, Suspension, Withdrawal and Refund policy
- Hawthorn-Melbourne Student Attendance Monitoring Policy
- Hawthorn-Melbourne Student Attendance Monitoring Procedure
- Hawthorn-Melbourne Student Code of Conduct
- Hawthorn-Melbourne Monitoring Academic Progress, Academic Counselling and Intervention Policy.

15. Review

This document is reviewed by the relevant manager at least once per two years to ensure alignment to appropriate strategic direction and its continued relevance to Hawthorn-Melbourne's current and planned operations.