

International Students Under the Age of 18

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1.0 Purpose

This Procedure establishes the principles which must be applied in relation to an international student who will be or is under the age of 18 while enrolled in any course at the University, in accordance with the requirements of the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#), Standard 5.

2.0 Scope

This Procedure applies to:

- International students under the age of 18 studying in Australia on a student visa;
- Griffith University Staff involved in the promotion, recruitment, admission, student support, accommodation, academic delivery, management or administration of international students under the age of 18; and
- Griffith University business partners who are responsible for the provision of accommodation and welfare arrangements for international students under the age of 18.

This Procedure does not apply to Griffith University's interactions with students on alternative visas such as Dependents (including a spouse or a dependent child of a student visa holder) and Tourist Visa holders.

3.0 Procedure

This Procedure governs the admission, welfare arrangements and ongoing support of international students under the age of 18, and is part of the University's compliance framework for the protection of international students under the age of 18, in accordance with the [National Code 2018](#).

3.1 International Admission

- 3.1.1 International applicants who are under the age of 18 will be identified during the admission process. The University does not accept international students who are under the age of 17.
- 3.1.2 An offer of admission will be conditional upon submission of a completed and signed Griffith International Under 18 Student Agreement Form and the Griffith University U18 Acceptance of Offer Form by the student and their parent(s)/legal guardian(s).
- 3.1.3 As part of the acceptance process, Griffith University will verify parent(s)/legal guardian(s) signatures through the provision of identification as instructed on the Griffith International Under 18 Student Agreement Form and ensure that all relevant documentation has been received.

3.1.4 International applicants and their parent(s)/legal guardian(s) must provide the University with information in relation to the student's intended accommodation/welfare arrangements when accepting their offer of admission. There are three acceptable alternatives:

- **Option 1** - As parent(s) or legal guardian, they will be residing in Australia on a Student Guardian Visa (Subclass 580) and will be caring for and living with the student. In this case, Griffith University is not involved and will not issue a Confirmation of Appropriate Accommodation and Welfare (CAAW);
- **Option 2** - the student is going to reside in Australia with a guardian nominated by their parent or legal guardian, and approved by the Department of Home Affairs. In this case, Griffith University is not involved and will not issue a CAAW; or
- **Option 3** – the parent(s) or legal guardian has nominated the University as being responsible for the student's accommodation, support and general welfare arrangements. Provided the conditions set out below are satisfied, the University will accept responsibility and will issue a CAAW.

3.1.5 The University will accept responsibility for the accommodation, support and welfare of an international student under the age of 18 when commencing their program under the following conditions:

- (a) the student is at least 17 years of age;
- (b) the student's parent/legal guardian has agreed in writing to the University accepting responsibility for their child's welfare by completing and signing the Griffith International Under 18 Student Agreement Form;
- (c) the student must live in University-approved accommodation until 18 years of age and not change that accommodation unless written agreement is obtained from the parent/legal guardian and the University;
- (d) the student must be met on arrival at the Brisbane or Gold Coast airport by a University- approved representative or approved homestay provider representative;
- (e) the student will not stay overnight away from the approved accommodation address without written approval from the student's parent or legal guardian and the University;
- (f) the student cannot transfer between University-approved accommodation providers without written agreement from the parent/legal guardian;
- (g) the student must act responsibly and not partake in Risk-taking Behaviour;
- (h) the student must participate in orientation as directed, and meet with an International Student Advisor (**ISA**) in the first week after their arrival in Australia;
- (i) the student must continue to meet with an ISA to discuss Academic Progress and general welfare every two weeks until the condition described in clause 3.4.6 below is satisfied;
- (j) the student must not transfer between registered providers without University approval in accordance with the International [Student Provider Transfer Request Policy and Procedure](#). In cases where a transfer to another registered provider is approved, the University will coordinate the transfer date for welfare arrangements with the receiving registered provider to ensure there is no gap in welfare arrangements; and
- (k) a student planning to leave Australia must advise their assigned ISA who will ensure that the student is escorted to the airport by an approved University representative or approved homestay provider representative.

3.2 Issue of CAAW

3.2.1 If the University:

- (a) agrees to take responsibility for the accommodation, support and general welfare arrangements for the international student; and
 - (b) approves the proposed welfare and accommodation arrangements,
- it will issue a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter via the Commonwealth's Provider Registration and International Student Management System ("**PRISMS**").

3.2.2 The nominated start date on the CAAW will normally be fifteen (15) days prior to start of teaching for the period of admission. The end date of the CAAW will be the date the student turns 18 years of age or the end date of the Confirmation of Enrolment (CoE) plus seven days, whichever is the earliest.

3.2.3 The CAAW will be signed by the University's delegated authority prior to the Confirmation of Enrolment (CoE) being approved.

3.2.4 The student cannot arrive in Australia before the nominated start date of the CAAW. A student who does travel to Australia before their welfare arrangements are due to commence is at risk of having their visa cancelled.

3.2.5 If the University accepts an international student under the age of 18 who has welfare arrangements approved by another registered provider, the transfer date for welfare arrangements will be negotiated with the releasing registered provider to ensure there is no gap in welfare arrangements. The international student will be informed of their visa obligation to maintain their current welfare arrangements until the transfer date, or have alternative welfare arrangements approved, or return to their home country until the new approved welfare arrangements take effect.

3.3 Provision of Information

3.3.1 Regardless of whether or not the University accepts responsibility for approving the accommodation, support and general welfare arrangements, it is required under the National Code 2018, Standard 5.2 to provide all international students under the age of 18 with age-and culturally-appropriate information about certain matters.

3.3.2 When an approved CoE is distributed to the international student under the age of 18, the University will also provide age- and culturally-appropriate safety information on:

- (a) who to contact in emergency situations, including contact numbers of a nominated Staff member and/or service provider to the University; and
- (b) seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse.

3.4 Welfare Arrangements and on-going support

3.4.1 Griffith International will require advice of the arrival details of all international students under the age of 18 and ensure that these students are met at the domestic or international airport in Brisbane or the Gold Coast by an approved University representative or approved homestay provider representative.

3.4.2 The Manager, International Student Experience:

- 3.4.2.1 allocates each under 18 international student to an International Student Advisor (ISA) when a CAAW is issued by the Admissions team; and

- 3.4.1.1 is responsible for ensuring that each ISA so allocated meets the requirements of the [Working with Children \(Risk Management and Screening\) Act 2000](#), including that they hold a current Blue Card.
- 3.4.1.2 will contact international students under the age of 18 prior to the commencement of their CAAW to provide details of their appointed ISA and the process to arrange the initial meeting, an emergency contact number and information on how to seek assistance and report any incident or allegation involving actual or alleged sexual, physical or other abuse.

During the initial ISA meeting in week 1 of the trimester the student will be provided with

- 3.4.1.3 contact details for emergency situations and after hours;
 - 3.4.1.4 information on how to seek assistance and report any incident or allegation involving actual or alleged sexual, physical or other abuse;
 - 3.4.1.5 information regarding available welfare support including physical and psychological support;
 - 3.4.1.6 information about the University's role and responsibilities and the student's role and responsibilities as outlined in the *Student Charter Framework*;
 - 3.4.1.7 curfew times and the process that will be enacted if curfew is missed;
 - 3.4.1.8 information on enrolment and academic support; and
 - 3.4.1.9 information regarding homestay requirements, as applicable.
- 3.4.2 International students under the age of 18 must complete the online myOrientation module which all commencing students are required to complete and meet with an ISA in the first week after their arrival in Australia.
 - 3.4.3 International students under the age of 18 must continue to meet with an ISA to discuss Academic Progress and general welfare every two weeks thereafter and at the end of trimester or Study Period, until the condition described in clause 3.4.6 below is satisfied. At each meeting the ISA must verify that the student's contact details, and parents'/guardian's contact details are up to date.
 - 3.4.4 Meetings between the ISA and the student will continue until the earlier of:
 - 3.4.4.1 the student turns 18 years of age;
 - 3.4.4.2 the student leaves Australia;
 - 3.4.4.3 another registered provider accepts responsibility for the student's accommodation, support and welfare;
 - 3.4.4.4 the student's parent, relative or legal custodian accepts responsibility in accordance with Department of Home Affairs regulations; or
 - 3.4.4.5 the University ceases provision of or is unable to continue to approve the welfare arrangements as advised to the Department of Home Affairs.

3.5 Accommodation restrictions

- 3.5.1 International students under the age of 18 are not permitted to stay overnight away from the University-approved accommodation address without written approval from the student's parent or legal guardian and the University.
- 3.5.2 International students under the age of 18 who wish to stay overnight at an address other than their University-approved accommodation address or to apply for travel must submit an International Under 18 Overnight Accommodation Consent Form to their ISA which has been signed by their homestay parent or accommodation provider and parent/legal

guardian approving such accommodation. This form must also be approved and signed by the Deputy Director, Griffith International (or nominee).

- 3.5.3 Griffith English Language Institute (GELI) international students under the age of 18 who wish to stay overnight at an address other than their University-approved homestay address or to apply for travel must meet with the GELI Support Services Coordinator and submit the Under 18 Overnight Consent Form, which has been signed by their homestay parent or accommodation provider and parent/legal guardian approving such accommodation. This form must also be approved by the Director, GELI (or nominee).
- 3.5.4 International students under the age of 18 cannot transfer between University-approved accommodation without written agreement from the parent/legal guardian.
- 3.5.5 International students under the age of 18 must act responsibly and not partake in Risk-taking Behaviour.

3.6 Student safety

- 3.6.1 The [Student Critical Incident Management Policy](#) outlines the process for managing a student critical incident.
- 3.6.1 In addition to the processes outlined in those documents, all Griffith University Staff, homestay and other approved accommodation providers must report all Student Critical Incidents involving an international student under the age of 18 to the Vice President (Global) or delegate, while ensuring at all times there are appropriate ongoing welfare arrangements in place.
- 3.6.2 If an international student under the age of 18 is missing from approved accommodation and cannot be contacted, the Student Critical Incident Management Policy will be implemented.
- 3.6.3 In the case where a student cannot be contacted, the University will make all Reasonable Efforts to locate the student, including notifying the police, and parents and/or legal guardian as soon as practicable.
- 3.6.4 If the student has not been found, the University will complete a Non-Approval of Appropriate Accommodation/ Welfare Arrangements letter on PRISMS as soon as practicable.

3.7 Transfer of responsibility for welfare arrangements

- 3.7.1 An international student under the age of 18 seeking to transfer to another CRICOS registered provider must:
 - 3.7.1.1 complete the Letter of Release Request Form; and
 - 3.7.1.2 obtain parental/legal guardian approval; and
 - 3.7.1.3 provide the approval of the other provider if they are taking responsibility for the student's accommodation, welfare and support arrangements; and
 - 3.7.1.4 remain in University-approved accommodation until the transfer request has been assessed and approved.
- 3.7.2 If the student is sponsored, the sponsor must also provide their written approval.
- 3.7.3 The University will liaise with the prospective provider to ensure there is no gap in welfare arrangements and advise the student of their visa obligations in relation to maintaining welfare arrangements throughout the transfer period.

3.8 Student departure from Australia

- 3.8.1 An international student under the age of 18 planning to leave Australia is to advise their assigned ISA who will inform and provide flight details to the student's parent/legal guardian and the University-approved accommodation provider. The ISA will ensure that the student is escorted to the airport by an approved Griffith University representative or approved homestay provider representative and that PRISMS is updated as required.

3.9 Termination of University approval of Welfare arrangements due to student actions

- 3.9.1 All reasonable efforts will be made by the University to assist international students under the age of 18 with difficulties impacting their welfare arrangements. However, University approval for accommodation, welfare and support may be withdrawn based on one or more of the following grounds:
- 3.9.1.1 a student refuses to observe reasonable standards of behaviour as outlined in the *Student Charter Framework*, and *Student Misconduct Policy*;
 - 3.9.1.2 the student refuses to maintain University-approved accommodation arrangements;
 - 3.9.1.3 the student stays overnight at an address other than the University-approved accommodation address without parental/legal guardian and University approval;
 - 3.9.1.4 the student goes missing from their accommodation and cannot be found or contacted, even after the University has implemented its critical incident policy; and
 - 3.9.1.5 the student's enrolment is suspended or cancelled by the University.
- 3.9.2 The student will be notified in writing of the grounds for intended withdrawal of University supported welfare arrangements by the Deputy Director, Griffith International or delegate (for degree students) or the Director, GELI or delegate (for GELI students). A copy of this correspondence will be forwarded to the student's parent/legal custodian.
- 3.9.3 For degree students and GELI students, the decision to withdraw accommodation, welfare and support is reviewable under the Griffith University Student Review and Appeals Policy.
- 3.9.4 Where Griffith University suspends or cancels the enrolment of the overseas student, it will continue to approve the welfare arrangements for the student until any of the following applies:
- 3.9.4.1 the student has alternative welfare arrangements approved by another registered provider;
 - 3.9.4.2 care of the student by a parent or nominated relative is approved by Department of Home Affairs;
 - 3.9.4.3 the student leaves Australia.

3.10 Termination of University approval of Welfare arrangements for other reasons

- 3.10.1 The University may also terminate a CAAW where it can no longer take responsibility for the international student due to events such as:
- 3.10.1.1 the international student is refusing their accommodation or leaving their accommodation without notice, even after the registered accommodation

provider has exhausted all possible avenues of assisting the international student to maintain appropriate arrangements; and

3.10.1.2 the accommodation provider becomes unable to maintain arrangements.

3.11 Required notifications

- 3.11.1 If the University is no longer able to approve the welfare arrangements of a student, it will make all Reasonable Efforts to ensure the international student under the age of 18's parents or legal guardians are notified immediately and the CAAW is terminated within 24 hours.
- 3.11.2 The University will advise Department of Home Affairs in the form required by that department:
 - 3.11.2.1 as soon as practicable if the student will be cared for by a parent or nominated relative approved by the Department and CAAW is no longer required; and
 - 3.11.2.2 within 24 hours if the University is no longer able to approve the student's welfare arrangements.
- 3.11.3 Where the grounds for University withdrawal of welfare support is due to the student refusing to maintain University-approved accommodation arrangements, the University will complete the Non-Approval of Appropriate Accommodation/Welfare Arrangements letter on PRISMS. Issue of this letter signifies a breach of student visa condition 8532 and may result in student visa cancellation.
- 3.11.4 Where the University receives written confirmation that the student's parent/legal guardian or an alternative provider will be accepting responsibility for the student, the University will complete the PRISMS Approval to Change Accommodation/Welfare Arrangements letter.

3.12 Homestay and Accommodation Arrangements

- 3.12.1 Campus Life at Griffith University is responsible for selecting, screening, appointing and monitoring homestay provider services or Purpose-Built Student Accommodation Providers (PBSA) in accordance with relevant policies and processes. This process will take place prior to an international student under the age of 18 residing in that accommodation, and will be reviewed at least every six months while an international student under the age of 18 remains in that accommodation.
- 3.12.2 Where a third-party international students under the age of 18 accommodation provider is appointed, Campus Life will conduct an initial physical site visit to verify the international student under the age of 18's accommodation meets the requirements of the National Code. The University will ensure that they have entered into a signed Service Level Agreement with registered homestay provider services or PBSAs.
- 3.12.3 The University Service Level Agreement will detail:
 - 3.12.3.1 requirements for the homestay provider service or PBSA to have an international student under the age of 18 Policy and Procedure.
 - 3.12.3.2 requirements for the homestay provider service or PBSA to have processes to ensure host families and PBSA staff receive appropriate training and hold a current Blue Card.
 - 3.12.3.3 requirements for monitoring accommodation standards through six monthly reports to the University and regular meetings and site visits between the University and homestay provider services or PBSAs to discuss the arrangements and confirm that the accommodation still meets the international student under the age of 18's needs.

- 3.12.3.4 critical incident procedures that require the University to be notified of any critical incident involving its student within one hour of the incident being identified. The homestay provider service or PBSA's critical incident procedures will be reviewed every six months by the University.

4.0 Definitions

For the purposes of this procedure and related policy documents, the following definitions apply:

Academic progress refers to the student achieving satisfactory course progress.

Blue Card has the meaning given under the [Working with Children \(Risk Management and Screening\) Act 2000](#).

CAAW means the Confirmation of Appropriate Accommodation and Welfare arrangements, under, which Griffith University approves the accommodation and general welfare arrangements for under 18 international students.

PRISMS is a secure database owned and maintained by the Department of Education, Skills and Employment for the purposes of administering the Education Services for Overseas Students Act 2000 (The ESOS Act). PRISMS provides a means for education and training providers to comply with legislative requirements.

Reasonable Efforts refer to what can reasonably be done in the circumstances when complying with duties to maintain under 18 international student enrolment whilst managing their welfare and protection.

Risk-taking Behaviour refers to unnecessarily engaging in activities or behaviours that are dangerous or highly subject to chance.

Staff refers to both paid and unpaid people undertaking work for, or on behalf of, the University.

Student Critical Incident has the meaning given in the [Student Critical Incident Management Policy](#).

Study Period A defined teaching period specified by the University for the completion of units for a particular course or an English Language Intensive Courses for Overseas Students (ELICOS) program.

5.0 Information

Title	Under 18 International Student Procedure
Document number	2023/0000462
Purpose	This Procedure establishes the principles which must be applied in relation to an international student who will be or is under the age of 18 while enrolled in any course at the University, in accordance with the requirements of the <u>National Code of Practice for Providers of Education and Training to Overseas Students 2018</u> , Standard 5.
Audience	Staff; Students; Public
Category	Academic
Subcategory	Student Services
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Effective date	Trimester 1 2022

Revised date	2023 (Currently under review)
Policy advisor	Deputy Director, Griffith International Director, Griffith English Language Institute
Approving authority	Vice President (Global)

6.0 Related Policy Documents and Supporting Documents

Legislation	National Code of Practice for Providers of Education and Training to Overseas Students 2018, Part B, Standard 5 Migration Regulations 1994 Child Protection Act 1999 Working with Children (Risk Management and Screening) Act 2000
Policy	Under 18 International Student Policy Student, Conduct and Wellbeing Policy Student Review and Appeals Policy Student Critical Incident Management Policy Student Charter Framework International Student Provider Transfer Request Policy and Procedure Child Safety and Wellbeing Policy
Procedure	International Students Under the Age of 18 - Approved Accommodation Providers Selection and Monitoring Student Breaches of Academic Integrity Procedure Student Review and Appeals Procedure Child Risk Management Procedure
Forms	GI Travel Request Form Griffith International Under 18 Student Agreement Form International Under 18 Overnight Accommodation Consent Form Release Request Form Review of Decision Form