Young Learners Policy and Procedure

Purpose

The purpose of this document is to set out the policy and procedure adhered to by Universal Education Centre Pty Ltd (trading as Universal English College and herein referred to as "UEC" or "the college") and its staff with respect to the recruitment, enrolment, communications with and regarding, and provision of all services to students under the age of 18.

The core principle of this policy is to confirm that UEC will ensure it takes all reasonable measures to comply with all legislative and regulatory requirements, such as those set out in the ESOS framework, including those requirements relating to students under the age of 18 set out in Standards 2, 3, 5 and 7 of the National Code, Section 19 of the ESOS Act, and Section 2 of the ESOS Regulations.

In its engagement with, delivery of courses to, and support of international students, UEC prioritises the delivery of high-quality educational assessment services and the protection of the rights of potential and current international students as well as protection of the reputation of UEC and of the Australian international education industry as a whole.

Scope

This document and the policy and procedure set out in it apply to all activities of UEC, its staff, contractors, and relevant third parties related to prospective and enrolled international students who are below the age of 18 years.

This document and the policy and procedure set out in it exist in the context of all other UEC policy and procedure documentation. In particular, this policy and procedure works in close conjunction with the policies and procedures on:

- Student recruitment
- Student enrolment
- Student Support
- Teaching and Training
- Human Resources

This policy should, therefore, be read together with those documents. It should be noted that matters specific to policies and procedures relating to educational teaching and training, resources, and teacher and trainer qualifications are dealt with in those respective policy documents.

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Policy Details

Below are the specific details of UEC's Young Learners Policy and Procedure.

1. UEC is committed to ensuring that all international students who are under the age of 18 is in accordance with all legislative and regulatory requirements that govern UEC and its operations, including the requirements of the ESOS Act, ESOS Regulations, and the National Code.

2. UEC will, in all matters relating to international students who are under the age of 18, prioritise the safety and rights of these students, including as they are set out in the ESOS Framework.

3. UEC will, as per the details of the policy and procedure documents relating to Marketing, Student Recruitment, and Enrolment, ensure it makes available, in its efforts to recruit prospective students, comprehensive, current, and plain English information relating to its policy and procedure for accommodation, support, and welfare for U18s.

4. UEC will, as per the Enrolment Policy, ensure that the Written Agreement it enters with a student who is under the age of 18 will be signed by that student's parent or legal guardian.

5. UEC will ensure it maintains up to date contact details (residential address, email, and mobile phone) for all U18 students and the parent or legal guardians of each of these students.

6. UEC will, where it takes responsibility for the accommodation, support, and general welfare of an U18 student, nominate the precise dates for the start and end of this responsibility and communicate these dates to Immigration.

7. Where UEC takes responsibility for the accommodation, support, and general welfare of an U18 student, it will not take responsibility for legal guardianship of that student.

8. UEC will make it a condition of enrolment for U18 students who will not be travelling with at least one parent, to use the UEC Airport Pick-Up service that transports them to and from the airport to their accommodation. This applies to all visa holder types.

9. Whenever an U18 student fails to arrive and begin his or her course when expected or has his or her course cancelled for any reason, UEC will notify Immigration via PRISMS within 14 working days.

10. UEC will advise immigration as soon as practicable if the student will be cared for by a parent or nominated relative and that a CAAW is no longer needed.

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11. UEC will ensure any adults involved in providing accommodation and welfare arrangements have all working with children clearances appropriate to the jurisdiction in question.

12. UEC will maintain and implement a set of procedures, detailed later in this document, for verifying the accommodation and welfare services it provides for U18 students is appropriate to their age and needs, including:
    a. how it will ensure the accommodation is effectively reviewed prior to its initial use and at least every 6 months thereafter
    b. how it will select, screen, and monitor any 3rd parties engaged to organise and assess welfare and accommodation arrangements.

13. UEC will include in its critical incident policy appropriate procedures for managing disruptions to accommodation and welfare arrangements for U18s.

14. UEC will make all reasonable efforts to immediately notify the parent or legal guardian of any U18 student if it is no longer able to approve the arrangements and provisions relating to an U18 student's welfare and will advise immigration of the same within 24 hours.

15. UEC will maintain responsibility for the welfare arrangements for any U18 student whose enrolment is suspended or cancelled until:
    a. the student has alternative welfare arrangements approved by another registered provider; or
    b. care of the student by a parent or nominated relative is approved by Immigration; or
    c. there is appropriate evidence that the student has left Australia; or
    d. it has notified Immigration it is no longer able to approve the student's welfare arrangements; or
    e. it has notified Immigration that it has taken the required action after not being able to contact the student.

16. As per the student transfer policy, UEC will only approve transfers of U18 students where it deems it is
    a. in the best interest of the student; and
    b. the student's parent or legal guardian has provided UEC with written approval of the transfer; and
    c. the new provider provides UEC with written confirmation of the enrolment; and
    d. arrangements for the U18 student's accommodation and welfare.

17. Whenever an U18 student transfers to another registered provider, UEC will negotiate the transfer date for welfare arrangements with the releasing registered provider to ensure there is no gap between the end of one provider being responsible and the start of the other being responsible. UEC will also inform the student of the student visa obligation requiring them to maintain their accommodation and welfare arrangements until this transfer date or leave the country until the new arrangements take effect.

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18. If it is unable to contact a U18 student and/or has concerns for an U18 student's welfare, UEC will make all reasonable efforts to locate the student, including notifying the police and any other relevant Commonwealth, state or territory agencies as soon as practicable.

19. UEC will ensure that each person interacting with an U18 student as part of the delivery of the services it provides will have all working with children clearances appropriate to the jurisdiction in question.

20. UEC will ensure that its facilities are appropriate for the needs and capabilities of any U18 students as and when they are enrolled and present on any of its campuses.

21. UEC will, whenever communicating information relating to the enrolment, assessment, changes of services to and visa-obligation related warnings to U18 students, ensure it also copies these communications to the students' parents or legal guardians on the outcome of assessments.

22. UEC will ensure that the management of matters relating to international students who are under the age of 18 will involve sufficient oversight in order to ensure compliance with this policy and with all legislative and regulatory requirements, such as those set out in the ESOS framework.

23. UEC will ensure appropriate records are kept relating to all recruitment and enrolment of and provision of services to international students who are under the age of 18.

Procedure Details - General

Below are the specific elements of the implementation of the above-detailed policy and the procedures to be followed by UEC staff and its contractors and partners.

24. Responsibility for approving and ensuring the effective maintenance and implementation of this policy is held by the Campus Director or delegated authority. Should this role be temporarily vacant for any reason, the responsibility immediately escalates to the Managing Director of UEC.

25. As per the details of the Governance and Compliance Policy, this policy and procedure will be reviewed at least annually (i.e. within 12 months of its latest update) and will be updated whenever is required by any changes in the regulatory or legislative requirements that govern UEC, in its assessment practices, or other changes that might require its review.

26. As per the details of the Governance and Compliance Policy, this policy and procedure will be made openly available by UEC to all relevant stakeholders.

27. All staff, contractors, or partners to whom this policy applies are made aware of this policy and procedure, are supported to understand its contents, and trained to follow its directives through:
    a. Effective induction of new staff, contractors, and partners; and

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b. Ongoing training of new and existing staff, contractors, and partners; and
c. Any other means deemed appropriate from time to time.

28. UEC will ensure course materials and teaching must be appropriate to take into differing levels of age and maturity of its students.

Procedure Details – Enrolments, Transfers, & Changes

29. In assessing each application for enrolment at UEC, the Registrar will request the contact details of the parents or legal guardian for any student who will be under the age of 18 at the time of course commencement and confirm whether the student will be travelling to and/or living in Australia with his or her parent or legal guardian. Thereafter all UEC staff will copy to the student's parent or legal guardian any communication to the student concerning matters including, but not necessarily limited to the student's:
    a. fees
    b. enrolment status – e.g. enrolled, commenced, deferred, suspended, cancelled
    c. accommodation
    d. attendance
    e. course progress
    f. behaviour
    g. visa obligations.

30. In assessing the application of any student who will be under the age of 18 at the time of arrival in Australia and who will not be travelling and residing with his or her parent or legal guardian, the admissions officer will only accept the booking where the applicant has:
    a. communicated the date and time of their arrival and their flight details
    b. booked a homestay accommodation arranged by UEC
    c. booked the UEC arranged caregiver service
    d. purchased or agreed to purchase insurance from UEC
    e. nominated to take an UEC arranged Airport Transfer to and from this accommodation
    f. does not have study breaks or enrolments which would include the Christmas closure period
    g. for visa holder types apart from student visa, or if all of the conditions above are not met, the decision of whether to accept the student shall be made by the Campus Director

31. Once an application from a student who will be under the age of 18 at the time of course commencement has been accepted, the Registrar will confirm the Written Agreement has been signed by the student's parent or legal guardian before creating and issuing a CAAW and an eCoE. The Admissions Officer responsible will nominate the legal guardian assigned to the student and confirm that this person is not a member of UEC staff.

32. Each week, Student Services will create a list of any U18 students commencing programs in the following week and will schedule an additional Orientation session for these students to confirm the students' understanding of their rights, obligations, and the services available to them. This will include the requirement that each U18 student attends a weekly 'check-in' with student services to confirm there have been no changes in or concerns arising from each U18 student's:
    a. contact details – address, email, mobile

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b. parent's or legal guardian's contact details – address, email, mobile
c. accommodation
d. welfare
e. course progress
f. course attendance
g. intention to complete his or her enrolled course(s).

33. During the U18 orientation session, UEC will ensure students under 18 years of age are given age-and culturally-appropriate information on who to contact in emergency situations, seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse

34. When, in relation to the previous point, an U18 student raises an issue or concern or when a member of UEC staff raises a concern about an U18 student, including where the student has not arrived as per the agreed schedule, the student services officer will, as appropriate, immediately clarify and confirm the details of the issue with the student and any other relevant parties and communicate the issue to the Campus Director or delegated authority, who will decide and implement the measures to be taken to address the matter. This may include:
    a. contacting the student's parent or legal guardian to confirm their understanding, consent, or involvement in the matter
    b. contacting the student's representative agent
    c. contacting the student's accommodation provider
    d. discussing and possibly arranging additional academic or welfare support for the student
    e. confirming the student's understanding of and intention to comply with their obligations relating to his or her:
        i. visa, e.g. to attend classes, to maintain the arranged accommodation and welfare arrangements; or
        ii. enrolment, e.g. to make payment of fees, to comply with the student Code of Conduct
    f. contacting Immigration via PRISMS to update details listed with the U18 student's eCoE
    g. addressing the matter as an U18 student transfer application (addressed below)
    h. arranging immediate meetings to escalate the matter, e.g. where the student is not willing to comply with one or more of his or her obligations such as maintaining his or her accommodation and welfare arrangements
    i. immediately contacting the police and/or any other Commonwealth, state or territory agency.

35. Whenever it becomes apparent that an U18 student intends to or has already ceased to maintain his or her accommodation and welfare arrangements, the matter will be immediately escalated to the Campus Director or delegated authority who will:
    a. Immediately meet with the student to confirm the details of the situation; and
    b. contact the student's parent or legal guardian within 24 hours; and
    c. confirm or establish an alternative approved accommodation and welfare arrangement – either with an UEC U18 approved accommodation provider or the student's parent, legal guardian, or approved family member; or
    d. confirm that the student will leave the country without a gap in the approved welfare arrangements; or
    e. communicate to Immigration that UEC can no longer be responsible for the

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student's accommodation and welfare.

36. In any case that an U18 student lodges an application for a transfer to another provider, the matter will be escalated to the Campus Director or delegated authority, who will address the matter as per the Student Transfers Policy, including that:
    a. the application will only be considered where accompanied by a written confirmation of support for the request by the student's parent or legal guardian; and
    b. the applicant must demonstrate a valid reason for the transfer; and
    c. the applicant must provide a written Letter of Offer from the alternative CRICOS provider; and
    d. the alternative provider must provide a written and verbal confirmation and evidence of its willingness and readiness to assume responsibility for the U18 student's accommodation and welfare arrangements; and
    e. the alternative provider must provide written confirmation of the date on which they will assume responsibility for the U18 student's accommodation and welfare arrangements as negotiated with UEC.

37. In any case that a transfer of an U18 student is agreed by the Campus Director or delegated authority, the student and the student's parent or legal guardian will be advised:
    a. to seek guidance from Immigration on the implications of the change for the student's visa; and
    b. that the student must:
        i. maintain his or her accommodation and welfare arrangements until the agreed transfer date; and
        ii. sign a statement to confirm that the advice has been understood.

Procedure Details – Selecting, Screening, and Monitoring Accommodation for U18s

38. All accommodation for U18 students will be provided through contracted third-party accommodation providers, such as Global Experience. Any new contract must be approved by the Campus Director or delegated authority and the Managing Director. Before entering a contract with a new accommodation provider for U18 accommodation, the Campus Director or delegated authority, and the Managing Director will assess the provider by various means which can include meeting with them and by checking with references from other colleges who have used the provider's services.

39. All accommodation providers must commit to reviewing each homestay location before including it as an accommodation option for an U18 student, and then again every 6 months it is in use, and any time a concern is raised about it, including by:
    a. Visiting the location; and
    b. Speaking face-to-face with the host and confirming each adult residing at the location is of appropriate character, including by checking that all relevant child-safety checks are up to date; and
    c. Confirming any and all rooms to be used by the student are safe, secure, comfortable, and appropriate; and
    d. Confirming that public transport travel to and from the college and the homestay

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location are reasonable.

40. Every 12 months, the Campus Director or delegated authority will arrange a meeting with any contracted accommodation providers who are or who intend to provide accommodation for U18 to review the provider's implementation of the above listed procedures.

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41. Whenever an issue is raised about the welfare of an U18 student relating to that student's accommodation, the issue must be immediately escalated to the Campus Director or delegated authority, who will immediately contact the contracted accommodation provider to review the situation. Wherever any doubt exists as to the safety and/or welfare of the U18 student in that homestay, a new accommodation option will be arranged immediately and the student supported to transfer to the new location.

42. Wherever an issue is raised about the welfare of an U18 student relating to that student's accommodation that involves or is reasonably suspected to involve any illegal activity or activity that infringes on the student's human rights, the matter will be immediately escalated to the Campus Director or delegated authority, and/or Managing Director and as appropriate to the police and other relevant authorities.

43. Wherever a homestay location is found or reasonably suspected to not be conducive to the health and safety of an U18 student, the accommodation provider will remove it from its register of approved options for U18 students.

44. Wherever an accommodation provider does not demonstrate they have followed the above procedures appropriately, that provider will not be used to provide accommodation for U18 students thereafter.

In Compliance With

The various elements of this document have been developed to comply with the requirements under the ESOS framework, including, but not necessarily limited to:

ESOS Act 2000

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Young Learners
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National Code Standards 5

ELICOS Standard 2

Version Control

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