

International Students Under 18 Policy

Document

Document Name	International Students Under 18 Policy
Brief Description	This policy provides the framework for the management of the wellbeing, support, accommodation and welfare arrangements of under 18 international students by the Sydney Institute of Business and Technology (SIBT).
Responsible Officer	Student Services Manager
Delegated Approver	Senior Management Team
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Version Control

Date Approved	Version No.	Summary of Changes	Approver
13/2/25	8	Amended CAAW section to meet regulatory changes to process. Strengthened Purpose Added Principles, Critical Incident Management, Reporting and Monitoring and Review clauses. Broadened policy to include wellbeing and support, mandatory reporting, WCCC and Child Protection training. Added more clarity on Homestay Provider responsibilities.	Senior Management Team

Related Documents

Name	Location
Admissions Policy	SIBT Website
Critical Incident Policy	SIBT Website
Student Complaints and Appeals Policy	SIBT Website
Transfer of Provider Policy	SIBT Website
Confirmation of Appropriate Accommodation and Welfare (CAAW) letter	PRISMS
Approval to Change Accommodation/Welfare Arrangements letter	PRISMS
Non-Approval of Appropriate Accommodation/Welfare Arrangements letter	PRISMS
Guardianship Form for Students Under 18	SIBT Website



Name	Location
Education Services for Overseas Students Act 2000	https://www.legislation.gov.au/
National Code of Practice for Providers of Education and Training to Overseas Students 2018	https://www.legislation.gov.au/
Migration Regulations 1994	https://www.legislation.gov.au/
Immigration Guidelines - Welfare Arrangements for Students Under 18.	https://immi.homeaffairs.gov.au/
Child Protection (Working with Children) Act 2012	https://legislation.nsw.gov.au/



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1. Purpose

- a) The purpose of this Policy is to outline the assessment and approval of welfare and accommodation arrangements for international students under the age of 18 who are studying at Sydney Institute of Business and Technology (SIBT).
- b) This Policy includes the provision, monitoring and review of all support provided to international students under the age of 18.
- c) This Policy is to be read in conjunction with the stated Related Documents.

2. Definitions

Term	Meaning
Approved Homestay Provider	A provider approved by SIBT and that SIBT has a current agreement with, to provide accommodation services to international students who are under 18 years of age.
Confirmation of Appropriate Accommodation and Welfare (CAAW)	A signed document generated in PRISMS and issued by SIBT which approves a student's accommodation and welfare arrangements while a student of SIBT and up until they turn 18 years of age.
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students.
Critical Incident	An incident that is a sudden, unexpected, and traumatic event or threat outside the normal range of experience of the community affected but having the potential to cause death, injury, severe emotional stress or distress, destruction, loss of property, shut down or disruption of business operations.
DHA	Department of Home Affairs
electronic Confirmation of Enrolment (eCoE)	Evidence of a student's enrolment with a provider registered on CRICOS that is required before the DHA issues a student visa. The eCoE includes information about the provider, course, and duration of study in which the student has enrolled.
Host Profile	Description of the family with the Approved Homestay Provider
Nominated Guardian	An international student's parent, person who has legal custody, or an eligible relative who is aged over 21 and is of good character, and who is approved by the Department of Home Affairs (DHA).
Package Offer	An offer which includes more than one program generally inclusive of a Bachelor course
PRISMS	Provider Registration and International Student Management System
Working with Children Check (WWCC)	An authorisation that is in force under the Child Protection (Working with Children) Act 2012 to provide clearance to engage in child-related work.

3. Application

- a) This Policy applies to prospective and current international students under 18 years of age undertaking Foundation or Diploma programs at SIBT.
- b) The policy comes into effect in Australia 14 days before the commencement of the SIBT program and remains in effect until the student turns 18 years of age or ceases to be a student of SIBT or for seven (7) days after the end date of the electronic Confirmation of Enrolment (eCoE), whichever is earliest.

- c) SIBT staff involved in the management of International Students under the age of 18 years.

4. Policy Statement

- a) The Sydney Institute of Business and Technology (SIBT) will:
 - i. As a CRICOS registered provider, ensure compliance with Standard 5 of the Education Services for Overseas Students (ESOS) National Code 2018, the regulations of the Department of Home Affairs (DHA), and State child protection laws; and
 - ii. Take responsibility for the support of international students under 18 years of age enrolled in a SIBT program from its commencement date until they turn 18 or cease to be a student, including the welfare and accommodation arrangements for International under 18 students who do not reside with their DHA approved nominated guardian.

5. Policy Principals

- a) In accordance with the ESOS ACT, SIBT will ensure that any international student under the age of 18 will be living with:
 - i. A nominated guardian approved by the DHA; or
 - ii. An Approved Homestay Provider who has a written agreement with SIBT.
- b) DHA defines a '**nominated guardian**' as a person who is:
 - iii. The parent of the student
 - iv. A person with legal custody of the student or
 - v. A relative of the student, aged 21 years or older and of good character, nominated in writing by a parent or person who has custody of the student.
 - A relative is a:
 - Parent or stepparent,
 - grandparent or step-grandparent,
 - sibling or step-sibling,
 - aunt, uncle, step-aunt or step-uncle.
- c) The minimum entry age for students commencing their studies at SIBT is 17 years.
- d) The student visa condition 8532 imposes an obligation on all international students under 18 to maintain accommodation, support, and general welfare arrangements approved by DHA or SIBT for the duration of their studies with SIBT or until they turn 18 years of age.
- e) The student must not enter Australia before the welfare commencement date on the Confirmation of Appropriate Accommodation and Welfare (CAAW). This is a condition of the visa.
- f) SIBT Student Services Team is responsible for monitoring the accommodation and welfare of International Students under 18 years of age with a CAAW in place.
- g) SIBT will ensure age and culturally appropriate information is given to the students including, but not limited to, information on emergency contacts and how to seek assistance and report incidents and support channels such as:
 - i. Incidents or allegation of sexual, physical, or other incidents or/an assaults;
 - ii. Verbal or psychological abuse or aggression;
 - iii. Disruption in the student's welfare and accommodation arrangements;

- iv. Domestic violence.
- g) Training of academic and frontline staff in child protection principles as part of new commencing staff's induction and as a refresher for long-term staff as required.
- h) This Policy authorises SIBT to notify the DHA through PRISMS that it is no longer able to approve an overseas student's welfare arrangements.

6. SIBT Approved Care Arrangements

6.1 Accommodation

- a) At the time of application, all international students are required to indicate to SIBT that they will be living in appropriate accommodation arrangements.

Age at Commencement	Accommodation
17 – 18 years of age	<ul style="list-style-type: none"> • A nominated guardian approved by the DHA; or • An Approved Homestay Provider who has an agreement with SIBT.

- b) SIBT will issue CAAW letter only to students who nominate they will stay with a SIBT Approved Homestay Provider.
- c) SIBT may consider other Homestay Providers where a student already has a stable homestay arrangement in place.

6.2 Living with a Nominated Guardian

- a) If the student plans on living with a nominated guardian approved by DHA, the following documents are required by SIBT:
 - i. A completed 'Guardianship Form for Students Under 18' form signed by the parent or custodian;
 - ii. A certified copy of the student's passport;
 - iii. A certified copy of parent /nominated guardian's identification containing both a photo and signature (e.g. passport, driver's licence or official ID card).
- b) The student's parent or legal custodian can apply to nominate a guardian directly to DHA. DHA will assess the nominated arrangements and, if approved, the parent, legal custodian or eligible relative will be the international student's 'nominated guardian'. SIBT is not involved in this assessment and will not issue a CAAW letter.

6.3 Living with an Approved Homestay Provider

- a) Where a student under the age of 18 is not under the care of a nominated guardian, the student is required to reside in the SIBT approved Homestay Provider. This will ensure arrangements to protect the personal safety and social well-being of students is in place.
- b) Approved Homestay Providers are those SIBT has a written agreement with and are published on the SIBT website.
- c) Homestay Providers ensure all host families undergo appropriate working with children checks and are of good character, monitor the currency of WWCC clearance throughout the arrangement, carry out regular six (6) monthly inspections of the accommodation, and provide reports to SIBT.

- d) Students wishing to reside with a SIBT Approved Homestay Provider are required to provide the following documents to SIBT:
 - i. A completed 'Guardianship Form for Students Under 18' form signed by the parent or custodian;
 - ii. A copy of homestay arrangement confirmation and a host family profile;
 - iii. A certified copy of the student's passport;
 - iv. A certified copy of the nominated guardian's identification containing both a photo and signature (e.g. passport, driver's licence or official ID card).
- e) The student must reside in their approved homestay as soon as they arrive in Australia, which must be no later than the Monday of week one (1).
- f) The student must live in the SIBT Approved Homestay Provider until 18 years of age or for seven (7) days after the end date of the student's CoE, whichever is earliest.
- g) SIBT will nominate the start and end dates of welfare responsibility and complete and sign the CAAW letter and provide a copy to the student.

6.4 Changes to Living Arrangements

- a) If a current SIBT student in homestay wishes to change their living arrangements (other than to another homestay provider) after the Student Visa has been granted, the student must apply to DHA for approval. Students will be required to refer to DHA and complete the necessary documentation for nomination of a student guardian.
- b) If a current SIBT student wishes to transfer to another Approved Homestay Provider, the parent(s)/legal custodian must enter into a new agreement with the new provider and provide SIBT with the copy of the agreement in order to approve the accommodation and update the Under 18 Tracking Sheet with the new Homestay Provider information.
- c) Students must stay with their approved homestay provider until changes are approved.

7. Monitoring and Terminating Arrangements

7.1 Support and Monitoring Arrangements

- a) SIBT ensures the welfare of underage international students, who are under CAAW, is maintained at all times, and will:
 - Navitas HR will:
 - i. Monitor staff's WWCC to ensure that any adult involved in providing international student accommodation or welfare arrangements meet the requirement to have a current WWCC clearance; and
 - Admissions and Student Services will:
 - i. Obtain host profiles from the Approved Homestay Provider; and
 - ii. Obtain recent inspection reports verifying the appropriateness of the accommodation during the admission process and then at least every six (6) months to verify that international student accommodation is appropriate to the student's age and physical needs; and
 - iii. Notify the police and any other relevant agencies as soon as practicable if unable to contact an international student and there are concerns for their safety and welfare; and
 - iv. Report to DHA through PRISMS if SIBT is no longer able to take responsibility for the international student's welfare; and

- v. Make all efforts to contact an underage international student's parent or legal custodian immediately if they can no longer provide their approval of the international student's welfare.
- b) All international students under 18 years of age with a CAAW are required to sign the Under 18 Support Plan and attend an appointment with the Under 18 Coordinator at least five (5) times per study period, or as requested by the Under 18 Coordinator, so that their welfare and academic progress can be regularly monitored. The appointments allow students to identify and discuss problems they may be experiencing with their living arrangements, studies, health, or any other personal issues.
- c) The student must provide written approval from the student's parents or legal custodian, and SIBT in order to stay overnight at an address other than the address of the homestay family. Permission is granted at the discretion of SIBT.
- d) Any changes to the student's current enrolment and study plan will be considered and will require written permission from the parent or legal custodian.
- e) In some cases, classes and assessment may be scheduled at night. In cases where a student under 18 feels they may be vulnerable to a degree of risk by having to attend an evening class or assessment activity, they should contact the Under 18 Coordinator or a Student Learning Advisor to make alternative arrangements.
- f) Students returning home must provide evidence to SIBT of issued flight tickets to their home country. Students must have written approval from SIBT and in some cases from the parent/legal custodian to travel to and from the airport.
- g) SIBT will liaise with parent/legal custodian, or homestay families regarding any issues that may be affecting the wellbeing of students with a CAAW in place.
- h) If SIBT suspends or cancels the enrolment of a student, SIBT will continue to check suitability of care arrangements until:
 - i. The international student has alternative welfare arrangements approved by another registered provider; or
 - ii. The international student has a nominated guardian approved by DHA; or
 - iii. The international student leaves Australia; or
 - iv. The registered provider has notified DHA through PRISMS that it no longer approves of the international student's welfare arrangements; or
 - v. The international student turns 18 years of age.

7.2 Terminating Welfare Arrangements

- a) SIBT's responsibility for welfare arrangements can only be terminated in the following circumstances:
 - i. Alternative welfare arrangements have been put in place. In this circumstance, SIBT will confirm that the new welfare arrangements are DHA approved and formally in place before terminating the CAAW letter (Please refer to section 6.4).
 - ii. SIBT can no longer take responsibility for the international student due to following reasons:
 - An international student has refused their accommodation or left their accommodation without notice, even after SIBT has exhausted all possible avenues of assisting the international student to maintain appropriate arrangements;

- The homestay/accommodation provider is unable to maintain the arrangements and other homestay arrangements cannot be made;
 - An international student's enrolment has been suspended or cancelled;
 - An international student has gone missing from their accommodation and cannot be found or contacted, even after SIBT has implemented steps under its [Critical Incident Policy](#).
- b) SIBT will report the international student to DHA within 24 hours using the 'Non-Approval of Appropriate Accommodation/Welfare Arrangements' letter through PRISMS, if any of the events outlined in section 7.2 a) ii occur. This may lead to cancellation of the international student's visa.
- c) SIBT endeavours to ensure the international student's parents or legal custodians are notified immediately if SIBT can no longer take responsibility for the international student's welfare.
- d) SIBT's responsibility for accommodation and welfare arrangements of an international student will cease when the international student turns 18. The requirements of Standard 5 of the National Code will no longer apply at this point.

8. Critical Incident Management

- a) SIBT will adhere to the relevant Commonwealth and NSW State Legislation and other regulatory requirements relating to child welfare of enrolled students under 18 years.
- b) In the event of a critical incident involving an international student under 18 years under a CAAW with SIBT, staff will follow approved procedures as per the [Critical Incident Policy](#).

9. Transferring between Education Providers

- a) If an international student under 18 years of age with an active SIBT approved CAAW arrangement in place, gains approval to Transfer to another Provider, then:
- i. The parent(s)/legal custodian will arrange suitable accommodation and welfare support in consultation with the new education provider and inform the Under 18 Coordinator.
 - ii. SIBT will ensure that:
 - The other education provider has obtained written confirmation that the student's parent(s)/legal custodian supports the transfer; and
 - The other education provider has established welfare arrangements for the student; and
 - DHA has been notified of the change in the approving institution for the student's accommodation and welfare arrangements.
- b) Upon admission of an international student who is under 18 years of age and who has CAAW arrangements, SIBT will:
- i. Negotiate the transfer date for welfare and accommodation arrangements with the releasing education provider to ensure there is no gap;
 - ii. Contact the previous provider to verify and ensure that the student always has appropriate welfare and accommodation arrangements in place;
 - iii. Issue the new CAAW letter, which will cover the transition from one welfare and accommodation arrangement to another, if applicable;
 - iv. Communicate to the student that they must:



- Maintain their current welfare and accommodation arrangements until the transfer date; or
- Have alternate welfare and accommodation arrangements approved; or
- Return to their home country until the new approved welfare and accommodation arrangements take effect.

10. Students with a Package Offer

- a) International students under 18 years of age will only be accepted for a package offer if the partner institution accepts international students under 18 years of age.
- b) The SIBT Admissions Team is responsible for establishing whether an international student will turn 18 years of age by the completion of the SIBT program. In cases where a student would not have turned 18 years of age, SIBT will inform the parents in writing of the partner institution policy prior to accepting the student.
- c) SIBT will not take responsibility for the student's welfare and accommodation arrangements beyond the end date specified on the CAAW letter.
- d) SIBT will cancel international student's CAAW, if the student returns to their home country in between the packaged programs.

11. Reporting

- a) The Student Services Manager will report to the Senior Management Team on SIBT student support initiatives for international under 18s, complaints and outcomes, Homestay providers compliance with the written agreement and incident management and any identified issues with along with SIBT compliance with this policy.

12. Monitoring and Review

- a) SIBT monitors the effectiveness and appropriateness of the accommodation and welfare arrangements for international students under 18 years of age to facilitate the identification of continuous improvement opportunities and risk identification and mitigation.
- b) This Policy is reviewed by the Responsible Officer and the Quality and Compliance Manager a minimum of every 3 years or when required to ensure alignment with regulatory compliance requirements, legislation, regulation, and guidelines.