

# Navitas English Under 18 Students Policy and Procedure

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Key Stakeholders	All Navitas English staff and all under 18 students
Related Polices	<i>Navitas English Student Deferral, Suspension, Withdrawal and Refund policy</i>
Standards	National Code 2018 - Standard 5 ELICOS Standards P2 – Younger Students

## Version Control

Issue Date:	Summary of Changes	Review Date
2 January 2018	Policy re-issued to account for National Code 2018	2 January 2020
2 January 2020	Revised to change role title of key managers	2 January 2022
9 September 2021	Revised to account for centre closures and reformatted for Navitas Policy Hub	9 September 2023
9 September 2023	Policy revised to incorporate U18 accommodation policy and procedures, and a title change from <i>Younger Overseas Students</i> to <i>Under 18 Students</i>	9 September 2025

## Purpose

This policy and procedure document outlines Navitas English’s obligations in the support of the enrolment and welfare for international students under the age of 18 during their study period. This policy and procedure document is committed to abiding by the:

- 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

- Commonwealth Child Safe Framework
- In NSW, the Children and Young Persons (Care and Protection) Act 1998
- In WA, the Children and Community Services Act (2004)

## Scope

This policy and procedure document refers to all international students enrolled, or intending to enrol, in any of Navitas English's courses (CRICOS Provider: 00289M) who are under 18 years of age (U18) at their course commencement date, and, to all Navitas English staff.

Navitas English's minimum age is strictly 16 years old at the time of course commencement and for all its mainstream courses unless for students studying as part of a 'Study Tour' group and non-student visa holders, whereby the minimum age is 13 (refer to section 9 of this policy).

For all U18 international students and Navitas staff, this Policy and Procedure document outlines:

1. Welfare arrangements during enrolment (pre-arrival & non-arrivals)
2. Carer arrangements
3. Homestay accommodation arrangements
4. Safety, wellbeing and contact and reporting provisions
5. Working with Children Check (WWCC) management
6. U18 critical incident management
7. Changes to U18 welfare arrangements
8. Study and course related matters
9. U18 tourist visa students and group study tours

### 1. Welfare arrangements during enrolment (pre-arrival)

The Navitas English application form requires detail for any U18 prospective student applying to study. On receipt of this application form, the Navitas English Admissions team sends the parent or legal guardian the U18 guardianship form which requires them to select an option:

Declaration A: for the U18 student to live in Navitas English-organised accommodation, with Navitas English providing support and general welfare.

Declaration B & E: for the U18 student to live with a parent or legal guardian.

Declaration C & E: for the U18 student to live with an eligible relative (as defined by DHA)

Declaration D & E: for the U18 student to live with a parent-approved and parent nominated adult (not available for student visa holders).

Admissions collects all relevant documents required for each option such as passport identification, police checks and visas.

For Declaration A and U18 students applying for a student visa, Navitas English arranges appropriate accommodation (in partnership with the Australian Homestay Network, AHN) and a

Navitas English Carer. Navitas English then completes and signs the Confirmation Of Appropriate Accommodation and Welfare (CAAW).

*(Refer to Navitas English's U18 guardianship form)*

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

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

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

### **Non-arrivals**

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

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

## **2. Carer arrangements**

For declaration A (for the U18 student to live in Navitas English-organised accommodation, with Navitas English providing support and general welfare), a Navitas English employed Carer is assigned. To commence employment, a Carer must:

- Be interviewed for suitability by the Student Services & Experience Manager (SSEM) and the Centre Manager and Director of Studies (CM-DoS)
  - Provide both a working with children check and national police check clearance
  - Provide 2-character references for Navitas English to contact
  - Agree to the terms, conditions and commitments and sign the Carer agreement
1. The duties as Carer are to be in regular contact with the student, meet with the student face-to-face fortnightly at the provider premises to provide support and report on the student's welfare to the student services manager, both fortnightly and via a monthly welfare report. The Carer WWCC details are recorded and updated in the WWCC register as per section 5. Working with Children Check (WWCC) management.

*(Refer to Navitas English's Carer Agreement)*

### 3. Homestay accommodation arrangements

For declaration A (for the U18 student to live in Navitas English-organised accommodation, with Navitas English providing support and general welfare), Navitas English partners with the Australian Homestay Network (AHN) to provide homestay accommodation with local families. The Homestay Agreement outlines commitments between parties and AHN policies and procedures align with the National Code 2018 - Standard 5 and ELICOS Standards P2 – Younger Students.

Navitas English first signs the Confirmation of Appropriate Accommodation and Welfare (CAAW) before a student can be issued a study visa. A Confirmation of Enrolment (CoE) is issued at the same time. The student will be issued with the address of their AHN homestay family prior to the issue of these documents. Where a student has applied for homestay and been informed of the address, Navitas English takes responsibility for the student when signing the CAAW letter required prior to visa issue.

The CAAW must start from the date of commencement of the student's COE and end 7 days after the end of the student's course (the length of CoE plus 7 days or more), or when the student turns 18, whichever is earlier. A student may not be permitted to travel to Australia before their welfare arrangements are in place, the CAAW should provide appropriate time (usually within 7 days) prior to the commencement of the student's course to allow them to come to Australia and settle into their homestay accommodation. The student must abide by these dates and request with Navitas English for an extension of the CAAW if they plan to arrive more than one week prior to the start date.

#### **Selecting, screening, and monitoring AHN as sole third party to U18 accommodation**

Navitas English partners with AHN as a sole third party in providing quality homestay accommodation to all students who require a homestay. Upon signing a homestay agreement with AHN and in the continuation of the partnership, Navitas English undertakes the following measures:

- checks that AHN policies & procedures comply with all obligations as required under the ESOS regulatory frameworks such as the National Code 2018 and are compatible with Navitas English policies.
- 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.

- Shared access to the AHN portal which houses all relevant information such as family and student profiles and contact and payment details.
- Navitas English assesses both reputational and qualitative feedback from its stakeholders such as its agent network and from students who are surveyed in their first 2 weeks of homestay and in quarterly student online evaluations.
- External endorsement is taken into account with such stakeholders as English Australia and NEAS (of which AHN is currently a NEAS endorsed accommodation provider)

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

Navitas English's SSEMs have access to homestay placement reports and essential detail through the AHN management portal. This includes details of all the family members and when the homestay was last inspected by AHN. Family WWCs can be requested at any time by Navitas English for verification.

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

*(Refer to the AHN and Navitas English Homestay Agreement)*

*(Refer to AHN verification of appropriate accommodation for U18 students document)*

### **Ensuring accommodation is suitable for U18s**

Students are required to complete a homestay preference form at least 4 weeks prior to their first intended day of stay which is reviewed by the SSEMs before being submitted into the AHN portal for AHN to then match the placement with an appropriate homestay family. The preference form determines:

- 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

Once AHN find the most suitable homestay family match according to the student's preference form, a placement report is created and sent to the relevant SSEM 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 by AHN
- 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. The SSEM cross checks the detail of the family against the student's preferences and if satisfied with the match, will send the placement report to the student and parents/legal guardians via email. Both Navitas English and the student/parent/legal guardian may direct (via Navitas English), AHN to find an alternative family should there be reasonable grounds for them to do so.

### **Ensuring suitability of accommodation for U18 every 6 months**

AHN have a documented procedure for placing students with host families. The full policy can be found at this link: [Student Placement Policy](#). All AHN homestays need to sign an agreement to host international students which requires a physical inspection of their home.

In addition, when placing an U18 student AHN will contact the host to:

- Confirm that there are no changes to the residence on file, including other international students, and ensure the home is compliant with AHN placement policy (around genders/ number of students in the home).
- Ensure the room is ready and appropriate for the student and confirm that the host (or an approved adult) will be home for the student's arrival. Let them know they will receive the AHN [Arrival Checklist](#) via email to assist with a smooth arrival.
- Provide the host with key information about the student and their culture and ensure they are the right match.
- Remind them of their obligations for hosting U18's and that they can contact AHN 24 hours a day, 7 days a week if they have any concerns about the student's wellbeing.
- Advise the host of any special requirements of the Education Provider or Guardian (including any requests to conduct a home inspection)

The AHN placement report states the date of the last physical inspection of the homestay which is checked by the relevant SSEM. Navitas English checks that the home has had an inspection no longer than 12 months previous to the student's first day of stay. AHN conduct comprehensive screening during the host application which prioritises student are placed in a safe and welcoming environment. This screening includes that all hosts have a valid WWCC appropriate to the state in which Navitas English operates and for every permanent resident in the home who is over 18.

*(Refer to AHN's verification of appropriate accommodation for U18 students)*

All U18 students (unless part of a Group Study Tour so non-student visa holders) are assigned a Navitas English Carer who meets the student face-to-face on campus in the student's first week of study and very fortnight thereafter as part of the carer agreement. The Carer asks the student about their welfare, including accommodation, and emails the SSEMs after each fortnight. The SSEM follows up with the student if there are any questions or concerns. In addition, the Carer, in conjunction with the CM-DoS, provides a report to the student and their parents/legal guardian which outlines both their academic progress and assessment of their welfare.

SSEM also surveys U18 student about their homestay in the first 2 weeks of their stay and at the end of their stays. In addition, Navitas English conducts quarterly online evaluations which ask students for feedback of their experiences in their homestays (if applicable to them).

Students have access to the Student Services & Experience Accommodation Officer (in addition to the SSEM and CM-DoS s primary contacts) in each centre between 9am-5pm Monday to Friday to discuss any concerns that they may have with regard to homestay. Students also have on-campus access to counselling and other advice during business hours. Outside business hours, students (and hosts) are asked to call the 1800 NAVITAS student assistance line for advice and assistance.

## 4. Safety, wellbeing, contact and reporting provisions

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

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

This information is provided in the Student Handbook (refer to Your Safety section and Information for U18 Students section) which is emailed to all students pre-arrival. During Day One orientation, students meet key staff, observe power point presentations, and participate in a campus tour which notes the location of key staff members' offices.

### **During business hours**

Included in the Under 18 section of the Student Handbook are the full names, email addresses and centre contact numbers for the Centre Manager and Director of Studies (CM-DoS) and the Student Services & Experience Manager (SSEM) as the primary contacts and:

### **Outside business hours**

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

### **External service provider support lines**

- Kids Help Line 1800 551 800 (24 hours/7 days) - counselling, information and referrals for young people

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

#### **Navitas English has:**

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

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

#### **Assistance for students**

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

All reports of alleged or actual abuse are referred to the Navitas English primary contacts to be thoroughly and sensitively investigated, resolved, and reported to authorities as required, under Commonwealth and State legislation.

#### **Counselling**

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

Navitas English provides welfare and personal counselling for students to support them during their stay with us. Students can see the Centre Manager & Director of Studies, Student Services & Experience Manager or a Senior Teacher about a range of matters related to settling into life in Australia, including homesickness, social interactions and Australian culture. At least 2 Navitas English centre staff hold a valid First Aid Mental Health certificate and at least 2 Navitas English staff hold a valid First Aid certificate.

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

#### **Mandatory reporting**

For U18 students living in Navitas English-organised accommodation, with Navitas English providing support and general welfare, Navitas English is ultimately responsible for ensuring that



its staff, students, carers and AHN as third-party homestay providers, know 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. They will decide whether an investigation is required.

Navitas English communicates mandatory reporting to:

- all students in day one orientation and in the student handbooks
- all staff during onboarding, including the teacher induction handbook
- to its Carer's as per the signed Carer Agreement
- as all homestay hosts via AHN policy

[AHN sexual harassment and abuse prevention policy](#)

*(Refer to Navitas English student handbooks)*

### **Absences from school and homestay process**

Navitas English has a strict procedure for monitoring U18 student school absences as follows:

- Teachers' class roles have all U18 students clearly highlighted
- Teachers notify senior teachers via a link on their rolls to a central report (checked by senior teachers daily) identifying any U18 student who has been absent for one full day of study
- Upon notification, the senior teacher calls the student as soon as practicable (same day) to check welfare. If no response, the student is sent a text asking them to reply to confirm they are safe and well (or to provide an explanation otherwise)
- If no contact is made, the senior teacher notifies either the SSEM or CM-DoS as the centre's primary contact who will call the student again as soon as practicable (if not the same day, no later than the following day).
- If no contact is made, either the SSEM or CM-DoS will contact one of the following contacts (who depends on factors such as location and who has been provided at the application stages) : the emergency contact, the carer, the parent or legal guardian, a homestay parent, the agent, known friend of the student.
- If no contact or update is provided still, either the SSEM or CM-DoS will contact the police

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

AHN hosts who are unable to contact a younger student, who have concerns for the student's welfare, are directed to contact AHN staff during business hours, AHN's 24/7 emergency number, and the police as appropriate.

Where an under-18 student is missing from their homestay accommodation and cannot be contacted, Navitas English will implement its Critical Incident Management Policy and inform the student's parents and place a missing person report with police if requested by the parents.

*(Refer to Navitas English Critical Incident Plan)*

### **Maintenance of up-to-date contact details for students, parents, hosts, legal guardians and any adult responsible for the student's welfare**

- Students are asked to notify Student Services of any changes they make to their contact details as soon as new details are known. The assigned Carer checks the student contact details are the same during the fortnightly visits.
- Contact details for the parents of younger students are provided to Student Services at the time of enrolment and noted in the SMS.
- Additional contact details for any responsible adult that the parents would like listed on the student's record are collected at Registration or soon after the student's commencement at Navitas English.
- Following registration and reconfirmation that each student's contact details are correct, an upload is made to PRISMS.
- Contact details for students who are living with a DHA's approved 'suitable relative' are collected at the time of enrolment and checked at the commencement of the student's studies.
- Contact details for AHN homestay hosts are provided to students and their families prior to their arrival via the homestay placement report
- All students are required every 5 weeks to confirm that their contact details in the SMS are current and correct. Updates notified by the student are uploaded into the SMS.

## **5. Working with Children Check (WWCC) management**

Navitas English staff with direct student-to-staff interactions are required to hold a valid Working with Children Checks from the relevant State or Territory. This therefore includes:

- all teachers and the senior academic team members
- all student services staff including the SSEM
- the CM-DoS

Procedure for these Navitas English staff:

- A valid WWCC is listed as a mandatory requirement when vacancies are advertised
- Navitas' HRM 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 HRM team, will notify the CM-DoS or SSEM 8 weeks in advance of when an employee WWCC will expire.
- The CM-DoS or SSEM will contact the employee instructing them to renew their WWCC
- The CM-DoS or SSEM will send the renewed WWCC to HRM team who will update this in iChris.
- With each new employee and WWCC renewal, the WWCC register is updated and allows for cross checking and transparency for auditing purposes.

The above procedure ensures that there is no gap between each WWCC for each Navitas English employee.

*(Refer to Navitas English's WWCC register)*

As Navitas English's third-party partner, under AHN homestay host policy, all homestays are required to have valid Working with Children Checks from the relevant State or Territory. Prior to each U18 student is due to be placed with an AHN 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 at times will need to be renewed if WWCC expires during the student's stay).

## 6. U18 critical incident management

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

Where an under-18 student is missing from their homestay accommodation and cannot be contacted, Navitas English will implement its Critical Incident Management Policy and inform the student's parents and place a missing person report with police if requested by the parents.

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

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

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

- temporary placement with an alternative homestay host if there is a space available.
- temporary placement with a friend, family friend or relative approved by the 1800 NAVITAS emergency phone contact.

*(Refer to Navitas Critical Incident Plan)*

Navitas English acknowledges its duty of care to AHN 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

Centre Managers or senior team as per the Critical Incident policy and/or the police may be called on to assess the situation and may direct what occurs next.

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

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

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

## 7. Changes to U18 student welfare arrangements

### **Early notification to DHA of changes to U18 students' welfare arrangements**

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

- Navitas English receives appropriate confirmation that the student will be cared for by a parent or suitable relative approved by DHA;
- The parents/guardians inform Navitas English 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 or guardians request the cancellation of the student's enrolment in order that the student leaves Australia and/or returns home.

In each of the above circumstances, Navitas English will inform 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.

### **Early notification to parents of changes to students' welfare arrangements**

In the event that Navitas English 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, Navitas English 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**

Navitas English reserves the right to suspend or cancel an overseas student's enrolment for reasons outlined on the Navitas English Conditions and Enrolments and in the student code of conduct which is provided to all student in the Student Handbook.

In the event of a suspension or cancellation of enrolment of a student on a student visa who is U18, Navitas English will continue to approve the welfare arrangements of the student as per the Navitas English Student Deferral, Suspension, Withdrawal and Refund policy

*(Refer to the Navitas English Student Deferral, Suspension, Withdrawal and Refund policy)*

*(Refer to Navitas English student code of conduct)*

### **Transferring welfare arrangements for U18 students- Negotiating welfare transfer dates to ensure no gaps**

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

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

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

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

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

## **8. Study and course related matters**

For U18 students enrolled in Navitas English mainstream courses (so not part of group study tour), the minimum age on course commencement is strictly 16 years old.

Navitas English runs four mainstream courses: General English, IELTS preparation, Cambridge Preparation and Academic English. For General English, IELTS preparation and Cambridge Preparation, the syllabi used are all from major commercial textbook publishers from either Pearson, Cambridge or Oxford press. The content and teaching of these commercial textbooks are designed and suited for young adult to mature students from elementary to advanced levels 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
- teacher induction and ongoing professional development include younger learners aspects to ensure that instructions, language, and topics are suited to the age range at Navitas English.

Navitas English has developed its own Academic English courses for which the same principles apply.

U18 student visa holders are included in the scope of other Navitas English policies including course progress and attendance and can be reported for non-compliance. Factors such as reporting timeframes will adhere to the ESOS Act and National Code. Academic progress, welfare and attendance is reported to the parents or legal guardian via a monthly report and Navitas English will endeavour to communicate any risk of non-compliance as soon as possible in order to prevent a reporting situation from occurring.

## 9. U18 non-student visa holders and group study tours

Navitas English hosts a number of group study tours of which the minimum age is 13 years old. All students aged between 13-15 years old must be part of a study tour group with the strict minimum age of 16 for all mainstream courses as per section 8 of this policy.

Study tour group students are tested and placed in 'closed' courses, typically 3-4 weeks in duration, which means that the class/course includes only the younger learners for that particular group. Navitas English has tailor made study tour materials to develop a curriculum suited to the relevant age groups learning needs and through themes and language which are more suited to young teens, such as STEM influenced models of learning and functional language to support their needs such as asking for directions and shopping in supermarkets.

Teachers assigned to study tour closed classes often have prior experience teaching younger age groups and are provided training on the curriculum and in how to engage and supervise accordingly.

Occasionally, Navitas English will enrol an individual U18 student on a tourist visa. Our policy is to apply the same welfare responsibilities and procedures as U18 student visa holders with the following exceptions:

- As per section 1 of this policy, an U18 student on a tourist visa can live with a parent-approved and parent nominated adult (in addition to a parent, legal guardian or eligible relative). In such cases, a Navitas English Carer or AHN U18 homestay may not be required.
- Navitas English, if arranging accommodation and welfare, may be required to complete a 1257 form (and not a CAAW) on behalf of the student's parent or legal guardian.

## 1. Responsibilities

The **Director, Centre Operations** (DCO) is responsible for:

- Overall implementation of the National Code Standard 5

The Director, Centre Operations, Centre Managers & Directors of Studies, Student Services & Experience Managers and the Student Services teams, are responsible for the implementation of Standard 5 of the National Code.

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

- Student Services & Experience Managers (SSEMS)
- Student Services & Experience Officers (SSEOs)

## 2. Definitions

- DHA** : Department of Home Affairs
- SMS** : Student & host records management system (currently eBecas)
- ESOS Act 2000** : The Education Services for Overseas Students Act 2000.
- National Code 2018** : The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Student 2018.
- Principal Course** : The final or highest level of study to be undertaken by student
- AHN** : The Australian Homestay Network

## 3. Review

This template document is reviewed every 2 years by the relevant manager to ensure alignment to appropriate strategic direction and its continued relevance to Navitas English's current and planned operations. The next scheduled review of this document is listed in the Version Control section on Page 1.

## 4. Compliance

This policy complies with;

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

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

## 5. Related documents

- *Navitas English's U18 guardianship form*
- *Navitas English's Carer Agreement*
- *AHN and Navitas English Homestay Agreement*
- *AHN verification of appropriate accommodation for U18 students document*

- *Navitas English Critical Incident Plan*
- *Navitas English Student Deferral, Suspension, Withdrawal and Refund policy*
- *Navitas English student code of conduct*