

These Procedures support the [Underage Student \(Minors\) Policy](#)

Procedures Owner: College Director and Principal

Keywords: Underage Students, Minors, Welfare, Accommodation

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1. INTENT

- 1.1 These Procedures provide the operational guidelines Edith Cowan College will follow to:
- a) support all Underage Students (Minors) at the College;
 - b) confirm that Underage Students (Minors) living in Australia with relatives have had their welfare and accommodation arrangements approved by the Department of Home Affairs (DHA); and
 - c) manage welfare and accommodation arrangements for unaccompanied International Underage Students (Minors).

2. ORGANISATIONAL SCOPE

- 2.1 These Procedures apply to all Edith Cowan College current and prospective Students under the age of 18.

3. DEFINITIONS:

- 3.1 The [Glossary of Policy Terms](#) applies to this Policy.

4. PROCEDURES CONTENT:**Admission**

- 4.1 ECC's application process will take into consideration the need for Students to be eighteen (18) years of age to start at Edith Cowan University.
- 4.2 Prior to issuing a Letter of Offer to a prospective International Student, Admissions Staff will ensure that the Student will be seventeen (17) years old when they start their Course at ECC and will be eighteen (18) years old at the start of Orientation Week when they begin their Course at Edith Cowan University.
- 4.3 In relation to all Underage Students (Minors), Admissions Staff will save copies of all relevant documents in the Student file.
- 4.4 For International Underage Students (Minors) Admissions Staff will require applicants and their parent or legal guardian to:
- a) complete and submit the necessary documentation relating to welfare and accommodation requirements;
 - b) pay for Overseas Student Health Cover (OSHC) or provide evidence of and information pertaining to OSHC arranged by the Student's parents or legal guardian;

Welfare and Accommodation Arrangements for International Underage Students**Unaccompanied Minors**

- 4.5 For unaccompanied Underage Students (Minors), ECC will ensure that welfare and accommodation arrangements commence at least fourteen (14) Calendar Days before the start of classes and cease when the Student:
- a) turns 18;
 - b) has alternate welfare and accommodation arrangements approved by the Department of Home Affairs;
 - a) is Withdrawn from their Course by their parent or legal guardian;
 - d) leaves Australia;
 - e) is reported for breach of visa conditions;
 - f) Transfers to another Provider with appropriate welfare and accommodation arrangements in place; or
 - h) is reported by ECC to the Department of Home Affairs because the College is no longer able to approve the student's welfare and accommodation arrangements or because it has not been able to contact the Student.
- 4.6 The steps that need to be followed to secure ECC-approved welfare and accommodation arrangements for unaccompanied Minors are:
- a) **Step 1.** Parents or legal guardians will contact the [Australian Homestay Network](#) (AHN) to arrange accommodation for their child.

- b) **Step 2.** Parents or legal guardians will contact the ECC-approved welfare services provider, [International Student Alliance \(ISA\) Student Advocates](#) (ISA Student Advocates) to arrange welfare services for their child.
- c) **Step 3.** Parents or guardians will submit to admissions@ecc.edu.au:
 - i. a signed and completed *Underage Student (Minor) Parent/Legal Guardian Welfare and Accommodation Arrangements Form* which includes the *Edith Cowan College-Approved Underage Student (Minor) Welfare and Accommodation Arrangements Terms and Conditions*;
 - ii. a certified copy of the parent or legal guardian's identification with photo and signature, such as a passport, driver's license or official ID card. If the identification is not in English, certified English translated copies must be provided.
 - iii. evidence of a signed Homestay provider agreement and proof of payment to AHN; and
 - iv. evidence of a signed ISA Student Advocates agreement and proof of payment to ISA Student Advocates.
- d) **Step 4.** Once accommodation and welfare arrangements are confirmed by ECC and all relevant documents have been received, ECC Admissions will issue a *Confirmation of Enrolment (CoE)* and *Confirmation of Appropriate Accommodation and Welfare (CAAW)* letter to the student and the parent or legal guardian.

DHA-Approved Welfare and Accommodation Arrangements

- 4.7 International Underage Students (Minors) who will be living in Australia with a relative approved by the Department of Home Affairs (DHA) will submit the following to admissions@ecc.edu.au:
- a) a signed and completed *Underage Student (Minor) Parent/Legal Guardian Welfare and Accommodation Arrangements Form*;
 - b) evidence of approval of welfare and accommodation arrangements by the Department of Home Affairs; and
 - c) a certified copy of the parent or legal guardian's identification with photo and signature, such as a passport, driver's license or official ID card. If the identification is not in English, certified English translated copies must be provided; and
 - d) a certified copy of the DHA-approved Australian-residing legal guardian's visa status and identification with photo and signature, such as a passport, driver's license or official ID card. If the identification is not in English, certified English translated copies must be provided.
- 4.8 Once ECC has received the documents listed in Clause 4.7, it will issue a Confirmation of Enrolment (CoE) for the Student.

Orientation and Onboarding of Underage Students (Minors)

- 4.9 All Underage Students (Minors) will be provided with an Orientation program and onboarding process that includes information about:
- a) their rights and obligations;

- b) Health, Safety and wellbeing, including emergency processes, services and contact people on and off campus;
 - c) how to maintain personal safety and how to Disclose or Report Sexual Assault or Sexual Harassment;
 - d) how to complain about ECC services or products via the [Complaints Policy](#), how to lodge a Student Appeal under the [Student Appeal Policy](#) and how to request a Review under an academic Policy;
 - e) the Student Counsellor's services and role; and
 - f) the [Underage Students \(Minors\) Policy](#) and these Procedures.
- 4.10 In addition to Orientation, Underage Students (Minors) will be invited to social events by SAS Staff to encourage social interaction and the formation of friendships with other Students.
- 4.11 SAS Staff will consider the needs and vulnerabilities of Underage Students (Minors) when planning social events for Students.
- 4.12 Student and Academic Services (SAS) will identify all new unaccompanied Underage Students (Minors) at the start of the Study Period / ELICOS Course and will email the list of Students to the Student Counsellor, who will then arrange an initial one-on-one meeting.
- 4.13 During the initial one-on-one meeting with unaccompanied International Underage Students (Minors), the Student Counsellor will:
- a) inform them about support services at ECC;
 - b) inform them that the Student Counsellor is their dedicated support person at the College;
- and will remind Students about the requirement to abide by:
- c) their visa conditions;
 - d) Australian federal and state laws and regulations;
 - e) ECC Policies and Procedures;
 - f) the *AHN Code of Conduct for U18s in Homestay* and the *AHN Guest Agreement*; and
 - g) their agreement with ISA Student Advocates.
- 4.14 Academic Program Coordinators will remind Pathway teaching staff and the Director of Studies will remind ELICOS teaching staff, where relevant, at the start of each teaching period about:
- a) obligations ECC holds in relation to all Underage Students (Minors) with reference to the [Principles for Child Safe Organisations WA](#), bearing in mind ECC's classification by the WA Government is that of a private education provider delivering primarily to adults;
 - b) requirements relating to monitoring attendance, academic progression, support and health and safety outlined in the [ELICOS Standards 2018](#), [Foundation Program Standards 2021](#) and the [National Code of Practice for Providers of Education and Training to Overseas Students](#); and
 - c) ECC's [Underage Students \(Minors\) Policy](#) and these Procedures.

- 4.15 ECC will accommodate requests made by Underage Students (Minors), for example to adjust timetabling, where possible and appropriate.

Ongoing Monitoring of and Support for Underage Students (Minors)***Enrolment Status***

- 4.16 If ECC plans to Withdraw, Cancel, Defer or grant a Leave of Absence in relation to an Underage Student (Minor) it will notify parents or legal guardians as per the privacy settings in Navigate.
- 4.17 If ECC plans to Withdraw, Cancel, Defer or grant a Leave of Absence in relation to an unaccompanied International Underage Student (Minor) it will notify:
- a) the Student's parent or legal guardian;
 - b) the AHN;
 - c) ISA Student Advocates; and
 - d) the Department of Home Affairs.

Attendance

- 4.18 SAS Staff will provide Academic Program Coordinators and the Director of Studies with regular attendance reports for all Students in their Courses. An attendance report for unaccompanied Underage Students (Minors) will be sent to the Student Counsellor once weekly.
- 4.19 The Student Counsellor will contact unaccompanied Underage Students (Minors) with poor attendance to check on their wellbeing, to remind them of their attendance obligations and to determine their support needs, such as a referral to the Learning Advisor or additional meetings with the Student Counsellor.
- 4.20 The Student Counsellor will provide ISA Student Advocates with information regarding the attendance of unaccompanied Underage Students (Minors) when requested.
- 4.21 When the attendance of an unaccompanied Underage Student (Minor) falls below 80% the Student Counsellor will inform ISA Student Advocates and will liaise with ISA Student Advocates and the Minor to determine appropriate action to be taken.

ECC Student Email and Use of the Learning Management System

- 4.22 ECC will monitor and respond to Underage Students' use of their ECC Student email and the Learning Management System (Moodle) as per its Early Intervention Strategy outlined in the [Academic Progression Procedures](#) / [ELICOS Progression Procedures](#).

Assessment Submission, Completion and Performance

- 4.23 Following the [Assessment, Moderation and Examination Procedures](#) / [ELICOS Assessment Procedures](#), teaching Staff will monitor the following in relation to Underage Students (Minors):
- a) their completion of and performance in early low-weight Assessments;
 - b) their participation in ongoing Assessments such as quizzes; and
 - c) their academic performance within Units / ELICOS Courses;
- and will:

- a) offer the Student Unit / ELICOS-Course specific support; and/or
- b) offer to refer the Student to a Learning Advisor for additional academic support or the Student Counsellor for personal support.

Academic Progression Status

- 4.24 Once the Board of Examiners has determined the Academic Progression Status for Students, if an unaccompanied Underage Student (Minor) has been placed on Amber, Red or Purple Academic Progression Status, SAS will send the Academic Progression Status letter to the parent or legal guardian as well as to the Student.
- 4.25 SAS will send the ISA Student Advocate a list of Underage Student (Minors) who are on Amber, Red or Purple Academic Progression Status following the Board of Examiners.

Personal and Privacy Settings

- 4.26 When a new account is set up in Navigate for an Underage Student (Minor), a 'Minor' tag is automatically added; this tag automatically disappears when the Minor turns eighteen (18) years of age.
- 4.27 When an Underage Student (Minor) turns eighteen (18) years of age, they will be responsible for updating their Privacy settings in Axis.

Health and Safety Incidents

- 4.28 Where a Health and Safety Incident involving a Student has occurred, including a Critical Incident or an Incident of Sexual Assault or Sexual Harassment, the ECC Staff person reporting the incident will:
 - a) check in Navigate whether the Student is an Underage Student (Minor); and
 - b) if the Student is a Minor, immediately report the Incident to the Student Counsellor, the College Director and Principal and the Quality and Compliance Manager, so that appropriate support is provided to the Student and so that mandatory reporting occurs.

Meetings with ECC Staff

- 4.29 The Student Counsellor can, upon request, be present when an Underage Student (Minor) meets with a member of ECC Staff, for example, during a Formal Review process. Unaccompanied Minors can request their ISA Student Advocate to act as an independent support person.

Monitoring Welfare and Accommodation Arrangements for Unaccompanied Minors

- 4.30 The Student Counsellor will liaise with ISA Student Advocates in relation to the provision of welfare services to ECC's unaccompanied Underage Students (Minors).
- 4.31 ECC will verify the continued suitability of accommodation arrangements for unaccompanied Underage Student (Minors) every six (6) months. ECC may use ISA Student Advocates to conduct this verification.
- 4.32 When there are concerns about the welfare and/or accommodation arrangements for unaccompanied Minors, the College Director and Principal and/or the Student Counsellor will liaise with ISA Student Advocates and may access the ISA Student Management System for information.

- 4.33 When necessary, using the ISA Student Management System, the Student Counsellor will generate lists of ECC Underage Students (Minors) who are currently receiving welfare services, who previously received welfare services and who are pending arrival.
- 4.34 The Student Counsellor will monitor the accommodation arrangements for ECC's Underage Students (Minors) by liaising with AHN.
- 4.35 Student and Academic Services will refer all students under 18 to the Student Counsellor when they are notified of changes in welfare or accommodation.
- 4.36 Unaccompanied Underage Students (Minors) who are experiencing problems or have concerns about the suitability of their welfare or accommodation arrangements will inform at least one of the following:
 - a) the Australian Homestay Network;
 - b) their ISA Student Advocate; and
 - c) the ECC Student Counsellor;
- 4.37 All matters referred to the Student Counsellor will be acknowledged and investigated.

Temporary Changes to Welfare and Accommodation Arrangements

- 4.38 Students may be allowed to temporarily change their accommodation arrangements during a Study Period or Study Period break, provided the following conditions are met:
 - a) the Student notifies the Student Counsellor in writing at least four weeks prior to the end of the Study Period;
 - b) the AHN and ISA Student Advocate have been informed in writing;
 - c) the parent or legal guardian of the student provides written approval of the temporary arrangements.; and
 - d) the Student Counsellor approves the temporary arrangements.
- 4.39 ECC will consider each case individually and will refuse an application where it feels the Student's welfare will be put at risk.
- 4.40 Unaccompanied Underage Students (Minors) must notify the College of any plans to go overseas during the course of their study. Students will need to provide evidence of flight bookings, proof of parental approval and full details of their accommodation arrangements.

Non-Approved Welfare and Accommodation Arrangements

- 4.41 In cases where ECC Staff are unable to confirm appropriate arrangements for welfare and accommodation for unaccompanied Underage Students (Minors), the Student Counsellor will contact the parent or legal guardian to make alternative arrangements.
- 4.42 Where ECC deems the welfare and accommodation arrangements for an Underage Student (Minor) have become unsuitable and all attempts to assist the student to maintain appropriate arrangements have been exhausted, the College will:
 - a) work with AHN and ISA Student Advocates to secure emergency accommodation for the Student;
 - b) inform the parent or legal guardian; and

- c) carry out its regulatory requirements and report the Student to the Department of Home Affairs within twenty-four (24) hours, using the *Non-approval of Appropriate Accommodation/Welfare Arrangements Form* on PRISMS.

Breaches of Welfare and/or Accommodation Arrangements

- 4.43 Where an unaccompanied Underage Student (Minor) has breached curfew arrangements, the Student Counsellor will support ISA Student Advocates as they follow the *ISA Process for Curfew Breach*. The College Director and Principal will manage the breach, as appropriate and with reference to the *Wellness, Health and Safety Policy* and the *Critical Incident and Business Continuity Policy*.
- 4.44 Where ISA Student Advocates and/or AHN and/or ECC have determined that an unaccompanied Underage Student (Minor) has breached a visa requirement, a condition of the welfare or accommodation arrangement or is charged with an offence contravening any law or regulation whilst in Australia, the College will carry out its regulatory requirements and report the Student to the Department of Home Affairs within twenty-four (24) hours, using the *Non-approval of Appropriate Accommodation/Welfare Arrangements Form* on PRISMS.

Welfare and Accommodation Third Party Monitoring

- 4.45 If the Student Counsellor has concerns that ISA Student Advocates is not providing the unaccompanied Underage Student (Minor) with services as outlined in the Agreement, they will notify the College Director and Principal.
- 4.46 If the Student Counsellor has concerns about AHN's services provided to an unaccompanied Underage Student (Minor), they will notify the College Director and Principal.
- 4.47 The College Director and Principal (or Nominee) will conduct an annual review of welfare service provision by ISA Student Advocates, with reference to the service agreement. This audit will include a review of information contained in the ISA Student Management System in relation to ECC Students, such as:
 - a) emergency contact details;
 - b) ISA emergency and Critical Incident management and responses;
 - c) minimum standard contact with the Student, namely every fourteen (14) days;
 - d) minimum standard in-person contact with the Student, namely once in every twenty-one (21)-day cycle;
 - e) report to parent or legal guardian within twenty (20) to thirty (30) days of first arrival regarding accommodation and general welfare as the Student settles in;
 - f) copies of Working with Children Checks of the ISA Student Advocate and any sub-contractors involved with the Student;
 - g) a list of all contact made with the student, including method and dates;
 - h) ongoing reports provided to the parent or legal guardian;
 - i) documents and correspondence relating to the Student; and
 - j) details of any additional support services agreed to by the parent or legal guardian.

- 4.48 The College Director and Principal will arrange for a review of AHN's provision of accommodation services to ECC Underage Students once annually.

Training

- 4.49 The induction process for new Staff will include information about the College's obligations to Underage Students (Minors) with reference to relevant legislation, standards and policies, such as the [*Principles for Child Safe Organisations WA*](#), the [*National Code of Practice for Providers of Education and Training to Overseas Students*](#); ECC's [*Underage Students \(Minors\) Policy*](#) and these Procedures.
- 4.50 Line Managers will train new Staff in role-specific requirements relating to child safety.
- 4.51 ECC will provide all Staff with refresher training on child safety.

Reporting

- 4.52 ECC will report on Underage Students (Minors) to the Academic Council and the Board of Directors as required.
- 4.53 ECC will note in its health and safety reports to the Board of Directors if a Minor was involved in a Health and Safety Incident, Sexual Assault and Sexual Harassment incident, a Critical Incident, a case of Student Misconduct or a Fitness to Study Concern.
- 4.54 ECC will report all Health and Safety Incidents, SASH Incidents and Critical Incidents to Navitas via DoneSafe and ECU via Riskware.

5. RELATED DOCUMENTS:

- 5.1 Relevant to these Procedures are the following documents:

[*Academic Progression Policy*](#)
[*Admissions Policy*](#)
[*Critical Incident and Business Continuity Policy*](#)
[*Enrolment Policy*](#)
[*Privacy Policy*](#)
[*Sexual Assault and Sexual Harassment Prevention and Response Policy*](#)
[*Support for Students Policy*](#)
[*Staff Code of Conduct*](#)
[*Student Conduct Policy*](#)
[*Wellness, Health and Safety Policy*](#)

- 5.2 This Procedures have been developed in line with requirements set out in the:

[*Education Services for Overseas Students \(ESOS\) Act 2000*](#)
[*National Code of Practice for Providers of Education and Training to Overseas Students*](#)
[*Higher Education Standards Framework \(HESF\)*](#)
[*Migration Act 1958*](#)
[*Migration Regulations 1994*](#)
[*Privacy Act 1988*](#)
[*The ELICOS Standards 2018*](#)

6. CONTACT INFORMATION:

For queries relating to this document please contact:

PROCEDURES OWNER	College Director and Principal
ALL ENQUIRIES CONTACT:	Quality and Compliance Manager
TELEPHONE:	6279 1133
EMAIL ADDRESS:	justask@ecc.edu.au

7. APPROVAL HISTORY:

PROCEDURES APPROVED BY:	College Director and Principal
DATE PROCEDURES FIRST APPROVED:	December 2017
DATE LAST MODIFIED:	
REVISION HISTORY:	January 2022. March 2024. Clarification of ECC's requirements for welfare and accommodation arrangements. Addition of ISA Student Advocates. Curfew set and curfew breach procedures outlined. Age requirement for Minors raised to 17.
NEXT REVISION DUE:	March 2026

Appendix 1**ECC Curfew**

Unaccompanied Underage Students (Minors) who are living in Australia under welfare and accommodation arrangements approved by Edith Cowan College will have a curfew of 10:00p.m. seven (7) days a week.

ISA Student Advocates - Process for Curfew Breach

When the accommodation provider notifies ISA the student has not signed in for Curfew, is not present in their room and are not answering their mobile phone, ISA will take the following actions:

1. Caregiver will attempt to communicate with student:**A: Student answers:**

- Check student is safe and find out location and how the student will safely travel back to the accommodation.
- Notify accommodation provider student has been contacted and estimated time of return
- ISA to email provider and advise of circumstances

B: Student fails to answer:

- Ring parents and advise them of breach of the curfew and ISA is unable to contact the student.
- Request parents to attempt to contact their child and seek information of exact location of the student, how the student will travel safely back to accommodation and estimated time of arrival at accommodation, then update ISA staff.
- ISA to update accommodation provider student has been contacted and estimated time of return
- ISA to email provider and advise of circumstances

2. Caregiver or Parents unable to establish contact with student - Considerations:

- Does student have a history of curfew breach
- Is there a genuine concern for the safety and wellbeing of the student
- Contact provider 24Hr number discuss circumstances with provider after hours contact point
- Discuss with parents and provider after hours contact member if a missing persons report should be made to Western Australia Police
- Update ISA management

3. Process for reporting a missing person to Western Australia Police

Contact the police immediately if the whereabouts of someone is unknown and;

- You fear for their safety.
- You have concerns for their welfare.
- You do not need to wait 24 hours before making a report.
- Report a missing person: [Report a Missing Person Western Australia Police](#)
- At a police station
- By phone on 131 444

To assist with the investigation, provide as much information as possible including:

- When and where the person was last seen or heard from.
- A full description of the missing person.
- A recent photograph.
- Places the missing person likes to visit.
- Why they have gone missing, if known.
- Any urgent medical problems, requirements or medications they need.
- Any reasons for your concern about their safety or welfare.
- Names, addresses and phone numbers of friends and associates.

Banking institution and social media details, if known.