

Younger Overseas Students Policy & Procedure

Overseas Students

Current Version: 1.0

Last Updated: March 2026

Updated By: M. Inglis

Document Last Updated: 23/03/2026 8:46:36 AM

Document Modified By: Matthew Thomas

Dataverse ID: f8ecb0e9-8925-f111-88b4-7c1e5262df71

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VERSION CONTROL

Version	Change	Author	Date
1.0	Update: <ol style="list-style-type: none"> i. to new policy template ii. subsumed existing policy/procedures iii. aligned with current CRICOS legislation iv. Based on ISNSW template 	M. Inglis	February 2026

1. NATIONAL CODE REQUIREMENTS

A policy and/or procedure for Younger Overseas Students (Overseas Students) is required in order to demonstrate compliance with the National Code 2018 Education Act.

St Paul's Grammar School Penrith Ltd. is required to provide evidence of compliance regarding the information and practices relating to younger overseas students in line with Standard 5 of the National Code and Section 3.8 of the NESA Guidelines for Approved NSW School Providers Delivering Courses to Overseas Students (November 2020).

2. YOUNGER OVERSEAS STUDENTS

2.01. Policy

St Paul's Grammar School Penrith Ltd. (*'the School'* or *'St Paul's Grammar School'*) meets legislative and other regulatory requirements relating to child welfare and protection in relation to overseas students aged under 18.

The School provides students with emergency contact information and information about how to report actual or alleged abuse.

The School accepts enrolments from overseas students living with a parent or relative approved by the Australian Government Department of Home Affairs.

The School may accept enrolments from overseas students not living with a parent or relative approved by the Australian Government Department of Home Affairs and will accept welfare responsibility for these students.

When St Paul's Grammar School has accepted welfare responsibility for an overseas student by issuing a Confirmation of Appropriate Accommodation and Welfare (CAAW) for the student, the School will ensure the arrangements are suitable and appropriately managed until the overseas student completes their enrolment.

Should a student for whom a CAAW has been issued turns 18 whilst enrolled the School, the student must remain in approved accommodation for the duration of their enrolment.

The School recruits, assesses and monitors welfare and accommodation. Homestay Coordinators are staff members of the School.

The Principal Executive Officer (PEO) is the Principal of St Paul's Grammar School.

2.02. Procedure

2.02.1. Evidence of Compliance A

2.02.1.i. Enrolling students who are under 18 years of age

The Head of International Students Programme will ensure overseas students under 18 years of age are given age-and-culturally-appropriate information during initial orientation including:

- ◆ who to contact in emergency situations, including contact numbers of a nominated staff member and/or other service providers ; and
- ◆ how to seek assistance and report any incident or allegation involving actual or alleged sexual, physical or other abuse.

St Paul's Grammar School provides the following information pre-enrolment:

- ◆ the policy and process for approving the accommodation, support and general welfare arrangements for younger overseas students to prospective overseas students; and
- ◆ accommodation options available.

2.02.1.ii. Contact details of overseas student and parent/legal guardian

During Term 1 and Term 3 during an overseas student's enrolment, the relevant Homestay Coordinators will be responsible for actioning contact with the parent/legal guardian for up-to-date contact details, including:

- ◆ the overseas student's current residential address, mobile number (if any) and email address (if any);
- ◆ contact details of the overseas student's parent/legal guardian or any adult responsible for overseas student's welfare; and
- ◆ who to contact in emergency situations.

The relevant Homestay Coordinator will advise the Enrolments Support Officer of any changes.

Enrolments Support Officer will maintain a record of updated details within the school's internal digital storage.

2.02.1.iii. Accommodation options for overseas students under 18 years of age

St Paul's Grammar School accepts overseas students:

- ◆ who live with a DHA approved parent or relative; and/or
- ◆ whose welfare is approved by the School and who live with selected Homestay providers and/or Host families.

The relevant Homestay Coordinator maintains a list of approved Homestay providers in the school's internal digital storage.

2.02.1.iv. Concerns about or disruption to accommodation and/or welfare for overseas students

If the School enrolls an overseas student under 18 years of age who has welfare arrangements approved by another CRICOS school provider, as the receiving provider the Head of International Students Programme will implement the School's Overseas Student Transfer Policy and Procedures.

The School's [Critical Incident Policy and Procedures](#) and Critical Incidents Policy and Procedures (Overseas Students) include the processes for managing emergency situations for overseas students and/or when welfare arrangements are disrupted for overseas students under 18 years of age.

If a concern arises about the accommodation or welfare of an overseas student under 18 years of age, other policies and procedures will apply such as:

- ◆ the School's [Child Protection Policy and Procedures](#);
- ◆ the School's [Critical Incident Policy and Procedures](#);
- ◆ the School's Critical Incidents Policy and Procedures for Overseas Students; and/or
- ◆ other relevant policies and procedures dependent on the context.

If staff, parents/guardian or homestay (if relevant) are unable to contact a student and have concerns for the student's welfare, the relevant Homestay Coordinators will make all reasonable efforts to locate the overseas student, including by phone and email.

A student is regarded as 'missing' when the School cannot contact or locate a student, and:

- ◆ The absence of the student is inadequately explained
- ◆ There are suspicious circumstances surrounding a student's disappearance
- ◆ There are fears or concerns for the safety and welfare of the student
- ◆ The international student is residing in homestay accommodation and the homestay family is unable to contact or locate the student.

Before determining that an overseas student is missing, the relevant homestay coordinator will attempt to contact the overseas student, using all practicable means (including but not limited to liaising with the homestay family if relevant, contacting the overseas family of the student to engage them in trying to contact their child).

Should the overseas student be identified as missing, the Head of International Student Programme will engage the relevant procedures outlined in the Critical Incident Policy and Procedures: Overseas Students as soon as is practicable and where relevant, the police and any other relevant government agencies as soon as practicable. All other relevant School policies will be implemented.

The Head of International Student Programme will maintain all records related to the incident in the student's file.

2.02.2. Evidence of Compliance B (Confirmation of Appropriate Accommodation and Welfare - CAAW)

2.02.2.i. Working with Children Checks (WWCC)

Where the School has accepted welfare responsibility for an overseas student by issuing a CAAW, the school requires every adult involved in or providing the accommodation and welfare arrangements for the overseas student to have a current NSW WWCC clearance. This is in accordance with the Child Protection (Working with Children) Act 2012 (NSW). Adults living in the same accommodation as the overseas student are considered to be involved in the accommodation and welfare arrangements.

St Paul's Grammar School verifies the WWCC clearances of all adults involved in or providing approved accommodation and welfare arrangements to an overseas student who is under 18 years of age.

Before accommodation is approved, relevant Homestay Coordinator provides the required data to the administration assistant responsible, who verifies the WWCC clearance for all adults involved in the accommodation via the NSW Office of the Children's Guardian website.

The outcome of the verification process is stored on the International Student Program Homestay WWCC Register by the relevant Homestay Coordinator. The WWCC verification documents are uploaded to the internal digital storage of the School by the Assistant to the Office of Business and Finance.

WWCC expiration dates are monitored by the relevant Homestay Coordinator at the beginning of each term.

If an adult involved in or providing accommodation does not have a valid WWCC the School will not approve the accommodation.

If it is discovered that an adult involved in approved accommodation for an overseas student does not have a valid WWCC, the School will no longer approve the accommodation, and the Critical Incident Policy and Procedures for Overseas Students will be implemented.

2.02.2.ii. St Paul's Grammar School approved welfare and accommodation: verification and monitoring

The relevant Homestay Coordinator will verify that the overseas student's accommodation is appropriate to the student's age and needs:

- ◆ prior to the overseas student entering the accommodation
- ◆ at least every 6 months thereafter.

The following process applies to onboarding new homestay providers:

- ◆ Initial query (if applicable) from the potential homestay provider;
- ◆ provision of the Homestay Family Information Handbook and Homestay Family Application Form;
- ◆ if suitable, the relevant Homestay Coordinator will conduct an initial inspection by visiting and completing the Homestay Application Initial Site Visit checklist;
- ◆ verify WWCC for adults over the age of 18 living in the potential homestay;

- ◆ the relevant Homestay Coordinator provides a recommendation to the Head of International Student Programme; and
- ◆ the relevant Homestay Coordinator may request other documentation or use other methods as needed during the accommodation verification process.

The Head of International Student Program will use documentation provided by the relevant Homestay Coordinator, including (i) WWCC clearance, (ii) application form, (iii) results of the initial site visit and Homestay Coordinator recommendation to decide if accommodation is approved.

The decision of the Head of International Student Program is final.

If there is an approved change in accommodation, the Head of International Student Programme will update the overseas student's accommodation details in PRISMS and a new CAAW will be generated. A new approval period will be included in the CAAW.

The Head of international Student Programme will provide the student with the new CAAW and will maintain a copy in the overseas student's file.

The following documentation regarding new homestay families will be stored on the school's internal digital storage by the relevant Homestay Coordinator:

- ◆ Homestay Family Application Form
- ◆ Homestay Application Initial Site Visit checklist (including Recommendation)

After each overseas student's accommodation has been approved, relevant Homestay Coordinator will monitor the accommodation every six months. Monitoring may take the form of:

- ◆ a meeting with the overseas student;
- ◆ phone call to adult/s involved in providing accommodation;
- ◆ a visit to the accommodation; and/or
- ◆ other methods identified to be suitable.

If a concern arises, other policies such as the School's [Child Protection Policy and Procedures](#), the School's [Critical Incident Policy and Procedures](#), or the School's Critical Incident Policy and Procedures for Overseas Students will be implemented as appropriate.

The relevant Homestay Coordinator is responsible for maintaining all records related to accommodation details, verification and approval, and ongoing monitoring in the School's internal digital storage.

2.02.2.iii. Concerns about or disruptions to approved accommodation and welfare arrangements

If the School is no longer able to approve welfare/accommodation arrangements, the Head of International Student Program will make every effort to contact the overseas student's parents/legal guardians immediately.

Contact will be by phone, email, registered post and any other form of communication usually used with that family, including via the International Student Admissions and Family Liaison.

The Head of International Student Program will maintain records of correspondence in the school's internal digital storage.

The Head of International Student Program will contact the Department of Home Affairs (Immigration) within 24 hours in the form required by that department if the School is unable to approve the overseas student's welfare arrangements. Records of contact with Immigration will be stored in the student's file by the Head of International Student Program.

If St Paul's Grammar School suspends or cancels the enrolment of an overseas student, and a CAAW has been issued, the CAAW arrangements remain in place until any of the following apply:

- ◆ the overseas student has alternative welfare arrangements approved by another registered provider;
- ◆ care of the overseas student by a parent or nominated relative is approved by Immigration;
- ◆ the overseas student leaves Australia; or
- ◆ the Head of International Student Program has notified Immigration under National Code Standard 5.3.6 that the School is no longer able to approve the overseas student's welfare arrangements or under National Code Standard 5.5 that it has taken the required action after not being able to contact the overseas student.

The Head of International Student Program will advise Immigration in the form required by that department as soon as practicable if the overseas student will be cared for by a parent or nominated relative approved by Immigration and CAAW is no longer required.

The Head of International Student Program will maintain all records of contact with Immigration which will be stored in the overseas student's file.

2.02.3. Evidence of Compliance C (Department of Home Affairs - DHA)

2.02.3.i. Monitoring the living arrangements of overseas students living with a parent or DHA approved relative

The relevant Homestay Coordinator monitors the living arrangements of overseas students living with a parent or DHA approved relative.

Monitoring will take place every six months and could take the form of:

- ◆ a meeting at the school or at parent teacher evenings;
- ◆ phone call;
- ◆ email;
- ◆ meeting with the overseas student; and/or
- ◆ other methods determined by the relevant Homestay Coordinator.

The relevant Homestay Coordinator maintains records of monitoring accommodation and welfare in each overseas student's file.

If a concern arises, other School policies such the [Child Protection Policy and Procedures](#), the [Critical Incident Policy and Procedures](#), or the Critical Incident Policy and Procedures for Overseas Students will be implemented as appropriate.

2.03. Records Management

Records relating to the various aspects of the Younger Overseas Students Policy and Procedures document are detailed under the relevant sections of this document.