

## Younger Overseas Students Policy and Procedure

### Definitions:

**German School Johannes Gutenberg** is the name of school provider; **CRICOS Provider ID:** 02379D

**German International School Sydney** is the trading name of the school

The **Principal Executive Officer (PEO)** is the Principal. The PEO may delegate a responsibility to an appropriate staff member.

**Homestay** refers to accommodation arranged and monitored by the School's selected homestay provider where a student stays with an Australian host family.

**Homestay Provider** refers to a homestay agency approved by German School Johannes Gutenberg to offer safe, secure accommodation and welfare services to Overseas Students.

**Parent-nominated Homestay** refers to the accommodation of an Overseas Student with a friend or distant relative of the parents. This type of accommodation requires verification, approval and monitoring by the School's selected Homestay Provider.

**DHA approved accommodation** refers to the living arrangement of an Overseas Student with either a parent, a legal custodian or a nominated relative approved by the Department of Home Affairs (DHA) who must be over 21 and of good character.

### Policy

German School Johannes Gutenberg meets legislative and other regulatory requirements relating to child welfare and protection in relation to overseas students aged under 18. This includes compliance with:

- **New South Wales Education Standards Authority (NESA):** Adhering to the NESA requirements for registration and accreditation of non-government schools, including child protection obligations as set out in the Education Act 1990 (NSW), and the NESA Registered and Accredited Individual Non-government Schools (NSW) Manual.
- **Association of Independent Schools of New South Wales (AISNSW):** Following AISNSW guidelines and best practices for the welfare and accommodation of younger overseas students, including compliance with the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth) and participation in AISNSW professional learning and policy updates.
- **Child Protection (Working with Children) Act 2012 (NSW):** Ensuring that all staff and homestay providers hold valid Working With Children Checks and meet the requirements for child safety screening.
- **Children and Young Persons (Care and Protection) Act 1998 (NSW):** Abiding by mandatory reporting obligations and responding appropriately to concerns of actual or suspected abuse or neglect.
- **National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth):** Meeting requirements regarding welfare, accommodation, and support for overseas students under 18, as set out in Standard 5.
- **Other Relevant Legislation:** Including the Education Services for Overseas Students Act 2000 (Cth) and any related regulations governing CRICOS registration, welfare, and accommodation arrangements for younger overseas students.

German School Johannes Gutenberg maintains ongoing review of these requirements and updates its policies and procedures to reflect legislative and regulatory changes, with references to the above standards and evidence of compliance.

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

German School Johannes Gutenberg accepts:

- enrolments from overseas students living with a parent or relative approved by the Australian Government Department of Home Affairs.
- enrolments from overseas students who are at least 15 years of age and not living with a parent or relative approved by the Australian Government Department of Home Affairs and may accept welfare responsibility for these students.

If German School Johannes Gutenberg has accepted welfare responsibility for an overseas student by issuing a Confirmation of Appropriate Accommodation and Welfare (CAAW) for the student, German School Johannes Gutenberg will ensure the arrangements are suitable and appropriately managed until the overseas student either:

- completes their enrolment, or
  - turns 18 years of age, or
  - reaches the end date of the Confirmation of Enrolment (CoE)
- Whichever occurs first.

## Procedure

### Enrolling students who are under 18 years of age

1. The Registrar will ensure overseas students under 18 years of age are given age-and-culturally-appropriate information within the Overseas Student Handbook during the Application Process before finalising the enrolment 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.
2. The Registrar provides information to prospective overseas students within the Overseas Student Handbook as well as during pre-enrolment email communication, including:
  - The policy and process for approving the accommodation, support and general welfare arrangements for younger overseas students; and
  - Accommodation options available, including contact details of approved Homestay providers.

### Contact details of overseas student and parent/legal guardian

1. Every year and at the beginning of the overseas student's enrolment, the Registrar will contact the parent/legal guardian for up-to-date contact details via Compass, 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.
2. The Registrar will enter or approve updated details into Compass and PRISMS.
  3. The Registrar will maintain a record of all relevant correspondence in each overseas student's file.

### **Accommodation options for overseas students under 18 years of age**

1. German School Johannes Gutenberg only accepts overseas students:
  - who live with a DHA approved parent or relative **and/or**
  - whose welfare is approved by German international School Sydney and who live with Host families or in parent-nominated Homestay, both approved and monitored by selected Homestay Providers.
2. The Registrar maintains a list of approved Homestay Providers in the Overseas Student Handbook and on the German international School Sydney's website for Overseas Students.

### **Concerns about or disruption to accommodation and/or welfare for overseas students**

1. If the German School Johannes Gutenberg enrolls an overseas student under 18 years of age who has welfare arrangements approved by another CRICOS school provider, as the receiving provider the Registrar will implement the *Overseas Student Transfer Policy and Procedures*.
2. German International School Sydney's Critical Incidents Policy and the Critical Incidents Policy and Procedure for 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.
3. 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:
  3. Child Protection Policy
  4. Child Protection procedure
  5. Complaints Handling Policy and Procedures
  6. Complaints and appeal: overseas students – policy and procedure
  7. Critical Incidents Policy
  8. Critical Incidents Policy and Procedure for Overseas Students
4. If staff are unable to contact a student and have concerns for the student's welfare, the PEO/Principal will make all reasonable efforts to locate the overseas student, including by phone and email. The Principal will notify the police and any other relevant government agencies as soon as practicable. All other relevant policies including the Critical Incidents Policy applying to all students and the Critical Incidents Policy and Procedures for Overseas Students, Child Protection Policy and Child Protection Procedures will be implemented.
5. The Registrar will maintain all records related to the incident in the student's file.

### **Working with Children Checks (WWCC)**

1. Where German School Johannes Gutenberg has accepted welfare responsibility for an overseas student by issuing a CAAW, the German School Johannes Gutenberg 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 NSW Child Protection (Working with Children) Act 2012. Adults living in the same accommodation as the overseas student are considered to be involved in the accommodation and welfare arrangements.

2. German School Johannes Gutenberg 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.
3. Before accommodation is approved, the Homestay Agency as well as the Registrar verifies the WWCC clearance for all adults involved in the accommodation via the NSW Office of the Children's Guardian website.
4. The outcome of the verification process is stored on the Student File in Compass by the Registrar.
5. WWCC expiration dates are monitored by the Registrar annually and at the start of student placement.
6. If an adult involved in or providing accommodation does not have a valid WWCC, German School Johannes Gutenberg and the selected Homestay Provider will not approve the accommodation.
7. If it is discovered that an adult involved in approved accommodation for an overseas student does not have a valid WWCC German School Johannes Gutenberg will no longer approve the accommodation and the Critical Incident Policy and Procedure for Overseas Students will be implemented.

### **German School Johannes Gutenberg approved welfare and accommodation: verification and monitoring**

1. The Homestay Provider 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; and
  - at least every 6 months thereafter.
2. The Homestay Provider will conduct an inspection of the accommodation by visiting and completing the accommodation checklist or Homestay Profile. This document is required to be sent to the Registrar and stored in the overseas student's file.
3. The Homestay Provider may request other documentation or use other methods as needed during the accommodation verification process.
4. The PEO will use documentation provided by the Homestay Provider including WWCC clearance verifications, accommodations checklist or Homestay Profiles to decide if accommodation is approved.
5. The PEO's decision is final.
6. If there is an approved change in accommodation, the Registrar 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.
7. The Registrar will provide the student with the new CAAW and will maintain a copy in the overseas student's file.
8. After each overseas student's accommodation has been approved, the Homestay Provider will monitor the accommodation generally every two weeks, but at least every 6 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
9. If a concern arises, other policies such as Child Protection Policy or Critical Incidents Policy and Procedure for Overseas Students will be implemented as appropriate.
10. The Registrar as well as the Homestay Provider is responsible for maintaining all records related to accommodation details, verification and approval, and ongoing monitoring in each overseas student's file.

### **German School Johannes Gutenberg approved welfare and accommodation: selecting, screening and monitoring by third parties**

1. The selection and approval of a third party to provide accommodation will be assessed by the PEO. The PEO's decision is final.
2. The PEO will maintain a written agreement/contract with any approved third party / Homestay Provider.
3. The Registrar will maintain all communication with any approved third party.
4. The Registrar will maintain a list of approved third parties in the Overseas Student Handbook and on the German international School Sydney website for Overseas Students.
5. The PEO will review the written agreements/contracts and the approved third-party list at least annually.
6. During the selection and screening process, third parties must provide requested documentation including but not limited to the below documents:
  - ASIC or ABN information;
  - marketing information and other material used by the third party such as Homestay Guidelines;
  - accommodation check lists or Homestay Profiles, including current information and updates about all residents in the accommodation/household; and
  - WWCC clearances for adults involved in providing accommodation. German School Johannes Gutenberg will conduct its own verification processes.
7. At any point, the PEO, Business Manager or Registrar may request the third party to provide updated or additional documentation.
8. The PEO may also request physical visits, including visits to an official place of business, meetings with representatives, or visits to typical accommodation facilities.
9. Homestay Providers and Host families are required to attend an information session at the commencement of studies at German international School Sydney. General Info sessions occur prior to the commencement of each Semester. Individual info sessions occur on the first day of school if the commencement date is outside the start of term 1 or 3. The Registrar contacts all relevant families and sends an invitation to attend, the agenda/ presentations, and records of attendance at the session.
10. Before an overseas student enters third party accommodation, the third party must provide the Registrar:
  - the accommodation verification "Homestay Profile" to demonstrate the accommodation is appropriate to the overseas student's age and needs; and

- current WWCC clearances for any adults involved in or providing accommodation and welfare arrangements to overseas students are included in the Homestay Profile.
11. The Registrar will ensure Working With Children Check clearances (WWCC) have been verified and recorded according to the Child Protection Policy.
  12. A copy of the CAAW letter identifying the verified accommodation will be stored in the overseas student's file by the Registrar.
  13. A third party accommodation provider must issue the Registrar with a 6-monthly report on the accommodation of each student.
  14. The Registrar or Student Counsellor also conduct monitoring by regular verbal confirmation with overseas students regarding their third-party accommodation.
  15. Records of selecting, screening and monitoring of third parties will be stored in the Homestay Provider Folder by the Registrar.

### **Concerns about or disruptions to approved accommodation and welfare arrangements**

1. If any required WWCC cannot be verified, the Registrar will immediately inform the Homestay Provider as well as the PEO. If German School Johannes Gutenberg is no longer able to approve welfare/accommodation arrangements, the PEO will make every effort to contact the overseas student's parents/legal guardians immediately.
2. Contact will be by phone, email, registered post and any other form of communication usually used with that family. The Registrar will maintain records of correspondence in the overseas student's file.
3. The PEO will contact the Department of Home Affairs (Immigration) within 24 hours in the form required by that department if German School Johannes Gutenberg is unable to approve the overseas student's welfare arrangements. All records of contact with Immigration will be stored in the student's file by the Registrar.
4. If German School Johannes Gutenberg 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;
  - The PEO has notified Immigration under National Code Standard 5.3.6 that German School Johannes Gutenberg 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.
5. The Registrar 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.
6. The Registrar will maintain all records of contact with Immigration which will be stored in the overseas student's file.

**Monitoring the living arrangements of overseas students living with a parent or DHA approved relative**

1. The PEO is responsible for monitoring the living arrangements of overseas students living with a parent or DHA approved relative.
2. Monitoring will take place at regular annual intervals and in the form of:
  9. a meeting at the school or at parent teacher evenings
  10. phone call
  11. email
  12. meeting with the overseas student
3. Records of monitoring accommodation and welfare is maintained in each overseas student's file and via Compass.
4. If a concern arises other policies such as Child Protection Policy and Critical Incident Policy and Procedure for Overseas Students will be implemented as relevant to the concern.

**Document Management**

Policy name	Younger Overseas Students Policy and Procedures
Version	1.1
School Leader responsible	Principal / PEO
Board portfolio	Governance and Strategy
Related documents	Child Protection Policy, Child Protection Procedure, Critical Incidents Policy Critical Incidents Policy and Procedure for Overseas Students, Complaints and appeals: Overseas Students – policy and Procedure Overseas Student Transfers Policy and Procedures Overseas Student Handbook
Version History	Version 1.0 – 15 July 2025 Version 4.0 of following two policies – 28 March 2025 3.11a GISS Younger Students in Homestay and 3.11b GISS Younger Students in Parent-nominated Homestay
Last Review / Update	Approved on 25 February 2026
Next review	Scheduled for February 2027
Approved by	Michael Cordes (Principal) and Tammie Christie (Board of Directors)

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