



EST. 1899

MENTONE GIRLS'  
GRAMMAR

## International Student Management Framework



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### **Help for non-English speakers.**

If you need help to understand this framework, please contact the Deputy Principal / Head of Senior School.

## **Statement of Acknowledgement**

*Mentone Girl's Grammar acknowledges the Bunurong People of the South-Eastern Kulin Nations for their connection to land, sea and community, and for their custodianship of the land on which we live, learn and work. We pay our respects to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander people today.*

## **Statement of Commitment**

It is the Mentone Girls Grammar (Mentone Girls' Grammar) policy to ensure continuous compliance with the Commonwealth, State and Territory legislation and regulatory requirements, and common law requirements relating to child welfare, protection and student duty of care requirements as it applies appropriate to the jurisdiction(s) in which it operates in. Mentone Girls' Grammar is committed to following the VRQA guidelines and to meet its legal and regulatory child safety obligations through the Mentone Girls' Grammar Child Safety Framework.

## **International Student Management Framework**

This International Student Management Framework sets out the parameters of the International Student Management end-to-end process based on the structure outlined in The National Code of Practice for Providers of Education and Training to International Students 2018.

### **Standard 1 - Marketing Information and Practices**

We adhere to National Standard 1 by ensuring the marketing of the school program is correct and not misleading. We ensure that all publicly available marketing documentation provided to prospective families and education agents includes the Schools CRICOS registration name and number.

### **Standard 2 - Recruitment of an International Student**

We are committed to recruiting responsibly through ensuring that students are appropriately qualified for the course. English language proficiency requirements, and a detailed curriculum overview are provided to the students prior to enrolment. Students are provided with:

- a provisional Offer Letter,
- an International Student Marketing Information Booklet to aid them in making informed decisions, and
- the International Student Course Credit process explaining how a student qualifies for course credit.



### **Standard 3 - Formalisation of enrolment and written agreements**

All International students have a written agreement in place. The written agreement protects the rights and sets out the responsibilities of each party, as well as the courses and related education services to be provided, tuition and non-tuition fees payable, and refund policies. Please refer to the following documents for more details:

- International Student Enrolment Agreement
- International Student Fee Schedule

### **Standard 4 - Education Agents**

Education Agents must act ethically, honestly and in the best interest of the students. Written agreement will be entered into with each Education Agent outlining their responsibilities and expectations. Please refer to the Student Advocate process for more information.

### **Standard 5 - Younger International Student**

We meet legislative or other regulatory requirements relating to child welfare and protection through the Child Safety Framework. We provide all International students under 18 with emergency contact information and information on how to report actual or alleged abuse.

All welfare arrangements for International students under the age of 18 remain the responsibility of the School and are outlined in the following processes:

- Younger International Student
- Homestay
- Student Advocate
- Homestay Agreement for students and homestay hosts
- Homestay Inspection Checklist

All arrangements must be suitable, ongoing and appropriately managed.

### **Standard 6 - International Student Support Services**

- We provide International students with a comprehensive orientation program (Presentation and Student Orientation Handbook) to adjust to study and life in Australia and help International students to access the information and services they need. The process for managing critical incidents is documented in the International Student Critical Incident Management process.

### **Standard 7 - International Student Transfers**

We adhere to Standard 7 by not enrolling an International student who wishes to transfer from one school to another, until they have completed six months at the first registered school. Please refer to the International Student Transfer section for more details.



### **Standard 8 - International Student visa requirements**

We ensure that we safeguard the integrity of Australia's migration laws by monitoring attendance, course progress, and course duration. We adhere to these conditions attached to international student visa. Please refer to the International Student Course Progress and Attendance process for more details.

### **Standard 9 - Deferring, suspending or canceling the International student's enrolment.**

We adhere to and keep student records within the Provider Registration and International Student Management System (PRISMS) database. Please refer to Deferring, Cancelling, or Suspending International Student Enrolment process for more details.

### **Standard 10 - Complaints and Appeals**

We ensure our International students have the right to natural justice protected through access to professional, prompt, inexpensive and documented complaints handling and appeals processes. Please refer to the International Student Complaints and Appeals process for more details.

### **Statement 11 - Additional registration requirements**

We strive to continue to meet the requirements for CRICOS registration and ensure the VRQA has up-to-date information on specific aspects of the school's operations and registered courses.

Institution Name: Mentone Girls Grammar School  
CRICOS Registration Number 00324B  
Course Code: 011309K  
Max capacity: 50



# Marketing Information and Practices

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard I

## Purpose

This section outlines the circumstances in which international students may enroll or transfer to or from Mentone Girls Grammar and apply for Course Credit.

## Policy

Mentone Girls' Grammar will ensure our marketing is conducted in a professional, correct and ethical manner ensuring the integrity and reputation of the international education industry in Australia.

Our CRICOS Provider code and full legal entity will be clearly displayed on all written and electronic material that is used for the purpose of marketing/corresponding with international students. Any tear away sections of forms/brochures/marketing material will include our full legal entity and CRICOS Provider Code.

Mentone Girls' Grammar will also include our full legal entity and CRICOS provider code on any Student Handbooks; Letters of Offer; Enrolment / Application forms or other documents used for the purpose of marketing.

Mentone Girls' Grammar policy is to include our full legal entity, CRICOS provider code, and trading name in the footer of all CRICOS related material including our website.

All the information provided by Mentone Girls' Grammar to students will be true and correct.

Mentone Girls' Grammar will inform students of the modes of study through which the course is offered as per the course marketing material. Any changes will be firstly advised in writing to students and signed as agreed to by students, prior to a change being made.

Any arrangements the School may enter in the future with another provider will include our full legal entity and CRICOS Provider code.

Marketing material must inform details of any:

- arrangements with 3rd parties to deliver any part of the course.
- English and Academic pre-requisites
- all relevant information relating to the course or outcomes of the course.

Mentone Girls' Grammar has a process for reviewing and approving changes to our marketing material. All marketing material and policies will have revision control.

Students wishing to transfer from another school, will be checked on PRISMS. PRISMS, in most cases, will provide a warning for students already enrolled in another school. Mentone Girls' Grammar enrolment application form has questions included to help establish the education history of students prior to enrolment.



Education Agents are monitored as per our 'Education Agents' Policy and Procedure and agreement with each individual agent.

The consent of students whose photos are used on the Mentone Girls' Grammar website or in marketing material will be sought prior to publication. Evidence of their consent will be retained for audit purposes. Any 'generic' pictures used for marketing should not be misleading to potential students.





# Enrolments and Course Credit

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 2
- Standard 7

## Purpose

This section outlines the circumstances in which International students may enroll or transfer to or from Mentone Girls Grammar and apply for Course Credit.

## Enrolment at Mentone Girls' Grammar School

- Enrolment is subject to meeting the minimum level of English language skills, and educational qualifications as outlined in the Enrolment Agreement.
- Mentone Girls' Grammar clearly outlines in plain English the course content and learning arrangements and assessment methods to all prospective students, via the Year Level Handbooks, provided at the time of enrolment.
- Tuition and non-tuition fees, as well as the cancellation and refund policies, are provided in the Enrolment Agreement fee schedule and available on the website.
- The reasons for student deferral, suspension or cancellation of the enrolment, are outlined in the Deferring, Cancelling, or Suspending enrolment section.
- The Homestay and the Student Advocate sections outline the process for approving the accommodation, support and general welfare arrangements for younger International students, (in accordance with Standard 5).
- The accommodation options and indicative costs of living in Australia are provided within the Enrolment Agreement and for other living expenses please review: <https://www.studyinaustralia.gov.au/English/Live-in-Australia/living-costs>.



## Enrolment Procedure

1. Students Parent completes an online application form and pays a non-refundable application fee of \$200.00 and provides the required evidence as requested on the form.
2. Mentone Girls' Grammar assesses the application form and evidence provided, approve or not approve enrolment, and keep evidence of the process followed (Enrolment Process Form) on the student file.
3. If application is accepted, school sends a Letter of Offer (either conditional or non-conditional), Acceptance of Offer/Written Agreement, invoice and pre-enrolment information
4. Student accepts the offer; returns the full signed and dated agreement contract and makes payment as set out in the agreement. Note Education agents cannot sign on behalf of a student.
5. School sends a CoE to the student/agent.

Letters of Offer must always

- Be very clear in distinguishing between 'Tuition and Non-Tuition fees'
- Any additional fees need to be listed clearly on the agreement and marketing material
- Ensure all items listed in the policy (a to u) are contained in the written agreement

## Fees

To comply with Sections 28 and 29 of the ESOS Act, Mentone Girls' Grammar ensures that tuition fees paid by overseas students are protected and managed in accordance with legislative requirements.

This involves receiving no more than 50% of the total tuition fees for a course before the student has commenced (unless the course is 24 weeks or less, or the student chooses to pay more). Additionally, the school may hold the pre-paid tuition fees in a separate account until the student begins their course.

## Recognition of Prior Learning and Course Credit

As part of the enrolment process, Mentone Girls' Grammar will grant Recognition of Prior Learning (RPCL) or course credit when:

- when a student has completed VCE units at another institution, and this has been verified by the VCAA.
- Mentone Girls' Grammar will not offer course credit for students in Years 7-10.

An application for RPL or course credit must be submitted by the student or their guardian, supported by relevant academic transcripts, certificates, curriculum outlines, and any other documentation that evidences prior learning. Academic staff familiar with curriculum standards, will evaluate the submitted materials to determine whether the prior learning is equivalent in content and outcomes to the school's course requirements. This may include review of learning outcomes, verifying provided documents, and in some cases, conducting interviews or additional assessments to confirm competency.

Once the assessment is complete, Mentone Girls' Grammar will formally record the outcome. If credit is granted, the school should update the student's academic record to reflect the specific units or subjects that have been credited. All decisions, including partial or non-granting of credit, will be documented in writing and communicated clearly to the student and guardians.

Acceptance of RPL or course credit is at the discretion of the school. Where the student chooses to enroll in a VET Certificate level program, the determination of whether RPL or credit will or will not be given will rest with the registered provider of the relevant course.



The process and outcome are transparent and appealable, ensuring fairness and consistency. Records will be securely maintained for quality assurance purposes in line with the school's record keeping practices.

## Formalisation of Enrolment and written agreements

### Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 3

### Purpose

Mentone Girls' Grammar will make a formal written offer (in plain English) to students after all the criteria as stated in NC *Standard 2 Recruitment of Overseas Student* have been met.

This agreement will be made before or at the same time as receipt of course payment. The receipt or details of the receipt (including date and amount) will be kept in the student file with the signed Formalisation of Enrolment document.

### Policy

Mentone Girls' Grammar's formal written agreement will include at the minimum:

- Course/s full name, and details CRICOS Course Code/s and any enrolment conditions
- Course location/s
- Course Modes of Study
- English and Academic Pre-requisite requirements, i.e. AEAS test score over 70
- An itemised list of Tuition and Non-Tuition fees payable (for each course), the periods to which the payments relate
- Details of any other fees that may be applicable during the enrolment period including reassessment fees, deferral fees, late payment fees)
- payment options
- Any other fees payable by the student to undertake the course.
- The agreement must be accepted by the student/ *at the same time as, or before*, Mentone Girls' Grammar can accept course money from the student.
- The services to be provided
- The full refund policy and the process for claiming a refund, including details of amounts of money that may or may not be refunded to a student.
- full Complaints and Appeals Policy and Procedure
- Students **MUST** inform the school of any change to residential address, phone, email, emergency contact details / next of kin while enrolled in a course within 7 days of the change, this is also a visa condition 8533 / legislative condition. Mentone Girls' Grammar will remind students of a minimum of 6 months of this requirement and keep evidence of the same for audit.
- As per the ESOS Act, Students must also advise of any change to their address, email or phone details.
- The following notice to students in a prominent position stating.
- 'Information is collected on this form and during your enrolment to meet our obligations under the ESOS Framework including the ESOS Act 2000 as amended and the National Code 2018; to ensure student compliance with the conditions of your visa and your obligations under Australian immigration laws generally. The authority to collect this information is contained in the Education Services for Overseas Students Act 2000, the Education Services for Overseas Students



Regulations 2001 and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 as amended. Information collected about you on this form and during your enrolment can be provided, in certain circumstances, to the Australian Government and designated authorities and, if relevant, the Tuition Protection Service Administrator. In other instances, information collected on this form or during your enrolment can be disclosed without your consent where authorised or required by law'. The information provided will be per the Privacy Act of 1988.

- A statement 'This written agreement, and the right to make of complaints and seek appeals of decisions and action under various processes, does not affect the rights of the student to act under the Australian Consumer Law if the Australian Consumer Law applies.
- I am aware of my obligation to pay outstanding course fees and school will pursue outstanding fees under Australian Law.
- A statement that the student is responsible for keeping a copy of their written agreement and receipts for all payments made, both tuition and non-tuition.
- Mentone Girls' Grammar will only provide hyperlinks to supplementary material.

Education Agents are not permitted to sign written agreements on behalf of students



# Education Agents

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 4

## Purpose

Mentone Girls' Grammar will take all reasonable measures to ensure that Education Agents have proper knowledge and understanding of the Australian International Education Industry.

Mentone Girls' Grammar will not use Education Agents who are dishonest or lack integrity.

Education Agents are not authorised to accept payment on the school's behalf.

An agent that is found to be negligent, careless or incompetent or has engaged in false, misleading or unethical advertising and recruitment practices, will be dealt with immediately and may lead to the termination of the agent's agreement with Mentone Girls' Grammar.

Agents as a third-party provider to Mentone Girls' Grammar **MUST** cooperate with VRQA and any other delegated Regulator and provide prompt correct responses to requests about delivery of services under their agreement.

Mentone Girls' Grammar will enter into written agreements with each agent that is engaged to formally represent them.

## Policy

Mentone Girls' Grammar will require its education agent to:

- declare in writing that they will take reasonable steps to avoid conflicts of interest within their duties as an education agent.
- observe appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students.
- act honestly and in good faith, and in the best interests of the student.
- have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.

Where Mentone Girls' Grammar becomes aware that, or has reason to believe, that the education agent or an employee or subcontractor of that education agent has not complied with the education agent's responsibilities under NC Standards 4.2 and 4.3, Mentone Girls' Grammar will take immediate corrective action.

Where Mentone Girls' Grammar becomes aware, or has reason to believe, that the education agent or an employee or subcontractor of the education agent is engaging in false or misleading recruitment practices, Mentone Girls' Grammar will immediately terminate its relationship with the education agent, or require the education agent to terminate its relationship with the employee or subcontractor who engaged in those practices.



Mentone Girls' Grammar will not accept students from an education agent if it knows or reasonably suspects the education agent to be:

- giving migration advice, unless that education agent is authorised to do so under the Migration Act
- engaged in, or to have previously engaged in, dishonest recruitment practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Overseas student transfers)
- facilitating the enrolment of a student who the education agent believes will not follow the conditions of his or her visa using PRISMS to create CoEs for other than bona fide students.

Mentone Girls' Grammar will keep records and details of any agents that have been ended, including reasons and actions taken.

If an agent approaches Mentone Girls' Grammar on behalf of a student, no agreement is needed, as the agent has not been authorised to promote the school or our courses on an ongoing basis. In this case Mentone Girls' Grammar will write on the Letter of Offer that the agent IS NOT acting on behalf of the school.

All current agent details (agents who Mentone Girls' Grammar has an agreement with) will be published on the school's website and updated regularly.

Education Agents will not have access to PRISMS on Mentone Girls' Grammar behalf.

Mentone Girls' Grammar will not accept students or enter into an agreement with an education agent if it knows or suspects the agent to be:

- engaged in any dishonest practices or it is known that they have previously engaged in dishonest practices.
- recruiting or enrolling anyone other than genuine/bona fide students
- providing immigration advice where they are not authorised to do so under the Migration Act 1958.

# Student Advocates

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 5

## Purpose

This section outlines the screening, approval, and monitoring of Student Advocates provided for international students. This policy does not apply where a parent or suitable nominated relative takes responsibility for the welfare arrangements of the student for the duration of their enrolment.

## Policy

International Students enrolled at Mentone Girls' Grammar may live with one of the following:

- A parent on a Guardian visa (subclass 590).
- A Department of Home Affairs approved relative.
- A School approved homestay family.

Students who live in homestay must have a Student Advocate in Melbourne for the duration of their enrolment. Families may nominate a known family member or friend to this role or request that Mentone Girls' Grammar appoint a professional service provider on behalf of the student, with fees payable by the family. The duration of this arrangement will be in line with the dates of the Confirmation of Appropriate Accommodation and Welfare (CAAW) letter.

The role of the Student Advocate is that of an independent third party to advocate in the best interests of the student. The Student Advocate is not a legal guardian of the student. The expectations of the Student Advocate are outlined, but are not limited to the following:

- Contacting parents and students prior to their arrival, confirming arrangements.
- Visiting the student at their accommodation after arrival in Australia.
- Explaining visa regulations, important safety, and security information direct to the student.
- Help the student to open a bank account and buy a local telephone SIM card (if needed).
- Helping the student buy a local transport card and explaining how to use local public transport (train, bus, tram, taxi).
- Explaining to the student how their international health insurance (OSHC) works and advising on how to obtain or register their health insurance card.
- Engaging with homestay hosts helping explain homestay rules to students.
- Reporting to parents on the progress of the students and providing regular feedback.
- Monitoring student welfare through phone calls/online live chats to the student regularly.
- Having regular personal meetings with the student, visiting the student a minimum of every 14 days, and discussing student progress with academic staff.
- Attending parent-teacher interviews and reporting results to parents.
- Translating academic reports and sending a copy to the parents.
- Confirming students' holiday plans, helping with booking air tickets if needed and reporting to the school about holiday arrangements.
- Helping students to arrange medical appointments.
- Helping students to apply for a change of approved accommodation if needed – please note final approval for any change of accommodation is given by the school.
- Providing 24 hour – 7 days a week emergency assistance.



## Recruiting and Screening of Student Advocates

Mentone Girls' Grammar approves the nominated Student Advocate.

The Director of Enrolments or International Student Coordinator will do the following:

- Meet the proposed student advocate to determine their character and background.
- Obtain proof of the identity of the Student Advocate, i.e., passport.
- Obtain and review information about any essential or relevant professional or other qualifications that the Student Advocate has.
- Obtain and review the Student Advocate's history of work involving children.
- Obtain reference contact details of personal and professional referees of the Student Advocate.
- Check references for suitability, including asking referees at least one suitability question relating to the Child Safe Standards

All records about the recruitment and screening of student advocates will be stored in the school's database – Synergetic.

Where the School uses a third party to source student advocates, the process prescribed under this Policy will still be followed by the school to assess the Student Advocate, regardless of the third party's process or recommendation. The use of a third party is purely to connect the school with potential advocates and does not represent any effort to delegate the school's responsibility. All third-party providers need to provide Child Safe documentation and WWCCs. These records are recorded and kept up to date.

## Approval and ongoing monitoring of Student Advocates

All approved Student Advocates must:

- Provide a copy of a valid Working with Children Check.
- Comply with ISA's and Mentone Girls' Grammar's Child Safety and Wellbeing Policy, Child Safety Code of Conduct and Child Safety Reporting Procedures.
- Attend any orientation sessions, training sessions, and complete any online training provided by Mentone Girls' Grammar from time to time.

The school checks all Student Advocates for ongoing quality of service, ethical standards, adherence to the child safe standards and suitability to meet the age and needs of their assigned international student by:

- Conducting regular student feedback reviews.
- Ensuring that WWCC for the Student Advocate stays valid and current.
- Confirming they have a clear understanding of the policies and procedures in relation to child safety and wellbeing.

Mentone Girls' Grammar will issue an Electronic Confirmation of Enrolment (eCoE) to the agent upon confirmation of:

- Approved Student Advocate arrangements; and
- Approved homestay arrangements (see Homestay section); and
- Confirmation of ELICOS enrolment (if needed),





# Younger International Students

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 5

## Purpose

This section outlines the process of meeting legal and regulatory obligations in circumstances where the school enrolls an international student who is under 18 years of age.

## Age and Culturally Appropriate Information

All International Students are given age and culturally appropriate information through the following communication channels:

- The International Student Handbook.
- Orientation session.
- International student safety card.
- Regular face-to-face meetings with the International Student Coordinator.

International students are provided with emergency contact details and information about how to seek help and report any incident or allegation involving any form of actual or alleged abuse, as defined in the Child Safety Framework.

### International Student Safety Card

All international students enrolled at Mentone Girls' Grammar are issued with a Student Safety Card by the International Student Coordinator. This card is issued at the time of commencement and for the full duration of their enrolment. The student must always carry this card with them in order that they are able to contact designated responsible persons in case of an emergency.

The students, homestay host and all relevant Mentone Girls' Grammar staff are briefed on the purpose of the card and the information contained within the card, so that all parties understand what to do in case of an emergency.

Mentone Girls' Grammar should always be contacted first in case of an emergency (call on 000 if there is an urgency or immediate need for police attendance).

If any information on the card changes, the students will be provided with a new card immediately.



The Student Safety Card includes:

- The 24-hour contact number of the International Student Coordinator.
- The Principals emergency contact number.
- The student's homestay telephone number.
- The Student Advocate's number.
- Details of emergency agencies in Victoria.

### Working With Children Check (WWCC)

The School mandates that all adults, including Student Advocates, Homestay Hosts, and any other individuals aged 18 years or older residing at the homestay, who are involved in providing accommodation or welfare arrangements for international students, must hold a current Working with Children Check. A copy of this check will be recorded in the school's Synergetic database.

This requirement applies regardless of whether an individual is legally obligated under Working with Children Check legislation to obtain the check.

### Welfare Arrangements Approved by the Department of Home Affairs

If an International student enrolled at the School is under the age of 18, a parent/guardian, or eligible relative can be nominated to take responsibility for the International student's accommodation and welfare arrangements. The parent/guardian, or eligible relative must have a suitable visa: Student Guardian visa (subclass 590).

An eligible relative can be:

- a parent, spouse, de facto partner, brother, sister, stepparent, stepbrother, stepsister, grandparent, aunt, uncle, niece or nephew, or step-grandparent, step-aunt, step-uncle, step-niece or step-nephew; and
- nominated by the parent of the applicant or a person who has custody of the applicant, and must be:
  - aged at least 21; and
  - of good character, and shows this by providing Police clearance from the countries in which they have lived for more than 12 months in the past 10 years after the age of 16; and
  - an Australian citizen, permanent resident or is eligible to still be in Australia until the International student's visa expires or the International student turns 18 years of age (whichever happens first).

Mentone Girls' Grammar does not issue a Confirmation of Appropriate Accommodation and Welfare letter (CAAW) letter in this instance and is not obliged to follow up where a nominated guardian has been approved by the Department of Home Affairs.

Mentone Girls' Grammar understands its obligation to contact the Department of Home Affairs and the VRQA if they become aware that the International student is not being appropriately cared for.

### Welfare Arrangements Accepted by the School

Where Mentone Girls' Grammar accepts responsibility for the welfare arrangements of an International student under the age of 18, a Confirmation of Appropriate Accommodation and Welfare letter (CAAW) is created at the same time as a Confirmation of Enrolment (CoE). By signing the CAAW, Mentone Girls' Grammar confirms arrangements are in place for the student's welfare. The Department of Home Affairs is not involved in this process.



Mentone Girls' Grammar nominates the start and end dates of the period they are willing to accept responsibility for approving accommodation, support and welfare arrangements for an International student under the age of 18. These nominated dates must cover the length of the CoE plus seven days at the end, at a minimum.

If a student wishes to arrive in Australia outside of the approved CAAW dates, the student will have to have a nominated guardian approved by the Department of Home Affairs, or the School will have to extend its approved care arrangements. It is preferable that the student does not travel to Australia until the CAAW commences. Refer to the Homestay section for further details.

### Transferring Between Registered Providers

Where an International student transfers to another school, the receiving school must ensure there is no gap in welfare arrangements and must issue a CAAW letter covering the transition from one accommodation arrangement to another. Mentone Girls' Grammar will inform the student and their parents or legal guardian of their visa obligations to keep their current welfare arrangements and wait for approval of the new welfare arrangements or return to their home country until the new approved welfare arrangements take effect.

### Accommodation, Support and General Welfare Arrangements

Under Standard 5.3, where the School takes on responsibility under the Migration Regulations for approving the accommodation, support and general welfare arrangements for a student who is under 18 years of age, the School:

- implements documented processes for verifying that the student's accommodation is appropriate to the student's age and needs, by the Homestay section.
- includes a process for managing emergency situations and when welfare arrangements are disrupted.
- maintains up-to-date records of the student's contact details outlined in Standard 3.5, including the contact details of the parent(s), guardian(s) or any adult responsible for the student's welfare.
- Advise the parent or legal guardian at once if the school is no longer able to approve welfare arrangements.
- advises the Department of Home Affairs, in the form required by the department:
  - as soon as possible, if the student will be cared for by a parent or nominated relative approved by the Department of Home Affairs and a Confirmation of Appropriate Accommodation and Welfare (CAAW) is no longer needed.
  - within 24 hours if the School is no longer able to approve the student's welfare arrangements.

If an International student's parent, legal custodian, or eligible relative wishes to care for them in Australia, they should apply to be the International student's nominated guardian through the Department of Home Affairs.

Mentone Girls' Grammar may use an accommodation agent or registered homestay service to help in arranging accommodation for International students, but it acknowledges the responsibility to meet the requirements of the National Code.

Mentone Girls' Grammar acknowledges that CAAW responsibility cannot be delegated to any other party. The school retains the ultimate responsibility for approving and assuring welfare arrangements for the International student:

- completes her enrolment; or
- is outside Australia; or
- turns 18; or
- transfers to another provider's CAAW; or



- enters the care of a nominated guardian approved by the Department of Home Affairs.

## Monitoring Welfare arrangements

Mentone Girls' Grammar monitors the welfare arrangements of International students to ensure their accommodation is suitable for their age and needs. This is achieved through various processes, including:

- Physical site visits prior to accommodation approval and at least once every six months thereafter.
- Student interviews.
- Student surveys.
- Other methods to confirm that the accommodation consistently meets the needs of the International student.

The International Student Coordinator is responsible for overseeing welfare arrangements, and records of visits and interactions are maintained in Synergetic within the student's record.

## Missing Students

International students are informed during their Orientation and through the Written Agreement that they are required to notify both the Homestay Provider and the School of their whereabouts, including any holidays, excursions, or activities outside of school hours. It is the student's responsibility to ensure the Homestay Provider is aware of their location.

If Mentone Girls' Grammar is unable to contact a student and has concerns regarding the student's welfare, the School will make all reasonable efforts to locate the student. Prior to declaring an International student as missing, the School will attempt to contact the student and, if the student is residing in homestay accommodation, the host family.

- The School will attempt to reach the Student using all available contact numbers, as well as any known contacts for the Student's friends, if the School has these details.
- The School will also reach out to the Student's Advocate for assistance in locating the Student.

International students will be regarded as 'missing' when the School cannot contact or find the student and:

- the absence of the student is inadequately explained.
- there are suspicious circumstances surrounding a student's disappearance.
- there are fears or concerns about the safety and welfare of the student.
- if the International student is living in homestay accommodation, the host family cannot find the student.

School staff must escalate any critical incident to the Principal (or their delegate) immediately. If the School is unable to locate or contact the student, or if there are concerns regarding the student's welfare and safety, the Critical Incident Team will be notified. The Principal will then inform the Police and any other relevant Commonwealth, state, or territory agencies as soon as practicable.

Once the Police have been informed, the School will inform the International student's parents/guardians, the Department of Education and the VRQA as soon as practical.



## Welfare arrangements after Suspension or Cancellation

Mentone Girls' Grammar continues to approve the welfare arrangements for a student that has suspended or cancelled their enrolment until such time as:

- the student has alternative welfare arrangements in place approved by another school.
- care of the student by a parent or nominated relative is approved by the Department of Home Affairs.
- the student leaves Australia.
- the School has notified the Department of Home Affairs under Standard 5.3.6 that it is no longer able to approve the students' welfare arrangements, or under Standard 5.5 that it has taken the required action after not being able to contact the student.

Before ending the CAAW for the student, the School must ensure the student has new welfare arrangements formally in place. The student must provide a letter from another registered provider, or their parents/ guardians/eligible relatives confirming that they will take the responsibilities for the international student's welfare arrangements and the date from which the new arrangements will begin.

Where an International student's parent/guardian or eligible relative is planning to look after the international student for a brief period, such as a holiday, the School may decide to continue their CAAW arrangements, rather than terminate the CAAW.

The School may decide to end a CAAW where it can no longer take responsibility for the international student due to events, such as:

- the international student refuses their accommodation or leaves their accommodation without notice.
- after the School has exhausted all possible avenues of assisting the international student to maintain appropriate arrangements.
- the accommodation provider becomes unable to keep arrangements.
- the international student's enrolment is suspended or canceled.
- the international students go missing from their accommodation and cannot be found or contacted, even after the School has implemented our International Students Critical Incident Response.

In the situations listed above, the School will notify the students' parents or legal guardian at once and report to the international student within 24 hours using the 'Non-Approval of Appropriate Accommodation/Welfare Arrangements' letter in PRISMS. This may lead to cancellation of the International student's visa by the Department of Home Affairs for breaching visa condition 8532.

## After an International student turns 18

It is a condition of enrolment that any student over the age of 18 will reside in a Homestay or School approved appropriate accommodation until the completion of their course.

If an International student turns 18 while enrolled at the School, the School's formal CAAW responsibility will cease, and the requirements under Standard 5 of the National Code, as well as this policy, will no longer apply to the student. However, Mentone Girls' Grammar will continue to ensure that appropriate welfare arrangements are maintained for the student throughout the duration of their enrolment.

# Homestay

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 5

VRQA guidelines state that students under the age of 13 may not live in a homestay arrangement. Mentone Girls' Grammar chooses that students live with a Department of Home Affairs (DHA) approved parent or guardian until such time as a student reaches Year 9, at which time, if needed, the student may live in a homestay arrangement.

## Purpose

This policy outlines the screening, approval, and monitoring of homestay providers for international students. This policy does not apply where a parent or suitable nominated relative takes responsibility for the welfare arrangements of the student for the duration of their enrolment.

## Students Residing in a Homestay Arrangement

Unless the student is living with a parent or a relative approved by DHA and approved by the School, it is expected that all International Students will live in homestay arrangements. All homestay arrangements must meet the minimum requirements decided by the School and the VRQA guidelines.

- Where Mentone Girls' Grammar accepts responsibility for the welfare arrangements of an International student under the age of 18, a Confirmation of Appropriate Accommodation and Welfare letter (CAAW) is created at the same time as a Confirmation of Enrolment (CoE).
- By signing the CAAW, Mentone Girls' Grammar have approved and confirmed proper arrangements are in place for the student's welfare.
- Mentone Girls' Grammar will select the homestay for the International student and changes may only be made through consultation with the International Student Coordinator. Any changes to the homestay will be arranged by the School. Students may not make homestay arrangements independently.
- Mentone Girls' Grammar will not approve a homestay arrangement where the student will live with a registered teacher or an employee of the School.

## Recruiting and Screening Homestay Hosts

Mentone Girls' Grammar assesses whether a homestay host and the home accommodation are right. The International Student Coordinator will:

- Meet the proposed host, and any others who live at the homestay accommodation to determine the character and background of all persons who will be in frequent contact with the homestay student.
- Visit the home and complete the Homestay Checklist.
- Ensure the Homestay family completes annual Child Safety training including reading and acknowledging the School's:
  - Child Safety Policy
  - Child Safety Code of Conduct
  - Child Safe Response and Reporting Procedure
  - Any other relevant policies.

- Obtain valid WWC checks from all persons 18 years or over (including other students) living or frequenting the home and check the validity of the documents via the WWC check website.
- Obtain information about any essential or relevant professional or other qualifications that the homestay host has.
- Obtain the homestay host's history of work involving children.
- Obtain reference contact details of personal and professional referees of any persons over 18 years who live or frequent the home as required.
- Check references for suitability, including asking referees at least one suitability question relating to the Child Safe Standards

### Hosts family requirements

The School requires each host family to agree to several requirements prior to hosting an International Student. Host families must:

- Provide a safe and welcoming homestay family environment that is conducive to the student's emotional, social, physical, and educational wellbeing.
- Encourage students to experience life as a member of the family and help students in adapting to the new culture and life. Where suitable, include students in family-related activities and events.
- Ensure family members show interest in the student's culture and customs and are respectful of these.
- Provide an orientation within the family home, the use of facilities and security. This should include household protocols, safety around the house including use of appliances, handling pets, and the use of shared areas or facilities such as swimming pools, internet and telephone; rules regarding visitors and appropriate times to return home during the week and on weekends.
- Provide all meals – breakfast and lunch may be self-service, and dinner should be a meal with the family. There should be a nutritional variety of food with some choice to accommodate cultural differences. Students should be advised of mealtimes.
- Provide students with an orientation to the local area including public transport and getting to and from school; the location of shops, doctors or medical facilities; and recreation areas.
- Ensure the student is aware of emergency numbers including 000, location of police stations and Australian laws pertaining to under 18-year-olds.
- Ensure that students are appropriately always supervised throughout the duration of living in the homestay including:
  - Maintaining reasonable supervision of students outside of school hours.
  - Monitoring the students' general welfare including the students' social activities.
- Contact the School and Students Advocate about any student welfare, academic progress and attendance issues; this includes notifying the school if the student is absent.
- Notify the International Student Coordinator as soon as possible of any change of circumstances in the household including:
  - If the homestay provider proposes to materially change the homestay residence in such a way that will affect their ability to meet the homestay residence standards listed above.
  - If the homestay provider is temporarily unable to provide accommodation or suitable supervision for holidays or other periods.
  - If the homestay provider intends to change address or contact details.
  - If the student intends to move.
- Meet with the International Student Coordinator, as requested by the school.
- Help the student to access any medical, dental, hospital or other health-related services,





including making appointments.

## Approval and ongoing monitoring of Homestay Hosts

The International Student Coordinator will match the homestay accommodation to the individual needs of the International Student and their family, considering factors such as age, interests and study requirements.

The accommodation requirements for students are assessed as follows:

- Physical site visits.
- Student interviews.
- Interviews with prospective homestay families.

For the accommodation requirements to be approved by Mentone Girls' Grammar, the homestay must:

- Have a safe, secure, separate bedroom that is appropriate to the age and needs of the student with suitable storage space for clothes, personal effects and study materials, and suitable facilities including a desk, a chair and adequate lighting for study purposes.
- Be clean and have appropriate furnishings suitable for a family and students.
- Include access to a shared or private lockable bathroom, with reasonable time allowed for showers.
- Include access to kitchen, living areas, laundry facilities and shared areas of the home.
- Have some form of heating in winter, if needed, and some means of cooling in summer.
- Provide students with any keys, alarms or passwords needed to have free access to the homestay residence.

Additionally, Mentone Girls' Grammar will continue to check:

- That all adults living at any homestay premises have current Working with Children Check Clearances and have accepted the school's Child Safety Framework.
- Provide the homestay family with appropriate information about their responsibilities and 24-hour emergency contact details for both the School and the parents of the student.
- Outline emergency protocols including the requirement to advise Mentone Girls' Grammar in the first instance.
- Conduct a first site inspection and perform six-monthly reviews to verify that the accommodation remains appropriate to the student's age and needs.
- Conduct assessments of the homestay with access to all areas of the homestay premises for the purpose of checking compliance with the homestay standards required by the School.
- Maintain regular contact with host families, students and School staff as needed.

Inspections of Homestays are conducted in accordance with the Homestay Checklist.

## Emergency situations

In case of an emergency requiring a student's urgent relocation the Principal may approve a temporary placement with a School employee who is not a registered teacher. This will be an interim arrangement until ongoing homestay accommodation is in place. Associated costs will be borne by the School. The student's parents will be immediately notified of any change to Homestay arrangements.

## Transferring between registered providers

If an International student transfers to another school, it is the responsibility of the receiving school to ensure there is no gap in welfare arrangements and must issue the corresponding CAAW letter. Mentone Girls' Grammar will inform the student of their visa obligations to keep their current





welfare arrangements and wait for approval of the new welfare arrangements or return to their home country until the new approved welfare arrangements take effect. Refer to International Student Transfer process.

### International Student Safety Card

All international students enrolled at Mentone Girls' Grammar are issued with a Student Safety Card by the International Student Coordinator. This card is issued at the time of commencement and for the full duration of their enrolment. The student must always carry this card with them in order that they are able to contact designated responsible persons in case of an emergency.

The student, homestay host and all relevant Mentone Girls' Grammar staff are briefed on the purpose of the card and the information contained within the card, so that all parties understand what to do in case of an emergency.

Mentone Girls' Grammar should always be contacted first in case of an emergency (call on 000 if there is an urgency or immediate need for police attendance).

If any information on the card changes, the students will be provided with a new card immediately.

The Student Safety Card includes:

- The 24-hour contact number of the International Student Coordinator.
- The student's homestay telephone number.
- The Student Advocate's number.
- Details of emergency agencies in Victoria.

### Working With Children Check (WWCC)

It is the School's policy that all adults, including Advocates and Homestay Hosts, who provide international student accommodation or welfare arrangements, must hold a current Working with Children Check per the School's Child Safety Framework

# International Student Critical Incident Management

## Source of Obligation

Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 5
- Standard 6

## Purpose

This policy outlines the requirements when an International student may be involved in a critical incident.

Mentone Girls' Grammar has developed an Emergency Management Plan in consultation with Statcom Systems which documents a number of emergency and critical incident management procedures faced by all staff, visitors and students.

Mentone Girls' Grammar is committed to providing information to all International students on how to seek help and support in relation to a critical incident or any incident that affects their wellbeing. International Students take part in a thorough Orientation Program and are provided with an International Student Handbook.

## Definition

The National Code defines a critical incident as 'a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury'. This does not include serious academic misconduct.

In relation to International students, critical incidents may also include emergency situations that occur in a student's home country or relate to their family in or outside Australia.

Critical incidents are not limited to, but may include:

- Missing students.
- Death, severe injury, or any threat of these.
- Natural disaster.
- Issues such as domestic violence, physical, sexual or other abuse.
- Severe verbal or psychological aggression.
- Other non-life-threatening events.

## International Students under 18

The School meets its legal and regulatory child safety obligations through the policies and procedures in its Child Safety Framework.

Mentone Girls' Grammar ensures that any person involved in caring or providing accommodation to International students under 18 has a current working with children check (WWC). All staff, including non-teaching staff and volunteers, who are in possible contact with under-18-year-old students, must also hold a current WWC check.

Where an international student under the age of 18 has their accommodation or welfare arrangements disrupted, the School will take all reasonable steps to ensure the student's parents or legal guardians are notified immediately. Mentone Girls' Grammar retains responsibility for the welfare of an International student on a CAAW letter, until such time as is stipulated in the

nominated dates set under Migration Regulations and the student's enrolment.

If Mentone Girls' Grammar is unable to contact a student and has concerns for the student's welfare, the School will make all reasonable efforts to find the student, including notifying the police and any other relevant Commonwealth, state or territory agencies as soon as practicable.


## Critical Incidents Response

In case of a critical incident involving an International student, the following procedures will apply.

### 1. Immediate Response to a Critical Incident

If any person becomes aware of an International student involved in a critical incident (excluding a major natural disaster), the following steps must be taken to support the safety and wellbeing of the student:

- Provide First Aid where appropriate.
- Contact the emergency services – Police, Fire, Ambulance, or other local emergency services needed to reduce the immediate threat.

Agency	All Hours	
Police	000	
Fire Brigade	000	
Ambulance	000	
State Emergency Service	132 500	

- Contact the International Student Coordinator, who will then notify the Head of Senior School who will then notify the Principal.

### 2. Action by Head of Senior School

The Head of Senior School will assess the Critical Incident and develop the response accordingly, including:

- Notify the International Students Parents, or DHA approved relative (with the help of an interpreter, if needed) and the Homestay host and Student Advocate, where appropriate
- Coordinate any immediate information and support needed.

### 3. Implementation of Response Plan

The School would assemble a Critical Incident Management team made up of members of the Emergency Planning Committee and specialists as required, to manage the short- and long-term effects. The team may include staff members, psychologists, counsellors, external personnel, support agencies and external professionals. The size and composition of the team will be related to the nature of the incident.

The Principal or Critical Incident Team may undertake the following actions, but not limited to these:

- Obtain exact information and support the student by offering appropriate services the student may need; medical, psychological, translation services, etc.
- As soon as possible inform relevant staff, e.g., Head of Year, Tutor.
- Ensure that counselling help is available for all staff and students.
- Where appropriate, and in line with the School's Privacy Policy - continue to keep staff, students and parents informed, especially about what has happened and what the school is doing about the incident and its management.



#### 4. Recording and Documentation of Critical Incident

The Head of Senior School will record the Critical Incident, including details of the remedial actions taken using the Incident Form. The Incident Form is accessible through mConnect: Report an Incident/Hazard.

Decide if the Critical Incident requires further reporting to external agencies. In the case of International students, the Enrolment Manager manages the correct update of the students record in PRISMS.

#### 5. Final Review

Mentone Girls' Grammar will review and evaluate the effectiveness and appropriateness of the Critical Incident Teams response to and management of the Critical Incident to identify any required refinements that could be made to the procedure for future responses to critical incidents.

#### Communication to the Media

Where the circumstances of a critical incident involving an International student is considered to have any public relations implication, the Principal is the only authorised person to speak to any media representatives.

# International Student Transfer

## Source of Obligation

National Code of Practice for Providers of Education and Training to International. Students 2018 (the National Code 2018).

- Standard 5
- Standard 7

## Purpose

This policy outlines the circumstances in which International students may transfer to or from Mentone Girls' Grammar.

## Reviewing the Transfer Request

Any request for transfer to another registered provider must:

- Be in writing.
- Show a valid enrolment offer from another registered provider.
- Be accompanied by written confirmation from the parent/guardian that they support the transfer.

Mentone Girls' Grammar will take no more than 14 days to review any training request after the International student has completed the first six months of the first registered school course unless an exception in Standard 7.1 applies. These exceptions being:

- The releasing registered provider, or course on which the International student is enrolled, has ceased to be registered.
- The releasing registered provider has had a sanction imposed on its registration by the ESOS agency that prevents the International student from continuing the course at that registered provider.
- The releasing registered provider has agreed to the International student's release and recorded the date of effect and reason for release in PRISMS.
- Any government sponsor of the International student considers the change to be in the International student's best interests and has provided written support for the change.

Mentone Girls' Grammar may release a student for transfer where the student has completed six months, and in addition, transfers may be granted when it is in the student's best interest as follows:

- The International student is unable to achieve satisfactory course progress at the level they are studying, even after engaging with the School's intervention strategy, and will therefore have to be reported.
- The School is unable to deliver the course as outlined in the written agreement.
- There is evidence that the International student's reasonable expectations about their current course are not being met.
- There is evidence that the International student was misled by the School or an education or migration agent about the School or its course and the course is therefore unsuitable for their needs and/or study goals.
- An appeal (internal or external) on another matter results in a decision or recommendation to release the International student.
- There is evidence of compassionate or compelling circumstances as follows:
  - serious illness or injury, where a medical certificate says that the International



student was unable to attend classes.

- bereavement of close family members such as parents or grandparents.
- major political upheaval or natural disaster in the home country requiring emergency travel and this have affected on the International student's studies.
- a traumatic experience, which could include:
  - witnessing or being involved in a serious accident.
  - witnessing or being involved in a serious crime (police or psychologist reports may be requested).

Mentone Girls' Grammar may require the student to provide documentary evidence to support any claim of compassionate or compelling circumstances.

### Granting Release

In accordance with Standard 7.4, if a release is granted by the School, it will be at no cost to the International student and the School will advise the student to contact the Department of Home Affairs to seek advice on whether a new student visa is required. Fees in lieu of adequate notice, however, may apply. Per Standard 7.6 the School will only finalise the International student's transfer refusal status in PRISMS when:

- Any appeal finds in favour of the School.
- The International student has chosen not to access the complaints and appeals process within the 20-working day period.
- The International student withdraws from the process.

### Transfer of an International student under 18

Mentone Girls' Grammar ensures that where a student is under 18 years of age:

- The School has written confirmation that the International student's parent/guardian supports the transfer.
- The receiving provider has accepted responsibility for approving the student's accommodation, support, and general welfare arrangements per Standard 5 (Younger International Students).

Per Standard 5, It is the responsibility of the receiving provider to ensure that there are no gaps in the International student's welfare arrangements. Mentone Girls' Grammar has in place the process of:

- liaising with the first registered provider,
- always confirming students' welfare arrangement, and
- issuing Confirmation of Appropriate Accommodation and Welfare letter covering the transition from one accommodation arrangement to another.

### Refusal to Grant a Transfer

Mentone Girls' Grammar may refuse a transfer request where it believes it is reasonable to do so. Reasonable grounds include:

- The International student intends to fail to be released and does not take part in the intervention strategy.
- If any of the course fees are still unpaid at the time of the request.
- If a student has commenced VCE (units 1 to 4) transfer of enrolment may be detrimental to continuous delivery of the program.
- If the course the student intends to do does not meet the study capabilities of the student or



provide adequate access to support services.

If Mentone Girls' Grammar intends to refuse a request for transfer, the School will inform the International student in writing as follows:

- the reasons for refusal; and
- the International student's right to access the School complaints and appeals process, outlined in the International Students Complaints and Appeals process, within 20 working days of the decision being made.

# Course Progress and Attendance

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 8

## Purpose

This policy outlines the monitoring of International student's visa requirements.

Mentone Girls' Grammar monitors International student progress, attendance, and course duration. Mentone Girls' Grammar is committed to monitoring each individual International student's progress to ensure they will finish the course within the expected duration specified on the International student's Confirmation of Enrolment. Mentone Girls' Grammar will identify, notify, and help an International student at risk of not meeting course progress or attendance requirements.

At the enrolment stage the International students are informed of the requirements to achieve satisfactory course progress and satisfactory attendance at school.

## Attendance

Satisfactory attendance at Mentone Girls' Grammar is 80% of class contact hours.

Mentone Girls' Grammar keeps a register of the daily attendance of all students at the School in electronic form through Synergetic. Records of student attendance are retained permanently in School Archives and in Synergetic. The daily attendance register records the following information for each student:

- Daily attendance.
- Absences.
- Reason for absence.
- Documentation to substantiate reason for absence.

The register is supported by the following key functions:

- Curriculum Services staff, who keep student class lists on the timetable and hence on the attendance register.
- Senior School staff must mark their attendance roll every teaching period and the Tutor Group period from 8.35 to 8.45am.
- Student Services follows unexplained student absences daily by sending an SMS to parents/guardians to find reasons for student absence and who, because of their investigations, enter absence codes onto the attendance roll.
- The International Student Coordinator, supported by Student Services and the Head of Senior School will check student attendance and investigate student attendance issues, where a student has been absent for more than five consecutive days without approval, or where a student is at risk of not meeting attendance requirements. They will conduct intervention measures considered necessary, and communicate with students, parents/guardians about attendance matters.





## Course Progress

Mentone Girls' Grammar monitors, records and assesses the course progress of each student for the course in which the student is currently enrolled.

The course progress of all students is continually assessed, and is available to all students, parents/guardians via the continuous online reporting provided via mConnect.

Course monitoring may take the form of:

- Written tests and exams.
- Teacher observations.
- Student feedback.
- Participation in class and class work; including class projects and assessment tasks.

Students who have begun part way through a Term will be assessed in accordance with the assessment schedule for each class.

At the end of each semester, the parents/guardians receive a formal school report.

To demonstrate satisfactory course progress, students are required to achieve competency as required by the school. If a student does not achieve competency as required by the School, the Head of Senior School will meet with the student to develop an intervention strategy for academic improvement. This may include:

- Tutorial help.
- Visit to the School Counsellor and/or School Educational Psychologist.
- Other intervention strategies as thought necessary.

Each student's individual strategy for academic improvement will be monitored by their subject teachers, International Student Coordinator, Head of Year, and where necessary the School Counsellor and/or School Educational Psychologist.

The International Student Coordinator gathers written feedback on each student's progress on a fortnightly basis for review at the regular fortnightly meeting with the Head of Wellbeing.

## Reporting unsatisfactory course progress or unsatisfactory course attendance

If the student does not show sufficient improvement academically and achieve satisfactory course progress by the end of the next assessment period, Mentone Girls' Grammar will advise the student, in writing, of its reasons and intention to report the student for breach of their visa and will advise that she has 20 working days in which to access the school's Internal Complaints and Appeals policy.

Mentone Girls' Grammar will only report unsatisfactory course progress or unsatisfactory course attendance in PRISMS in accordance with section 19(2) of the ESOS Act if:

- The internal and external complaints processes have been completed, and the decision or recommendation supports the registered provider, or
- The International student has chosen not to access the internal complaints and appeals process within the 20-working day period, or
- The International student has chosen not to access the external complaints and appeals process, or
- The International student withdraws from the internal or external appeals processes by notifying the registered provider in writing.



Mentone Girls' Grammar may decide not to report the International student for breaching the attendance requirements if the International student is still attending at least 70% of the scheduled course contact hours and the International student provides genuine evidence demonstrating that compassionate or compelling circumstances apply.



## Modes of delivery

Any online or distance learning must be in addition to minimum face-to-face teaching requirements approved by the relevant designated State authority or ESOS agency as part of the registration of the course, if applicable.

Mentone Girls' Grammar takes all reasonable steps to support International students who may be disadvantaged by:

- Additional costs or other requirements, including for International students with special needs, from undertaking online or distance learning,
- Inability to access the resources and community offered by the School, or opportunities for engaging with other International students while undertaking online or distance learning.

# Deferring, Cancelling, or Suspending International Student Enrolment

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 9

## Purpose

This policy outlines the circumstances in which International students and the School may defer, cancel or suspend enrolment at Mentone Girls' Grammar.

An International student may defer (before commencement), suspend (after commencement) or cancel their enrolment. The School can also initiate the suspension or cancellation of an International student enrolment.

## School-initiated deferral, suspension, or cancellations of student enrolment

Mentone Girls' Grammar may cancel or suspend the enrolment of the Student by giving notice of termination to the Parent in case of:

- The Student's unsatisfactory conduct, behaviour or attitude while attending school.
- The Parent not paying to Mentone Girls' Grammar any Tuition Fees required to be paid for the Student to undertake the Course.
- The Student breaches a condition of her student visa.
- The Student does not meet course progress or attendance requirements.
- Information about the Student or the Parent that Mentone Girls' Grammar is required by law to obtain is not provided to Mentone Girls' Grammar.
- The behaviour or conduct of the Parent towards Mentone Girls' Grammar or to any of its staff or other students breaches any Mentone Girls' Grammar code of conduct applying to parents including the Parent Code of Conduct.
- The Student's progress is such that, in the opinion of the Principal, the Student is not benefiting from the Course and other programs provided by Mentone Girls' Grammar.
- A mutually beneficial relationship of trust and cooperation between the Parent and Mentone Girls' Grammar or any of its staff has broken down such that it adversely impacts on the ability of Mentone Girls' Grammar to provide a meaningful education to the Student.
- Circumstances exist whereby the ongoing enrolment of the Student is untenable or is not in the best interests of the Student or Mentone Girls' Grammar.

Mentone Girls' Grammar will inform the student in writing the reasons for a potential suspension or cancellation and of their right to appeal through the internal complaints and appeals process, in accordance with the International Student Internal Complaints and Appeals requirements outlined in this framework.

The internal appeals process must be completed prior to the suspension or cancellation taking effect, unless the International student's health or wellbeing, or the wellbeing of others, is likely to be at risk.



## Student-initiated deferrals, suspensions, or cancellations of their enrolment

An International student may choose to defer their confirmed place in writing as outlined in the Enrolment Agreement after receiving a Confirmation of Enrolment and at any time before their commencement date. The parent or student should send the request for deferment or temporary suspension in writing to the School along with supporting documentation. A course variation will be recorded on PRISMS where necessary.

The School has the right to review or approve and offer a mutually agreed alternative.

Mentone Girls' Grammar may agree to defer or suspend the enrolment of a student if it believes there are compassionate or compelling circumstances to do so. These include, but are not limited to:

- Serious illness or injury, where a medical certificate says that the International student was unable to attend classes.
- Bereavement of close family members such as parents or grandparents (where possible a death certificate should be provided).
- Major political upheaval or natural disaster in the home country require emergency travel and this has affected the International student's studies.
- A traumatic experience, which could include:
  - involvement in, or seeing of a serious accident; or
  - witnessing or being the victim of a serious crime, and this has affected the International student (these cases should be supported by police or psychologists' reports); or
  - where the registered provider was unable to offer a pre-requisite unit, or the International student has failed a prerequisite unit and therefore faces a shortage of relevant units for which they are eligible to enroll.

When deciding whether compassionate or compelling circumstances exist, Mentone Girls' Grammar will consider documentary evidence provided to support the student claim and will keep copies of these documents on the student record.

A student may cancel their enrolment at any time in writing as outlined in the International Student Written Agreement. Fees in lieu of adequate notice will apply as outlined in the International Student Written Agreement.

Student must seek advice from The Department of Home Affairs on the potential impact on their student visa and report the change to their enrolment under section 19 of the ESOS Act.

# Internal Complaints and Appeals

## Source of Obligation

National Code of Practice for Providers of Education and Training to International Students 2018 (the National Code 2018).

- Standard 10

## Purpose

Mentone Girls' Grammar is committed to effectively managing expressions of dissatisfaction and will ensure that complainants are supported throughout the process.

This section outlines the complaints and appeals processes to ensure that grievances between Mentone Girls' Grammar and International students can be heard and addressed.

## Related documentation

To be read in conjunction with the Mentone Girls' Grammar Complaints Handling and Resolution Policy found on the school website.

## Complaint Handling process

Students should try to resolve their complaint initially with the help of the International Student Coordinator, however, where the matter cannot be resolved informally, the student may lodge a formal complaint to the Head of Senior School. If the complaint relates to the International Student Coordinator, the student may approach the Head of Senior School directly.

If a complaint cannot be resolved informally, a formal complaint may be lodged in writing by formal letter, email or by verbal communication to the Head of Senior School. Mentone Girls' Grammar will review and respond to all complaints or appeals made by International Students or their families relating directly to the school, third parties affiliated with the school, or educational agents.

The International Student and their Parents will be notified in writing of receipt of the formal complaint. International Student complaints cannot be anonymous as the School will be limited in the extent to which the complaint can be investigated.

The formal complaint process will be:

- Once the formal complaint has been received by the Head of Senior School, it will be reviewed within 10 working days of receipt.
- The complaint will be assigned to a relevant member of the Senior Management Team and Risk and Compliance Manager to manage and assess the complaint.
- The staff member will begin assessing the formal complaint within 10 working days of the student lodging it, which may include investigating the facts and evidence and meeting with any additional parties required and will finalise the outcome as soon as practicable.
- The International student will be given an opportunity to present their case at no cost and to be accompanied and helped by a support person at any relevant meetings, if needed.
- The assessment of the formal complaint will be conducted in a professional, fair, and transparent manner.
- A formal decision will be made.
- The International Student and their Parents will be notified in writing of the outcome, with reasons for the decision, the escalation process, and the right to appeal.

The formal Complaint Form can be downloaded by visiting the school website here:

<https://www.mentonegirls.vic.edu.au/about/child-safety-policies>



## Appeals Process

If a formal complaint is not resolved to the satisfaction of the complainant, it may, at the request of the complainant, be escalated to an internal appeals panel.

This process can only start once the complaint process has been finalised and the International Student is still dissatisfied with the outcome.

The appeals process will be:

- The International Student should lodge an appeal in writing to the Principal.
- The Principal will set up an Appeal Panel who will have the requisite independence from the issue at hand.
- The Appeal Panel will begin assessing the appeal within 10 days of the student lodging it, which may include investigating the facts and evidence and meeting with any added parties required and will finalise the outcome of the appeal as soon as practical.
- The International Student must be given an opportunity to present their case at no cost and to be accompanied and aided by a support person at any relevant meetings, if needed.
- The assessment of the appeal must be conducted in a professional, fair, and transparent manner.
- A formal decision will be made.
- The International Student and their Parents will be given a written statement of the outcome of the appeal, including the reasons for the outcome, and details of the right to an external complaints and appeals process at no cost.

## External Appeal

If an International student is not successful in Mentone Girls' Grammar's internal complaints handling and appeals process, Mentone Girls' Grammar will recommend the student of their right access an external complaint handling and appeals process. This advice must be given to the student within 10 working days of the completion of the internal complaints handling and appeals process.

The external complaints body for Mentone Girls' Grammar is the International Student Ombudsman.

Contact details are as follows:

Phone: 1300 362 072

Web: <https://www.ombudsman.gov.au/>

In most cases, the purpose of the external appeals process is to consider whether Mentone Girls' Grammar has followed its policies and procedures, rather than to decide in place of Mentone Girls' Grammar.

Mentone Girls' Grammar will immediately notify and implement the decision where the outcome of a complaint or appeal has been a recommendation in favour of the International student.

Mentone Girls' Grammar must only report to an International student for unsatisfactory course progress or attendance in PRISMS after:

- the internal and external complaints processes have been completed, and the breach has been upheld.
- the student has chosen not to access the internal complaints and appeals process within 20 working days.
- the student has chosen not to access the external complaints and appeals process; or
- the student withdraws from the internal or external appeals process by notifying Mentone Girls' Grammar in writing.

Once the external appeals process has been completed and it results in a decision or recommendation in favour of the student, Mentone Girls' Grammar will immediately implement the decision or recommendation and/or take the preventative or corrective action required by the decision of the



external appeals process. Mentone Girls' Grammar will also notify the student of the outcome and the action taken.

## Staffing

Mentone Girls' Grammar ensures that staffing resources are sufficient and appropriate for the size and scope of its overseas student program, in alignment with CRICOS Standard 11.1.

Staffing levels are regularly reviewed to confirm that the number of qualified academic, welfare, and support personnel is adequate to meet the educational and wellbeing needs of all overseas students.

Recruitment, induction, and professional development is maintained to ensure staff are equipped to deliver quality education and support services, with adjustments made as enrolments increase or program requirements change.

## Record Keeping

We acknowledge that good records management practices are a critical element of International Student Safety and Wellbeing and manage our records in accordance with our Records Management Policy and Procedures which are aligned with the Public Record Office Victoria Recordkeeping Standards and the Records, Retention and Disposal Schedule for Non- Government Schools guidelines.

All records and prescribed information about the accepted enrolment of each International Students are kept as set out in section 21 of the ESOS Act.

All written agreements as well as receipts of payments made by students' families under the written agreement will be kept for a minimum of 2 years after the person ceases to be an enrolled student.

Mentone Girls Grammar will review all records relating to accepted international students every 6 months to ensure accuracy. This includes written confirmation of:

- Students current Australian residential address
- Students contact phone number.
- Students email address.

### PRISMS - (Provider Registration and International Student Management System)

To ensure compliance with Section 21 of the ESOS Act, CRICOS Mentone Girls Grammar maintains an up-to-date and accurate student register that records details of all enrolled overseas students. This includes promptly updating enrolment information such as course commencement dates, changes to student details, and course completions or terminations. The school will report any variations through PRISMS within the required frames specified by the ESOS legislation. Maintaining the currency of this register is essential for meeting the provider's obligations under the Act, supporting visa integrity, and safeguarding the rights and welfare of international students.





## Changes to Registration Status

In accordance with CRICOS Standard 11.2, any change to the ownership, directorship, or key management of the provider must be identified and reported without delay to the Department. Staff or Council members who become aware of such changes are required to notify the Principal immediately. The Principal will verify the details of the change, including the effective date and supporting documentation.

Once verified, the Principal or delegate will notify the Department of Education through PRISMS or another prescribed channel within 10 working days of the change. Copies of all notifications, supporting evidence, and acknowledgement from the Department must be securely stored for a minimum of seven years.

## Privacy

Mentone Girls Grammar School collects, uses, and discloses information about children and their families in accordance with Victorian privacy laws, and other relevant laws.

## Governance Table

Record Number	POL-OSMP-001-2		
Date Reviewed	12 February 2025	Date Approved	12 February 2025
Document Owner	Principal	Document Approver	School Council
Review frequency	<ul style="list-style-type: none"> <li>The policy is reviewed at least every two years or more often if there is a major change to the ESOS Act or National Code of Practice for providers of education and training to Overseas Students 2018.</li> <li>The policy must be approved by the Governance Risk and Compliance Committee and endorsed by the School Council.</li> </ul>		
Scope	This policy applies to all International Students.		
References	<ul style="list-style-type: none"> <li>The Education Services for Overseas Students Act 2000 (ESOS Act)</li> <li>The National Code of Practice for Providers of Education and Training to Overseas Students 2018</li> </ul>		
Resources	<ul style="list-style-type: none"> <li>Child Safety Framework</li> <li>CRICOS registration</li> <li>Overseas Student Marketing Information Booklet</li> <li>EAL Framework</li> <li>Overseas Student Course Credit Policy</li> <li>Overseas Student Enrolment Agreement</li> <li>Overseas Student Fee Schedule</li> <li>Student Advocate Policy</li> <li>Younger overseas student Policy</li> <li>Homestay Policy</li> <li>Student Advocate Policy</li> <li>Homestay Agreement for students and homestay hosts</li> <li>Homestay inspection checklist</li> <li>Orientation Program (ppt and Handbook)</li> <li>Overseas Student Critical Incident Management Policy</li> <li>Overseas Student Transfer Policy</li> <li>Overseas Student Course Progress and Attendance Policy</li> <li>Deferring, Cancelling, or Suspending Overseas Student Enrolment Policy</li> <li>Overseas Student Complaints and Appeals Policy</li> </ul>		
Policy Management	This policy is administered by the Director of Enrolments.		