



THE HUTCHINS SCHOOL

# Education Services for Overseas Students

## POLICIES AND PROCEDURES



**HUTCHINS**

ESTABLISHED 1846



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THE HUTCHINS SCHOOL

# Education Services for Overseas Students

## Policies and procedures

<b>Relevant legislation</b>	Education Services for Overseas Students Act 2000 (Cth) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth) Privacy Act 1988 (Cth)
<b>Commencement date</b>	April 2015
<b>Last review date</b>	March 2025

### 1. Purpose

The purpose of these policies and procedures is to outline The Hutchins School's commitment to overseas students and to support its obligation of compliance with the Education Services for Overseas Students Act 2000 (ESOS Act) and the National Code of Practice for Providers of Education and Training to Overseas Students (National Code).

### 2. Scope

The policies and procedures contained within this document apply only to International Students. Where policies intended for the wider school community are considered relevant or appropriate for inclusion, they will be linked or referenced within the text.

### 3. Definitions

<b>ABSI</b>	Australian Boarding Schools International.
<b>Breach period</b>	For the purposes of monitoring course progress and attendance, a breach period is defined as a single study period (semester). A breach does not carry over beyond the current study period unless the student's academic or attendance performance remains unsatisfactory in the subsequent study period, in which case a new breach is recorded.
<b>CAAW</b>	Confirmation of Appropriate Accommodation / Welfare Arrangements

<b>Compassionate or Compelling Circumstances</b>	<p>Circumstances beyond the control of the student that are having an impact on the student's progress through a course. These could include:</p> <ul style="list-style-type: none"> <li>– serious illness, where a medical certificate states that the student was unable to attend classes;</li> <li>– bereavement of close family members such as parents or grandparents;</li> <li>– major political upheaval or natural disaster in their home country requiring emergency travel that has impacted on their studies;</li> <li>– a traumatic experience that has impacted the student (these cases should be supported by police or psychologist's reports where possible);</li> <li>– where the School was unable to offer a pre-requisite unit; and/or</li> <li>– inability to begin studying on the course commencement date due to delay in receiving a student visa.</li> </ul> <p>For other circumstances to be considered as compassionate or compelling, evidence would need to be provided to show that these were having an impact on the student's progress through a course.</p>
<b>CRICOS</b>	Commonwealth Register of Institutions and Courses for Overseas Students.
<b>eCoE</b>	Electronic Confirmation of Enrolment. This is a document issued by the registered provider to intending overseas students that must accompany their application for a student visa. It confirms their eligibility to enrol in a course at the School.
<b>Education Agent</b>	A person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the Education Agent may provide education counselling to overseas students, as well as marketing and promotion services to providers.
<b>ESOS Act</b>	Education Services for Overseas Students Act 2000
<b>Expected duration</b>	The length of time it takes to complete the course studying full-time. This is the same as the registered course duration on CRICOS.
<b>National Code</b>	The National Code of Practice for Providers of Education and Training to Overseas Students 2018
<b>PRISMS</b>	Provider Registration and International Students Management System. This is the system used by the secretary of the Department of Education and Training to process information from registered providers.

## 4. Supporting/related documents

This document is supported by and has relationships to:

- The Conditional Offer of Enrolment
- Boarding House Duty Folder
- Boarding House Staff Handbook

- Boarding House Standards
- Boarding House Statement of Guardianship
- ESOS Refund Request Form
- The Hutchins School International Handbook

Further supporting and related documents are available on the School's [Website](#).

## 5. Record keeping

This policy is to be kept for three (3) years until review, except where legislative or organisational change demands otherwise. The master copy is kept on [SharePoint Online](#) in read-only PDF form. All printed copies are uncontrolled.

## 6. Policy owner

The Principal.

## 7. Version control

Version	Author	Purpose/Change	Date
1.0	Policy & Compliance Manager	First release as a single document. Prior versions are now incorporated under this (1.0) designation. For older versions, please speak with the Policy & Compliance Manager.	01 July 2021
1.1	Policy & Compliance Manager	Minor textual review, correction of typographical errors.	01 December 2021
1.2	Policy & Compliance Manager	Significant review – removal of irrelevant information (e.g. Homestays, which the School no longer offers), textual review and update of links.	01 October 2024
2.0	Policy & Compliance Manager	Significant review – updates to all standards, primarily to bring language into line with the ESOS standards and make clarifications to process. No procedure changes, except: <ul style="list-style-type: none"> <li>• Section 5: <i>Procedure for responding to a missing or absconding student</i> - created in response to TASC communication (4 March 2025).</li> </ul> Added compliance matrix as attachment 2.	01 May 2025
3.0	Policy & Compliance Manager	Complete overhaul – added in row below for textual clarity and readability.	01 June 2025
<p><b>1. Language and accessibility adjustments</b></p> <ul style="list-style-type: none"> <li>• Plain English: Language throughout the document has been simplified for accessibility by international students and families.</li> </ul> <p><b>2. New/clarified procedural standards</b></p>			



**Marketing and information practices (Standard 1)**

- Proactive review mechanism added: all marketing materials (digital/print) are now reviewed in sync with the policy review cycle.
- Third-party accountability: Clearer oversight of Education Agents' materials, with a corrective action clause for breaches.

**Recruitment and enrolment (Standard 2–3)**

- Explicit ban on online/remote-only learning: Students must be enrolled full-time, in-person.
- Course duration now defined explicitly as an academic year.
- Clarification that RPL and course credit are not offered.

**English language proficiency (standard 2)**

- Tiered English entry criteria now formally specified by year level (Years 7–12), with specific AEAS/IELTS thresholds and permitted weeks of remedial English per level.
- Structured interview protocol: video call with Registrar for informal English and cultural suitability assessment has been formalised.

**Course qualifications and awards (Standard 2)**

- New section designates the qualifications, awards and outcomes for students in years Pre-K-10 and 11-12.

**Written agreements and payments (Standard 3)**

- No acceptance of any payment until written agreement is signed; funds received prematurely must be held in trust or returned.
- Added section at the end of the CoE (not in this document) informing students and parents/carers of the right to make complaints under Australian Consumer Law.

**Education Agents (standard 4)**

- Education Agents acting on the School's behalf must act in good faith, in the best interest of students, and declare conflicts of interest.

**Student visa requirements (Standard 8)**

- Added section requiring the School to notify a student of an enrolment extension, and to advise them to contact the Department of Home Affairs to determine whether it may impact their visa.

### 3. Policy additions

**Missing or Absconding Students (Standard 5.5)**

- Entirely new procedure created in response to TASC directive (4 March 2025).

### 4. Changes to monitoring and compliance

**Attendance and academic monitoring (Standard 8)**

- New multi-tiered escalation framework based on attendance percentages and academic results.
- Use of Power BI dashboards for real-time attendance tracking.
- Defined support plans:
  - *Attendance Support Plan (ASP)*: for 80–84% attendance.
  - *Academic Monitoring Plan (AMP)*: for multiple academic concerns.
- Teaching staff responsibilities: clear expectations for tracking, notifying, and escalating academic issues (email templates, Synergetic tagging, etc.).
- Head of House responsibilities formalised: weekly risk reviews and response coordination.

**Visa breach reporting**

- Explicit integration with PRISMS: new protocols for when and how to report breaches.

### 5. Refunds and legislative compliance

- Updated reference: refund calculations now refer to the *2024 legislative instrument* (F2024L01231), replacing older links.

### 6. Younger student welfare and accommodation (Standard 5)

- Clarified policy:
  - No boarding for students below Year 7 unless special approval.
  - All Year 7–12 international students must reside in the School's boarding house unless a direct family member over 21 is approved.
- Temporary accommodation approvals: strict written approval and assessment process for host families during term breaks.



## ESOS Standard 1

# Marketing and information practices

Marketing of The Hutchins School (the School) is conducted in a professional, accurate and ethical manner that respects and upholds the integrity and reputation of the international education industry in Australia and is compliant with Australian Consumer Law (ACL).

The School's CRICOS code and full legal name are displayed at all of its campuses and on all written material (including electronic media) that is used for marketing/corresponding with international students. In keeping with the ESOS Act, this specifically includes documents and digital resources that are:

- used in the enrolment of, or offering to provide a course to an overseas student;
- inviting a student to undertake or apply for a course; and/or
- used to indicate that the School is willing and/or able to provide a course to an overseas student.

The School will not provide students with false or misleading information or advice. Under the requirements of the National Code, the School will ensure that its information provision includes:

- detail regarding any work-based training that students are required to undertake as part of a course (including nature, duration and whether the placement is mandatory or assessed, in accordance with Standard 1.2.2 of the National Code);
- prerequisites (including those for English language proficiency) for entry into those courses; and
- any other relevant information.

Where relevant, the School will clearly state its association or relationship with another registered provider that may offer services and/or courses on the School's behalf. This information is transparently disclosed on the School's website, in pre-enrolment information and in relevant student agreements.

The School will not commit to secure a migration outcome on any student's behalf, nor guarantee a successful educational assessment outcome for any student (or intending student).

The School conducts periodic reviews of all marketing and promotional material (in alignment with the review cycle of this document) to ensure ongoing compliance with the ESOS Act and National Code Standard 1. This includes auditing digital content, brochures and any agent-distributed material.

Where third parties (e.g. Education Agents) are involved in marketing, the School also monitors these agents' conduct to ensure ongoing compliance with the ESOS Act and the National Code and will take immediate corrective action should an agent be found to provide false, misleading or non-compliant information. All materials used in marketing the School's programs and services to international students and their families must be pre-approved by the Marketing Department.

Digital and print materials produced by the School are written in plain English and, where appropriate, translated into the student's first language to support an informed enrolment decision.





## ESOS Standard 2

# Recruitment of overseas students

The School's recruitment processes are designed to be culturally appropriate and student-centred, ensuring that prospective international students are fully informed, provided with accurate, current and understandable information and supported in their decision-making. Language used in recruitment materials will be in clear, plain English and reviewed in accordance with the cycle of this policy for cultural sensitivity.

The School's *Conditional Offer of Place* contains the following information, as prescribed by the ESOS Act:

- the requirements for acceptance into the School and the student's requested course(s), including the minimal English language proficiency, educational qualifications or work experience required;
- the CRICOS course code, course content, modes of study (including online, where relevant), placements and assessment methods;
- course duration (defined as an academic year) and holiday breaks (including the expectations for living/travel arrangements over those breaks);
- the course qualification, award or other outcomes;
- campus locations and facilities, equipment and learning resources available to students;
- accommodation options and indicative costs of living in Australia;
- indicative tuition and non-tuition fees;
- the School's cancellation and refund policies on those fees; and
- the grounds on which an enrolment may be deferred, suspended or cancelled.

The School's [website](#) contains other documents linked to Standard 2, including:

- links to the ESOS Act and the National Code and their associated materials;
- links to further policies and procedures (including this document); and
- a link to International Education's *Guide to ESOS*.

Under Standard 2, the School is also required to produce a documented policy and process for assessing and recording Recognition of Prior Learning (RPL) if it intends to assess RPL or grant course credit. The School does not assess RPL nor grant course credit (which is also why Standards 12 and 13 are not addressed here).

Students receive all the following in print and/or electronically:

- the International Student Handbook;
- The ESOS Policies and Procedures (this document);
- the School Prospectus; and
- a link to the School's website (which includes entry requirements, English language competency requirements, refund policies and more).

It is the policy of the School (in line with Standard 8.19 of the National Code) that international students will only undertake online or remote learning in addition to a full-time, face-to-face enrolment.



## ESOS Standard 2

# Assessing English proficiency

The School will endeavour to ensure that student qualifications, experience and English language proficiency are appropriate for all of its courses. All documented student qualifications (including those for English proficiency) will be checked for authenticity. Only original copies of documentation or suitably certified original copies will be accepted.

## Assessing English proficiency

The School will assess each course application against its entry requirements (including English proficiency). The purpose of this assessment is to ensure that students have the appropriate qualifications, experience and English proficiency for each course in which they are enrolling.

The School accepts English assessments from either the Australian Education Assessment Services (AEAS) or the International English Language Testing System (IELTS). These tests provide baseline scores in English, Mathematics and abstract (non-verbal) reasoning, which help the School decide whether its courses are suitable for a prospective student. Students who do not meet the required standards will not be enrolled. If it is later found that a student does not meet the English language requirements, the School may issue a conditional electronic Confirmation of Enrolment (eCoE), allowing the student to take an English test after arriving in Australia.

As part of the enrolment process, further assessments are carried out. These include a review of the student's English test results from AEAS or IELTS and a video call with the School's Registrar. This call gives the Registrar an opportunity to informally assess the student's ability to communicate in English and to check whether the student would be a good cultural fit for the School, in line with the School's obligations under Standard 5 of the National Code. The aim is to make sure the student feels welcomed in a culturally sensitive and supportive environment. During this call, the Registrar also discusses areas of school life beyond the classroom where the student might enjoy participating or build social connections.

The assessment of students against English language competency varies according to year level:

- **For Years 11–12:**  
Students must demonstrate a high level of English proficiency prior to enrolment.  
This is measured as a minimum **AEAS English score of 85+** or **IELTS 7.0+**. No remedial English is accepted at this level.
- **For Year 10:**  
Students may be accepted with up to **4 weeks** of remedial English language instruction.  
This equates to an **AEAS English score of 75–84** or **IELTS 6.0–6.5**. A conditional CoE may be issued if the student agrees to complete the required English study onshore.
- **For Year 9:**  
Students may be accepted with up to **8 weeks** of remedial English.

This corresponds to an **AEAS English score of 70–74** or **IELTS 5.5–6.0**, subject to satisfactory academic and cultural suitability.

- **For Year 8:**

Students may be accepted with up to **12 weeks** of remedial English.

Expected English levels are **AEAS 65–70** or **IELTS 5.0–5.5**, with the expectation that language skills will be supported across the curriculum.

- **For Year 7:**

Students may be accepted with up to **16 weeks** of remedial English instruction.

This includes applicants with **AEAS scores as low as 60** or **IELTS 4.5–5.0**, contingent on age-appropriate readiness and pastoral care considerations.



## ESOS Standard 2

# Course qualifications and awards

Students enrolled in Kindergarten to Year 10 at Hutchins undertake a course of study aligned with the Australian Curriculum, adapted to reflect the School's Christian ethos and academic standards. While no formal qualification is awarded at the end of Year 10, students receive comprehensive academic reports twice per year (in Terms 2 and 4), which record their progress in all subject areas as well as learning behaviours such as effort and application. These reports align with national standards and are used to support subject selection and transition into senior secondary study.

Students in Years 11-12 work towards the Tasmanian Certificate of Education (TCE), the formally recognised senior secondary qualification in Tasmania. The TCE is awarded by the Office of Tasmanian Assessment, Standards and Certification (TASC) and certifies that a student has met all requirements in literacy, numeracy and overall achievement. The TCE is recognised by all Australian universities and many international institutions as an entrance qualification for further study. Students receive formal school reports at the end of Terms 2 and 4, which reflect both academic achievement and application. These reports support subject guidance, academic interventions and preparation for university or other post-secondary pathways.



### ESOS Standard 3

# Enrolment and written agreements

Under Standard 3 of the National Code, the School is required to enter into a written agreement with any intended overseas student, which must be signed or otherwise accepted by the student either with or before the acceptance of any fees. This written agreement takes the form of the Conditional Offer of Place, which includes:

- the courses in which the student is to be enrolled, the expected course start date, the location(s) at which the course will be delivered and the offered modes of study for the course (including online etc.);
- all prerequisites for entry into the course(s) requested, including English language requirements;
- any conditions that are imposed upon the student's enrolment;
- all tuition fees payable for the course, the periods for which those fees are payable and the available payment options;
- details of any non-tuition fees that the student may occur;
- information about the circumstances in which the student's personal information may be disclosed by the School (including to the Department of Home Affairs, the Department of Education, or state and territory government agencies) in accordance with the Privacy Act 1988;
- a link to the School's [Complaints and Grievances Policy](#);
- accompanying information specific to international students (contained within this document);
- information regarding the student's obligation to retain a copy of the written agreement and receipts of any payments of tuition or non-tuition fees; and
- a stated requirement under which the student must notify the School of any changes to their residential address, mobile number, email address, or emergency contacts within seven days of the change.

Further information is provided within the Conditional Offer of Place regarding the refund request process for both tuition and non-tuition fees according to Standard 3.4. This information is also available in the Refund Conditions section of this policy document, while the [Refund Request Form](#) is available online.

The School retains records of all written agreements and the receipts associated with them. Unless extenuating circumstances exist that require otherwise, such records are retained indefinitely.

Any changes to students' enrolments will be advised to students and their parents/carers in writing. The School will require a signed copy of this document as evidence of being advised, understanding and accepting/rejecting the changes.

Overseas students are also subject to the School's overarching [Enrolment, Inclusion and Exclusion Policy](#), which is provided to families both on the [School policy](#) section of the website and on the [International Enrolments](#) page.

In the event that amendments are made to the terms of enrolment after signing, students and parents/carers will be notified in writing (with at least one term's notice prior to the commencement of any change). Any substantive changes will require a countersigned variation to the agreement, which will be retained on file as evidence of acceptance.

## Payment of fees

No tuition or non-tuition fees will be accepted or processed by the School until a written agreement has been received and signed. Any funds received prematurely by the School will be held in trust until the agreement is finalised, or returned (at the School's discretion).



**ESOS Standard 3**

# Refund conditions

A completed Conditional Offer of Place, together with the accompanying Entry Agreement: Acceptance of Offer, forms the basis of a business agreement between the School and the enrolling student (and their parent/carer and agent, where relevant). The fees, both tuition and non-tuition, are stated within this agreement and received before the completion of enrolment.

As part of the enrolment, families are additionally provided with the International Student Enrolment Agreement (incorporating the [School Rules](#)) to be signed. This refers families to the [International Student Handbook](#) that outlines payment of school fees conditions and refunds. This information also appears on the Refund Application Form.

SCENARIO	REFUND
<b>Visa refused</b>	If your visa application is refused, a full refund of fees will be made within four weeks minus the lesser of the following: (a) 5% of the course fee received by the provider in respect of the student before the default day; or (b) \$500
<b>Cancellation 8 weeks or more</b> before the agreed start date of the initial enrolled course as indicated on the most recent Letter of Offer	100% of all up-front fees paid less \$300 Administration costs.
<b>Cancellation 4-8 weeks before</b> the agreed start date of the initial enrolled course as indicated on the most current Letter of Offer	50% of all up-front fees paid less \$300 Administration costs.
<b>Cancellation under 4 weeks</b> before the agreed start date of the initial enrolled course as indicated on the most current Letter of Offer	NO REFUND*
<b>Cancellation after the agreed start date</b> (course not taken up)	NO REFUND*  Additionally, one term's tuition fees in lieu of the School receiving in writing, one term's notice of withdrawal from the course (following commencement) will be charged.

<b>Course abandoned without a written term's notice in writing following commencement</b>	NO REFUND*  Additionally, one term's tuition fees in lieu of the School receiving in writing, one term's notice of withdrawal from the course (following commencement) will be charged.
<b>Student breaches their visa conditions</b>	NO REFUND*
<b>Visa cancelled or student expelled</b> due to actions of the student	NO REFUND*
<b>PROVIDER DEFAULT:</b>  1. If for any reason the School is unable to offer a course on an agreed starting day for the course and the student for some reason cannot be placed or refuses placement in an alternative course arranged by the School; OR  2. If for any reason the School is unable to continue offering a course after the student commences a course and the student for some reason cannot be placed or refuses placement in an alternative course arranged by the School.	A FULL REFUND of any unspent pre-paid tuition fees* paid to the School will be made within 14 days of the agreed course starting day.

*\* In exceptional circumstances, such as serious illness or other compassionate grounds, a partial refund may be considered at the Principal's discretion. Documentary evidence will be required.*

#### **PROVIDER DEFAULT:**

In accordance with Standards 14 and 15 of the National Code, the School is committed to upholding its obligations in the event of provider default. Where the School is unable to offer or continue a course, students will be offered a full refund of unspent pre-paid tuition fees or placement in an alternative course. If neither refund nor alternative placement can be arranged, students will be referred to the Tuition Protection Service (<https://tps.gov.au>).

- In the case of the School not being able to provide the course in which the student is enrolled, unspent pre-paid tuition fees will be calculated according to the Education Services for Overseas Students (Calculation of Refund) Instrument: <https://www.legislation.gov.au/F2024L01231>
- If the student changes visa status (e.g., becomes a temporary or permanent resident) he/she will continue to pay full overseas student's fees for the remainder of that study period. This is due to funding and enrolment classification rules that apply for the full duration of the period for which fees have already been set and invoiced.



## ESOS Standard 4

# Education Agents

Education Agents are engaged to formally represent the School under the following conditions:

- the Education Agent must understand and adhere to Standards 1 – 4 of the ESOS National Code (the Code) and in particular, Standard 4;
- the Education Agent signs and abides by the conditions of the School's written Agency Agreement;
- the Education Agent responds appropriately to school monitoring activities and corrective and preventative action and understands the grounds for termination of the agreement as outlined in Standard 4.4 of the ESOS National Code; and
- the Education Agent accurately promotes the services and facilities provided by the School and uses up to date marketing materials as supplied.

All Education Agents acting on behalf of the School must:

- act honestly and in good faith and in the best interests of the student at all times; and
- declare in writing any actual or potential conflicts of interest and take all reasonable steps to avoid conflicts with their duties as Education Agents representing the School.

The School will not accept a student from an Education Agent if it is known or suspected at any time that the agent:

- engages in or has previously engaged in dishonest practices;
- deliberately attempts to recruit a student within the first six months of their study with another provider;
- facilitates the enrolment of a student that not comply with visa conditions, or is not a bona fide student; or
- provides immigration advice where he/she is not authorised to do so under the Migration Act 1958.

The School may at times receive a student enrolment application from an Education Agent on behalf of a parent/carers. Because such an Education Agent has not been engaged by the School to formally recruit students on the School's behalf, they would fall outside the scope of Standard 4.

A list of Education Agents with whom the School has a formal written agreement may be found at <https://www.hutchins.tas.edu.au/international-agents/>. These agreements are regularly reviewed and renewed. The agency list is dynamic and will change according to internal review processes.

Information provided about Education Agents includes at a minimum:

- agency name;
- name of principal agent;
- the legal entity of the agency;
- street address(es) of the agency; and
- contact details (phone/email/fax/website).

The requirements of Standard 4 of the National Code are also incorporated into the [Education Agent Application Form](#), [Education Agent Agreement](#); and the [Education Agent Fee Structure](#).



## ESOS Standard 5

# Younger overseas students

The primary focus of Standard 5 of the National Code is the health, safety and wellbeing of overseas students under the age of 18. The School has an established suite of policies written and designed to demonstrate its commitment to child welfare and protection, most notably including the:

- [Code of Conduct](#)
- [Commitment to Kindness](#)
- [Safeguarding Children Reporting Policy](#)
- [Practice and Behaviour Standards](#)
- [Safeguarding Children and Young People Policy](#)

These policies are supported and underpinned by a series of reporting mechanisms that include the [Inappropriate or Reportable Conduct Form](#) and [Complaints and Grievances Form](#), which are both available to all students at the School (with specific provisions for International Students). All staff at the School are required to apply for and maintain Registration for Working With Vulnerable People (RWVP) and Safeguarding Children qualifications through the Australian Childhood Foundation (ACF).

The School has a strong focus on ensuring that children and young people are aware of its commitment to their health and safety and to providing avenues for reporting issues of concern through age and culturally appropriate information, including:

- the [International Student Handbook](#);
- modified, age-appropriate versions of policies and procedures that affect children and young people;
- physical cards (on a lanyard) containing emergency contacts and appointed persons in the School for support and advice; and
- intentional teaching programs to support education around critical child safety issues (e.g. Bravehearts, SASS) across multiple year levels.

The School accepts responsibility for approving accommodation, support and general welfare arrangements for all overseas students under the age of 18 for whom it issues a Confirmation of Appropriate Accommodation and Welfare (CAAW) under the Migration Regulations 1994.

The School acknowledges its ongoing obligations under Standard 5 of the National Code to implement, monitor and review appropriate welfare arrangements, including accommodation approvals, Working With Vulnerable People registration for staff and the availability of age-appropriate support mechanisms. The provisions and expectations relevant to these obligations are detailed in the following sections.

## Expectations for accommodation

The School requires all international students in Kindergarten to Year 6 who require a visa to have one of their parents residing in Hobart. Boarding students are not permitted until Year 7 (or for Year 6 level students where an

older brother is also residing within Burbury House). Entry for a Year 6 boarder needs to be approved by the Deputy Principal and the Head of Boarding.

International students in Years 7-12 who require a visa and do not have a parent residing in Hobart will live in the School's boarding house to ensure the safety, academic and pastoral care of each student is provided. Where legally binding arrangements exist, the School may agree to allow an alternative arrangement whereby the student resides with a direct family member over the age of 21 years; however, this arrangement must be approved by the Deputy Principal.

Students in the boarding house are accommodated in twin-share style rooms. Single rooms are allocated to boys in Year 12 and Year 11 (where space permits). The School's catering service provides a familiar diet for overseas students whilst also catering for specific dietary requirements.

The focus of a student education at the School is directed towards membership in a Christian learning community that provides a balanced and holistic education in a safe, supportive and encouraging environment. This focus - along with the School's duty of care - could be compromised if international boarders were permitted to spend significant time off-campus involved in activities other than those for which they are enrolled. It is recommended that an international student does not engage in part-time or casual employment whilst they are enrolled at the School unless specific approval has been provided by the Deputy Principal and in agreement with the Head of Boarding. This recommendation is in place to ensure that the student's welfare is not compromised by outside pressures and that the student can focus their energies on academic study and extra-curricular commitments. Academic progress is a condition of a student maintaining their visa.

The School will advise the Department as soon as practicable if the student will be cared for by a parent or nominated relative approved by the Department and a Confirmation of Appropriate Accommodation and Welfare (CAAW) is no longer required. In accordance with the National Code (Standard 5.3.6.2), the School will also notify the Department within 24 hours if it is no longer able to take responsibility for approving the student's welfare arrangements.

## School holiday arrangements

The boarding house closes at the end of each term. When the boarding house is closed, boarders are required to return to their parents or reside with direct family members over the age of 21 years. If circumstances demand it, Burbury House may remain open during school holiday periods. If so, a minimum of 10 boarders is required and additional fees will apply. The School's preference is that students return home and spend some quality and restful time with their families at the end of each term.

## Homestay provisions

The School does not support Homestay.

## Temporary accommodation or host family arrangements

International students may request to stay with a local host family during term breaks or leave periods. Where the School has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW), it retains legal responsibility for the student's welfare, including approval and oversight of any such temporary arrangements. As such, any request for leave from the boarding house to reside with a host family must be submitted in writing in advance, with signed approval from the student's parent or legal guardian.

All proposed host families must be assessed and approved by the School and must demonstrate that they can provide appropriate care and supervision. This includes Working With Vulnerable People (RWVP) registration (or equivalent), a current residential address and agreement to school expectations regarding student care. The School will not permit leave with unapproved hosts or informal arrangements. These controls ensure the student's welfare is not compromised and that all accommodation arrangements meet the regulatory expectations for safety, appropriateness and transparency.

The School does not engage third parties to organise or assess welfare and accommodation arrangements.

## Communication with parents/carers

The School maintains regular communication with the parents/carers or legal guardians of all overseas students under the age of 18 for whom it has issued a CAAW. This contact includes academic progress reports issued at least twice per year, along with any interim reports and formal notifications regarding attendance, behaviour or wellbeing concerns.

In addition to scheduled reporting, the School will initiate timely contact with parents/carers or legal guardians should any pastoral, disciplinary or academic issue arise that may affect the student's welfare. All such communication is documented and undertaken by relevant senior staff, such as the Head of House, Head of Boarding or Deputy Principal in a manner that is culturally sensitive and accessible. Parents/carers and legal guardians are encouraged to maintain open dialogue with the School and translation support will be provided where needed to ensure that information is clearly understood.





## ESOS Standard 5

# Student transfers

### Transfer of students – welfare arrangements

The School ensures that all transfer requests are managed transparently, lawfully and in accordance with students' best interests. It will not knowingly enrol a student wishing to transfer from another registered provider prior to the student completing six months of their principal course of study, unless:

- the releasing provider has issued a formal release;
- the student's original provider has ceased to operate or has had its registration cancelled;
- the original provider has had a sanction imposed that prevents the student continuing their course; or
- the circumstances otherwise meet the exemptions outlined in Standard 5.7.1.

The School verifies this through PRISMS (Provider Registration and International Student Management System) and documents all relevant evidence before enrolment proceeds.

### Processing student requests to transfer from the School

Where a student currently enrolled at the School requests a transfer to another registered provider within the first six months of their principal course, the School follows the process outlined in Standard 5.7.2. This includes:

- assessing the transfer request in line with the School's documented policy (this document);
- ensuring the request is considered in the context of the student's welfare, academic progress, and reasons for the request;
- issuing a release through PRISMS if the request is approved and in the student's best interests; and
- informing the student in writing of the outcome of their request, including reasons where the transfer is refused and advising of their right to appeal the decision through the School's complaints and appeals process.

All decisions are made in accordance with Standard 5.7.2 to ensure fairness, transparency and compliance with Commonwealth legislative requirements.

Where the School enrolls an overseas student under 18 years of age who has existing welfare arrangements approved by another registered provider (via a CAAW letter), the following provisions apply to ensure continuity of care:

The School will negotiate the exact transfer date for welfare arrangements with the releasing registered provider to ensure there is no gap in CAAW coverage. This date will be mutually confirmed in writing by both providers and reflected in PRISMS to ensure visa compliance.

The student and their parents/legal guardians will be clearly informed in writing that the student must maintain their approved welfare arrangements without interruption. The student must either:

- remain in the current approved arrangement until the new provider's welfare takes effect;

- obtain new welfare arrangements approved by Immigration; or
- return to their home country until the new arrangement is in place.

This information will be provided at the time of enrolment and confirmed again in the School's Welfare and Accommodation Agreement, the Letter of Offer and the International Student Enrolment Agreement, where applicable.

Failure to maintain continuous welfare arrangements may result in visa non-compliance and the School will not assume responsibility until formal acceptance and CAAW issuance are complete.



## ESOS Standard 5

# Procedure for responding to a missing or absconding student

*(aligned with ESOS Standard 5.5 – Welfare of younger students)*

In accordance with Standard 5.5 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, the School is required to take all reasonable steps to ensure the welfare of international students under the age of 18 for whom it has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW).

Where a student cannot be located and there are concerns for their welfare, the School must act immediately to locate the student and notify relevant authorities. This procedure outlines the required actions in such cases, including escalation and reporting to Tasmania Police, the Department of Home Affairs and the Department of Education (ESOS Compliance).

The importance of prompt and thorough action has been reiterated in a communication from TASC, the Designated State Authority for Tasmania (dated 4 March 2025), which emphasises the rising incidence of student absconding and the need for immediate, well-documented responses from CRICOS providers.

Where the School is notified that a student has absconded, or where the student cannot be located, the School will:

## 1. Conduct an immediate welfare check

Upon suspicion that a student is missing or has absconded from approved accommodation or school supervision:

- the Head of Boarding, Registrar or Deputy Principal must attempt immediate contact using all available channels (phone, email, messaging apps); and
- peers, housemates and known associates may be discreetly questioned for recent sightings or communications.

## 2. Complete an internal notification

If the student cannot be contacted within 2 hours:

- escalate to the Deputy Principal and Principal;
- notify the School's Critical Incident Team;
- review CCTV and to assist in establishing last known location.

If no contact is established within 4 hours **and/or** there are concerns for the student's welfare, the School will proceed to step 3.

### 3. Make an emergency notification

- **notify Tasmania Police immediately**  
(emphasising the student is a minor or visa-holding international student); and
- as soon as practicable\*, lodge a report with:
  - **TASC** (as Designated State Authority);
  - **Department of Home Affairs**; and
  - **ESOS Compliance (Australian Government Department of Education)**.

*\*Note: "As soon as practicable" is interpreted as immediately during business hours or by the next business day if out-of-hours.*

### 4. Notify the student's family

- The student's **parent/carer or legal guardian** must be contacted at the earliest appropriate time, with discretion and cultural sensitivity.

### 5. Records management

- All attempts at contact and notifications must:
  - be dated, time-stamped and recorded;
  - be filed in the student's record on Synergetic (DocMan); and
  - include copies of emails, phone call logs and internal meeting notes.

### 6. Ongoing reporting and escalation

- The Principal (or their delegate) will maintain regular contact with police and relevant authorities until the student is located.
- The Principal (or their delegate) will report outcomes or developments to all previously notified bodies.

### 7. Post-incident review

- Once resolved:
  - the Principal may convene a Critical Incident Team debrief to assess response effectiveness;
  - the School will update the student's wellbeing plan and review their accommodation or support arrangements as appropriate.

If the student remains missing beyond 7 days, the School will initiate formal withdrawal and report via PRISMS as per visa condition 8202 and provider default obligations.



## ESOS Standard 6

# Student support services

The School will support students to adjust to study and life in Australia and will provide an age and culturally appropriate orientation program for all new students that includes:

- support services to assist students to transition to life and study at the School;
- a support session around cultural norms for physical contact, behavioural boundaries and the reporting of concerns relating to abuse (whether sexual, physical or any other);
- legal, emergency and health services that are available to overseas students;
- complaints and grievances policies and procedures;
- student visa conditions, highlighting requirements for course attendance and progress;
- school facilities, resources, rules and expectations; and
- a reminder to update address, phone and email at least every six months.

This orientation program is conducted with every new student from the day of arrival (though some elements (e.g. support sessions) may be held at defined intervals throughout the School year). The checklist of this program (dated and signed by staff and students) will be retained on file.

Pre-arrival orientation information is provided to all international students via email and accessible online, including living arrangements, school expectations, local emergency contacts and visa compliance responsibilities.

## Procedures for supporting overseas students

All student welfare/support issues should be reported to the relevant staff: Chaplains, Heads of House, Heads of School and Head of Year in Middle School. The School provides a counselling service for students and families and staff. Further details may be found at <http://www.hutchins.tas.edu.au/counselling/>

Students who require assistance may contact either their school mentor or the Head of Boarding. From this point, others become involved as required (for example, the Chaplain, Head of House, Head of School or Head of Year). Where a member of the teaching staff becomes aware of an issue with an overseas student they are asked to speak with the Deputy Principal.

## Critical incident management

The School has a Critical Incident Management Plan that will be activated in the event of a critical incident. While boarding and EAL staff are explicitly available to support international students, the School's full resources are available to call upon if needed.

All relevant staff receive this policy booklet to ensure that they are informed of their obligations toward overseas students. Relevant staff are also inducted into the Critical Incident Management Plan.

The School will identify and access appropriate post-incident support services and provide them to students as required.



## ESOS Standard 7

# Student transfers

## Outgoing student transfers

Overseas students are restricted from transferring from their principal course of study for six months. This restriction also applies to any course(s) packaged with their principal course of study. Exceptions to this restriction include circumstances where:

- the student's course or school becomes unregistered;
- the school has a government sanction imposed on its registration;
- a government sponsor (if applicable) considers a transfer to be in the student's best interests; or
- the student is granted a Letter of Release.

Students are welcome to apply to the Enrolments Assistant ([enrolments@hutchins.tas.edu.au](mailto:enrolments@hutchins.tas.edu.au)) for a Letter of Release, which would enable them to transfer to another education provider. However, if a student has not completed the first six months of the principal course of study or is under 18 years of age, conditions apply.

When assessing such a request for a transfer, the School will apply transparent and consistent criteria in line with Standard 7.2.3 and ensure that all decisions are clearly communicated in writing with reasons provided. All documentation, including signed copies of Letters of Release or Refusal, will be stored in the student's file indefinitely.

The School will only provide a Letter of Release to students before the completion of the first six months of their principal course where:

- the student has changed welfare and accommodation arrangements and is no longer living within a reasonable travel time from the School;
- it has been agreed by the School that the student would be better placed in a course that is not available at Hutchins;
- there is evidence of compassionate or compelling circumstances that would necessitate a transfer;
- there is evidence that the student's expectations of their current course are not being met;
- any other reason stated in the policies of the School; or
- any other reason provided by Standard 7 of the ESOS Act 2000.

Students under 18 years of age must also have:

- written evidence that the student's parent(s)/legal guardian supports the transfer;
- written confirmation that the new provider will accept responsibility for approving the student's accommodation, support and general welfare arrangements where the student is not living with a parent/legal guardian or a suitable nominated relative; and
- evidence that the student is living in Department of Home Affairs approved welfare and accommodation arrangements.



The School will not provide a Letter of Release to students before completing the first six months of their principal course where:

- the student's progress is likely to be academically disadvantaged;
- the School is concerned that the student's application to transfer is a consequence of the adverse influence of another party;
- the student has not had sufficient time to settle into a new environment to make an informed decision about transfer;
- the student has not accessed school support services which may assist with making adjustments to a new environment, including academic and personal counselling services; or
- school fees have not been paid for the current study period.

To apply for a Letter of Release, all students must first have a Letter of Offer from the receiving provider.

Applications to transfer to another registered provider may have visa implications. The student is advised to contact the Visa and Citizenship Office at the Department of Home Affairs as soon as possible to discuss any implications.

The address of the Visa and Citizenship Office is:

**Ground Floor, 188 Collins Street, Hobart, Tasmania, 7000**

Phone: 131 881

Email: [studentcentre@immi.gov.au](mailto:studentcentre@immi.gov.au)

If a Letter of Release is provided by the School it will provide information about whether the student has demonstrated a commitment to studies during the course, had a good attendance record for the course and paid all fees for the course.

All transfer applications will be considered within ten working days and the applicant notified of the decision.

Students whose request for transfer has been refused will be notified in writing of the reasons for refusal and may appeal the decision (within 20 days of being notified) under the [Complaints and Grievance Procedure](#).

The School will not finalise a student's refusal status in PRISMS in relation to a transfer request until one of the following conditions has been met:

- the student has been informed of the decision to refuse the transfer and has not accessed the School's internal complaints and appeals process within the prescribed 20 working day period;
- the student has accessed the complaints and grievances process and the outcome of that process supports the School's decision to refuse the transfer; or
- the student withdraws from the complaints and grievances process in writing.

This ensures that the student's right to procedural fairness is preserved in all cases, and that no reportable decision under section 19 of the ESOS Act is actioned prematurely.

All records regarding a transfer request, including the application form, the Letter of Release or the Letter of Refusal, plus documents associated with the decision-making process, will be retained for a minimum of two years after the overseas student ceases to be a student of the School (and unless extenuating circumstances apply, will be kept indefinitely).

## Incoming student transfers

The School will not enrol a student from another institution within six months of their principal course or courses taken before their principal course in a package of courses unless the conditions contained in this document are adhered to and there is no breach of Standard 7 of the National Code.

All Letters of Release or Offer received or provided will be kept on the student file for audit purposes including any refusals. Before enrolling students wishing to transfer from another provider, the Enrolments Assistant will check PRISMS records and take all reasonable steps to ascertain if a student is already enrolled with another provider. In most cases PRISMS will provide a warning for students already enrolled in another institution.

Neither the School nor its agents will not engage in the recruitment/poaching of students enrolled with other providers. Education Agents are monitored as per the stipulations in this document.

## Procedures for inbound transfers

PRISMS will be checked by the Enrolments Assistant to ensure that any incoming students are not already enrolled with another provider. All concerns must be reported immediately. All evidence (including Letters of Release) will be kept in student files.

Before the School may enter a new arrangement with another provider, CRICOS approval must be sought via the appropriate form with the designated authority.

No member of staff/agent is to engage in the recruitment/poaching of students from other providers. Students enrolled from other providers will be asked why they seek a transfer to the School and how they found out about Hutchins. Any inference of poaching will be fully investigated by the Registrar.

## Transfer requests within the first six months – assessment criteria and procedure

The School maintains a formal process for assessing transfer requests from overseas students during the first six months of their principal course of study. This process ensures compliance with relevant legislative obligations and supports student welfare and academic integrity.

Transfer requests will be considered on the basis of the student's best interests. The following circumstances are recognised as sufficient grounds to grant a transfer during the restricted period:

- the student is unable to achieve satisfactory course progress at the current level of study, despite having engaged with the School's intervention strategies implemented under Standard 8;
- there is documented evidence of compassionate or compelling circumstances;

- the School is unable to deliver the course as stated in the signed written agreement;
- there is evidence that the student's reasonable expectations about the current course have not been met;
- there is evidence that the student was misled by the School, an Education Agent, or any related party acting on behalf of the School, and as a result, the course is unsuitable for the student's needs and/or study objectives.

Requests for transfer must be submitted in writing, accompanied by a valid enrolment offer from the receiving registered provider. Applications will be assessed promptly, with due regard to the student's visa obligations and welfare considerations. Records of all requests, supporting evidence, assessments and decisions will be retained for a period of no less than two years following the cessation of enrolment.



## ESOS Standard 8

# Student attendance and course progress strategy

The School is committed to ensuring that all international students maintain satisfactory attendance and course progress in accordance with the Education Services for Overseas Students (ESOS) Act 2000 and the National Code 2018. This strategy provides a systematic, timely and supportive approach to identifying and assisting students who may be at risk of failing to meet required standards. These compliance obligations are integrated into the School's weekly Head of House pastoral care structure.

## Attendance monitoring and intervention strategy

### 1. Thresholds and definitions

**Expected attendance:** 90% minimum across total scheduled course contact hours per term.

**Serious concern threshold:** below 80% attendance, prompting immediate intervention.

Approved absences will be excluded from calculations if documented within 3 business days and may include:

- verified medical conditions (via certificate);
- critical personal or family circumstances (bereavement, legal or emergency situations)
- officially sanctioned academic, co-curricular or representative obligations; or
- extreme weather or school-directed absence.

### 2. Calculation method

**Attendance % = (Total Periods Attended) ÷ (Total Periods Offered – Approved Absences)**

This will be calculated weekly using Power BI and reported to Heads of House for review.

### 3. Attendance monitoring

Heads of House hold the primary responsibility for monitoring attendance. Students will be monitored via a dashboard (in Power BI) according to the thresholds defined in this document.

### 4. Escalation framework (attendance)

≥ 90%: No action required

85–89%: Monitored concern

- Head of House discusses concerns in weekly meeting.
- Parents/carers and student notified via informal email.

- Attendance expectations reiterated.

#### 80–84%: Formal concern

- Head of House sends formal email to student (carbon copy parents/carers): the 'Formal Notification of Unsatisfactory Attendance' (attachment 1).
- Student and parents/carers meet with Deputy Head of Senior School and Head of House.
- Attendance Support Plan (ASP) created in-meeting, which includes:
  - reasonable modifications to approved absences (as required and according to pastoral need); and
  - reasonable modifications to attendance, work and course requirements (at Deputy Head of Senior School's discretion and in consultation with teachers and Head of Teaching and Learning).
- Attendance closely tracked weekly for improvement.

#### < 80%: Critical intervention

- Student is referred to the Deputy Head of Senior School.
- A written notice of intent to report is issued, clearly stating:
  - the reasons for which the School intends to issue a report, namely:
    - the fact that the student's attendance has fallen below required thresholds; and/or
    - the fact that the student's course progress has been deemed 'unsatisfactory';
  - the School's intention to report the student via PRISMS for non-compliance; and
  - the student's right to access the School's internal complaints and grievances process within 20 working days.

No report is made to the Department of Home Affairs until the internal complaints and grievances process is concluded, unless the student chooses not to appeal or the appeal is unsuccessful.

## Course progress monitoring and intervention strategy

### 1. Standards for satisfactory progress

Students must:

- Receive A, B, or C grades in at least 90% of subjects.
- Achieve 90% satisfactory ratings or better for Application, Effort, Behaviour and Attitude.
- Be flagged for risk if they:
  - submit a major assessment that does not meet a passing grade AND the student sits below the 90% attendance threshold;
  - fail more than one subject in a reporting period; and/or
  - receive below satisfactory ratings in >10% of their report.

### 2. Course progress review process

- Reviewed in Terms 2 and 4 via formal academic reports.
- Reviewed in Head of House meetings to consider submission of major assessments (as per above), on the basis of pastoral care reports / teacher submissions.
- Preliminary concerns (e.g. multiple low performance indicators) may be flagged weekly in Head of House meetings.
- Heads of House review both academic indicators and pastoral insights weekly.

### 3. Escalation framework (course progress)

#### **Satisfactory progress:**

- No action required.

#### **Emerging concern (pre-report; sub-90% attendance OR >1 failure in a major assessment):**

- Class teacher email to student (carbon copy parents/carers and Head of House).
- Class teacher to create pastoral care record (see 'Teacher Responsibilities')
- Discussed in weekly Head of House meeting.
- Class teacher and Head of House to engage student in self-reflection conversation.

#### **Moderate concern (1 or more unsatisfactory ratings or subject failures):**

- Class teacher notifies student and parents/carers.
- Student placed on Academic Monitoring Plan (AMP), which includes:
  - consideration of reasonable adjustments (led by Deputy Head of Senior School, in consultation with class teachers); and/or
  - advice and support regarding (internal or external) academic assistance (discussion begins with class teacher, escalated to Heads of Faculty and Heads of House as required).
- Targets and support strategies are agreed, documented and reviewed fortnightly.

#### **Significant concern (failure in multiple subjects or across multiple domains):**

- Formal meeting with parents/carers, Head of House, Deputy Head of Senior School and Head of Teaching and Learning (if required).
- If no improvement by next reporting period, may trigger breach of visa conditions.

Where a student meets the criteria for 'significant concern', the School may again issue a notice of written intent to report, which will state:

- the reasons for which the School intends to issue a report, namely:
  - the fact that the student's attendance has fallen below required thresholds; and/or
  - the fact that the student's course progress has been deemed 'unsatisfactory';
- the School's intention to report the student via PRISMS for non-compliance; and
- the student's right to access the School's internal complaints and grievances process within 20 working days.



Again, no report is made to the Department of Home Affairs until the internal complaints and grievances process is concluded, unless the student chooses not to appeal or the appeal is unsuccessful.

## Teaching staff responsibilities

Teaching staff at the School are required to submit pastoral care reports to support a clear record of student academic progress.

Where a student:

- fails to achieve a passing grade in any three or more learning outcomes or criteria for a major assessment within any one course;
- fails to achieve a passing grade in any one or more learning outcomes or criteria for a major assessment AND sits below the 90% attendance threshold defined above;
- fails to achieve a passing grade AND sits below the 90% attendance threshold defined above; or
- fails (according to a summative report) to achieve a 90% pass rate OR 90% or better satisfactory or better rating in behaviour and attitude criteria;

staff responsible for the courses in which the student fails to meet these criteria are required to:

- send an email to the student (carbon-copying the Head of House and parents/carers) detailing (at a minimum):
  - the outcome of the assessment;
  - the criteria or learning outcomes in which the student has recorded an unsatisfactory result; and
  - links or references to the feedback already provided to improve performance (e.g. via Rory).
- Create a pastoral care record mirroring (copy/paste is fine) the detail of the email (both the content and the detail of the address line, date and subject), with the following metadata:
  - **Type:** classroom
  - **Subtype:** attendance
  - **Actions:**
    - Referral to pastoral leader; and
    - Parent contact.

This process allows for a flow of information through to Heads of House and Deputy Head of Senior School for review at their weekly meetings.

## Head of House responsibilities

Weekly Head of House meetings will:

- receive automated attendance summaries and academic flag data and use this information to identify:
  - at-risk students;
  - emerging issues; and
  - patterned concerns (e.g. repeated absences on particular days).

- maintain a weekly Risk Register, shared with Deputy Head of Senior School;
- co-ordinate early interventions, parental engagement and tailored support; and
- track progress of students on Attendance Support or Academic Monitoring Plans.

This centralises compliance within an existing, student-centred framework and ensures early identification, compassionate intervention and regulatory integrity.

## Record keeping and compliance

If, following the internal intervention process and the conclusion (or expiry) of a complaints and grievances process, a student still has not met the required standards for either attendance or academic progress, the School will:

- report the student via PRISMS for breach of visa conditions and at the time of reporting:
  - inform the student in writing that they are being reported for not meeting attendance or academic progress requirements;
  - advise the student to contact the Department of Home Affairs (Immigration) as soon as possible to understand how the report may affect their visa; and
  - retain a record of this advice on the student's file.

This step is taken in accordance with Standard 8.17 of the National Code 2018.

All interventions, meetings, and plans will be documented on the student's record. Formal monitoring plans will be retained indefinitely in Synergetic DocMan after the student ceases enrolment.

Any reportable breach will be managed under the School's Complaints and Grievances Policy, with timelines as per Standard 10 of the National Code.



## ESOS Standard 8

# Student visa requirements

### Monitoring of study load and course duration

The School monitors each student's study load to ensure they are able to complete their course within the expected duration, as specified on their Confirmation of Enrolment (CoE) and in accordance with the CRICOS-registered course duration. Students are expected to maintain a full-time study load unless otherwise approved.

A reduced study load may be permitted in certain circumstances, including compassionate or compelling grounds, participation in an approved intervention strategy, or where the student is nearing completion of their course and has only a small number of subjects remaining. All such variations must be approved by the Deputy Principal and recorded in the student's file. Where a student is granted a reduced load that will impact their course end date, a new CoE will be issued and reported through PRISMS within 14 days.

The School ensures that no student extends their duration of study unnecessarily and that all adjustments to course load are in line with Standard 8 of the National Code.

### Permitted modes of course delivery

In line with Standard 8 of the National Code, international students must undertake a full-time, face-to-face course of study at the provider's registered location. Online or distance learning is not permitted as a primary mode of delivery.

For ESOS purposes, online learning refers to study where the student and teacher primarily communicate through digital platforms, without requiring attendance at scheduled classes or contact hours. Distance learning is any off-campus study that does not involve regular attendance for tuition on campus.

Online lectures, resources or tuition that supplement scheduled classes do not count as online learning under the Code and are only used by the School to support face-to-face delivery. These do not (and must not) replace required classroom attendance.

Online or remote delivery is only permitted in exceptional circumstances, such as during the COVID-19 exemption period. Any such arrangements must comply with regulatory guidance and be temporary, documented, and monitored. The School ensures all international students meet attendance, progress, and delivery mode requirements under the ESOS Act and the National Code.

### Completion within the expected duration of study

As noted above, the School will monitor, record and assess the course progress of each student for the course in which the student is currently enrolled.

Part of the assessment of course progress at the end of each semester will include an assessment of whether the student's progress is such that they are expected to complete their course within the expected duration of the course.

The School will only extend the duration of the student's study where it is clear the student will not be able to complete their course by the expected date because of:

- compassionate or compelling circumstances;
- student participation in an intervention strategy as outlined above; or
- an approved deferment or suspension of study, granted under the School's Deferment, Suspension and Cancellation policies (Standard 9 of this document).

Where an extension of enrolment is granted, the School will notify the student in writing and advise them to contact the Department of Home Affairs to seek advice on any possible impacts on their visa, including the need to obtain a new visa if required. This ensures the student is fully aware of their responsibilities under visa conditions.

The School will then report this change via PRISMS within 14 days and/or issue a new COE if required. Variations and reductions to a student's workload may be permitted if a student is nearing course completion.

## Communication with co-operating schools

To ensure that co-operating schools are informed regarding the School's obligation toward international students, the School will:

- share records of international students with St Michael's Collegiate (via shared access to each other's databases, as per the Co-Operating Schools Agreement signed by both schools);
- provide an annual report of international students no later than Week 4 of Term 1 in any given year (this report must be accompanied by this document);
- provide the same list and documents to any Registered Training Organisation with which an international student is engaged; and
- send and receive records of attendance between co-operating schools to ensure accurate and timely reporting of student attendances and absences, and compliance with the requirements of the ESOS Act.

## Information provision at the School

The School is committed to ensuring that its teaching staff are aware of their responsibilities toward CRICOS registration and to the support of international students. The following measures are in place to ensure that staff are aware of the international students in their classes and to support them in reporting attendance and/or academic breaches under legislation:

- international students are flagged within our record management system (Synergetic);
- international students are also highlighted within our Schoolbox system (used for student information, reporting and assessment processes);

- staff are provided with an online CRICOS resource, which ensures the availability of these policies and procedures; and
- relevant staff are directly provided with training and professional development opportunities in respect to CRICOS and the provision of education for international students.



## ESOS Standard 9

# Deferring, suspending or cancelling enrolments

The School monitors student progression and records any changes on the student's file. Summation reports are issued twice yearly and interim reports are issued at the end of Term 1 and Term 3.

Any intervention required is acted upon and discussed with parents/carers as needed.

## Extending enrolments

The School will only extend an electronic Confirmation Of Enrolment (eCoE):

- under compassionate or compelling circumstances (refer to the definitions) when it is clear the student will not be able to complete by the end date of the eCoE;
- where intervention strategies have been implemented for students at risk of not completing satisfactory course progress; or
- where an otherwise approved deferment or suspension of study is in place.

Should students refuse to maintain an agreed/approved workload, the student will be firstly counselled and then warned of impending visa implications.

If there are compelling or compassionate reasons, the School may grant a student a less than 'full time' workload. This would be monitored as part of the student's intervention policy. The School would then issue a new eCoE should the student need to extend the duration of his course.

## Procedure for extending enrolments

The Enrolments Assistant is responsible for monitoring PRISMS regularly to ensure eCoEs are not issued for longer than the approved registered durations.

If the School decides to extend the duration of the student's study due to any of the conditions above, the Enrolments Assistant will report via PRISMS and/or issue a new eCoE if required. PRISMS will indicate if a new eCoE is required. This reporting must be done within fourteen (14) days of the determination that the student will need to change/extend the duration of their COE.

A student CAN enrol in less than a 'full-time' load in any study period if:

- there are compassionate or compelling reasons for reducing the load;
- the reduced load is part of the provider's intervention strategy;
- the student has studied, or plans to study, extra units/modules/subjects in another study period;
- the student has only a few units/subjects left to complete and they do not constitute a full-time load; or
- pre-requisite units are not available in that study period.

Where a suspension or cancellation of enrolment is proposed, the School will issue a 'Notice of Intention to Report' within 10 days of the internal review that includes details of the student's right to appeal within 20 working days. During this period, the student's enrolment will be maintained and monitored and the student will be supported to continue study under supervised arrangements if required.

## Suspension or deferment of study requested by a student

The School will only grant a deferment of commencement of studies for compassionate and compelling circumstances. These include but are not limited to:

- illness, where a medical certificate states that the student was unable to attend classes;
- bereavement of close family members such as parents/carers or grandparents (where possible a death certificate should be provided);
- major political upheaval or natural disaster in the home country requiring emergency travel that has impacted on studies; and/or
- a traumatic experience that has impacted the student (these cases should be where possible supported by police or psychologist reports).

Where a student has already commenced study, the same conditions apply. The final decision for assessing and granting a deferment or suspension of studies rests with the Principal. Deferment will be recorded on PRISMS within 14 days of being granted. The period of suspension will not be included in attendance calculations.

## Student-initiated cancellation of enrolment

All notification of withdrawal from a course or applications for refunds must be made in writing and submitted to the Enrolments Assistant. Please see the School's Refund Policy (contained within this document) for information regarding refunds.

## Assessing requests for deferment or suspension of studies

Applications will be assessed on merit by the Deputy Principal. All applications for deferment or suspension will be considered within 10 working days.

## School initiated exclusion from class (1 – 28 days)

The School may exclude a student from class studies on the grounds of misbehaviour by the student. Exclusion will occur as the result of any behaviour identified as resulting in exclusion in the School's [Code of Conduct](#), [School Rules](#) or [Enrolment, Inclusion and Exclusion Policy](#), which are provided at the time of enrolment and agreed to by the student and family. This includes vaping, smoking, drinking of alcohol and possession or taking of drugs.

Excluded students must abide by the conditions of their exclusion from studies which will depend on the welfare and accommodation arrangements in place for each student and which will be determined by the Principal.

Where the student is provided with homework or other studies for the period of the exclusion, the student must continue to meet the academic requirements of the course.

Exclusions from class will not be recorded on PRISMS.

Periods of exclusion from class up to and including 5 days will not be included in attendance calculations.

## School initiated suspension of studies (28 days+)

The School may initiate a suspension of studies for a student on the grounds of misbehaviour by the student. A suspension will occur as the result of any behaviour identified as resulting in suspension in the School's [Code of Conduct](#), [School Rules](#) or [Enrolment, Inclusion and Exclusion Policy](#).

Suspended students must abide by the conditions of their suspension from studies which will depend on the welfare and accommodation arrangements in place for each student and which will be determined by the Principal or Deputy Principal.

Students who have been suspended for more than 28 days may need to contact the Department of Home Affairs.

If special circumstances exist, the student must abide by the conditions of his suspension which will depend on the welfare and accommodation arrangements in place for each student and which will be determined by the Principal.

Suspensions will be recorded on PRISMS.

The period of suspension will not be included in attendance calculations.

## School-initiated cancellation of enrolment

The School may cancel the enrolment of a student under the following conditions:

- failure to pay course fees;
- failure to maintain approved welfare and accommodation arrangements (visa condition 8532);
- failure to adhere to the course progress and attendance requirements outlined in Standard 8 of the ESOS Act (detailed here within the section 'Student visa requirements'); and/or
- any behaviour identified as resulting in cancellation under the School's Code of Behaviour.

The School is required to report failure to maintain satisfactory course progress and failure to maintain satisfactory attendance to the Department of Home Affairs, which may impact a student's visa. The School may also cancel the enrolment of a student for failure to disclose a pre-existing condition requiring a high degree of specialised support or care.

Where a student's enrolment is cancelled, the Enrolments Assistant is required to:

- provide the student (in writing) with a letter of intent, which must include the reasons for seeking the termination of their enrolment; and
- advise the student of their right to initiate a complaints and grievances process, according to the [Complaints and Grievances Policy](#) and Standard 10 of the ESOS Act. An appeal made along these lines must be commenced within 20 days of the receipt of the letter of intent.



## Deferment, suspension and cancellation of enrolment: complaints and grievances

Student requests for deferment and suspension and cancellation of enrolment are not subject to the School's [Complaints and Grievances Policy](#).

Exclusion from class, school-initiated suspension and cancellation are all subject to the [Complaints and Grievances Procedure](#). For the duration of the internal complaints and grievances process, the School will maintain the student's enrolment and the student will attend classes as normal. The Principal will determine if participation in studies will be in class or under a supervised arrangement outside of classes.

If students access the School's complaints and grievances process regarding a school-initiated suspension or cancellation of enrolment, the change in enrolment status will not be reported in PRISMS until the internal complaints and grievances process is finalised unless extenuating circumstances relating to the welfare of the student apply.

*Note: Students may still access the external complaints and grievances process, but the School need not await the outcome of this process before changing the student's enrolment status in PRISMS. However, if the School has issued a CAAW for a student, welfare provisions under standard 5 of the National Code are applicable.*

Extenuating circumstances include those where:

- the student refuses to maintain approved welfare and accommodation arrangements (for students under 18 years of age);
- the student is missing;
- the student has medical concerns or severe depression or psychological issues which lead the School to fear for the student's wellbeing;
- the student has engaged or threatened to engage in behaviour that is reasonably believed to endanger the student or others;
- the student is at risk of committing a criminal offence; or
- the student is the subject of an investigation relating to criminal matters.

The use of extenuating circumstances by the School to suspend or cancel a student's enrolment before the completion of any complaints and grievances process will be supported by appropriate evidence.

The final decision for evaluating extenuating circumstances lies with the Principal.

## Seeking information from the Department of Home Affairs

Deferment, suspension and cancellation of enrolment can affect a student's visa as a result of changes to enrolment status. Students can visit the Department of Home Affairs website <https://www.homeaffairs.gov.au/> for further information about their visa conditions and obligations.



## ESOS Standard 10

# Complaints and appeals

The School is committed to fair and transparent resolution of any concerns, complaints or appeals made by students. If a student is dissatisfied with a decision or action taken by the School, for example a decision to report a student for not meeting course progress or attendance requirements, they have the right to access the School's [Complaints and Grievances Policy and Procedure](#).

This process allows students to raise a concern or appeal any decision that affects their enrolment or visa, including, but not limited to:

- deferral, suspension or cancellation of enrolment;
- unsatisfactory academic progress or attendance;
- behavioural or disciplinary decisions made by the School; or
- concerns about the quality of teaching, facilities or services.

Students must lodge their complaint or appeal in writing within 20 working days of receiving notice of the decision.

The School will not report students to the Department of Home Affairs or take any final action until a complaints and grievances process is completed. Students will receive written acknowledgement of their complaint or appeal, and the outcome will be communicated in writing, with reasons provided.

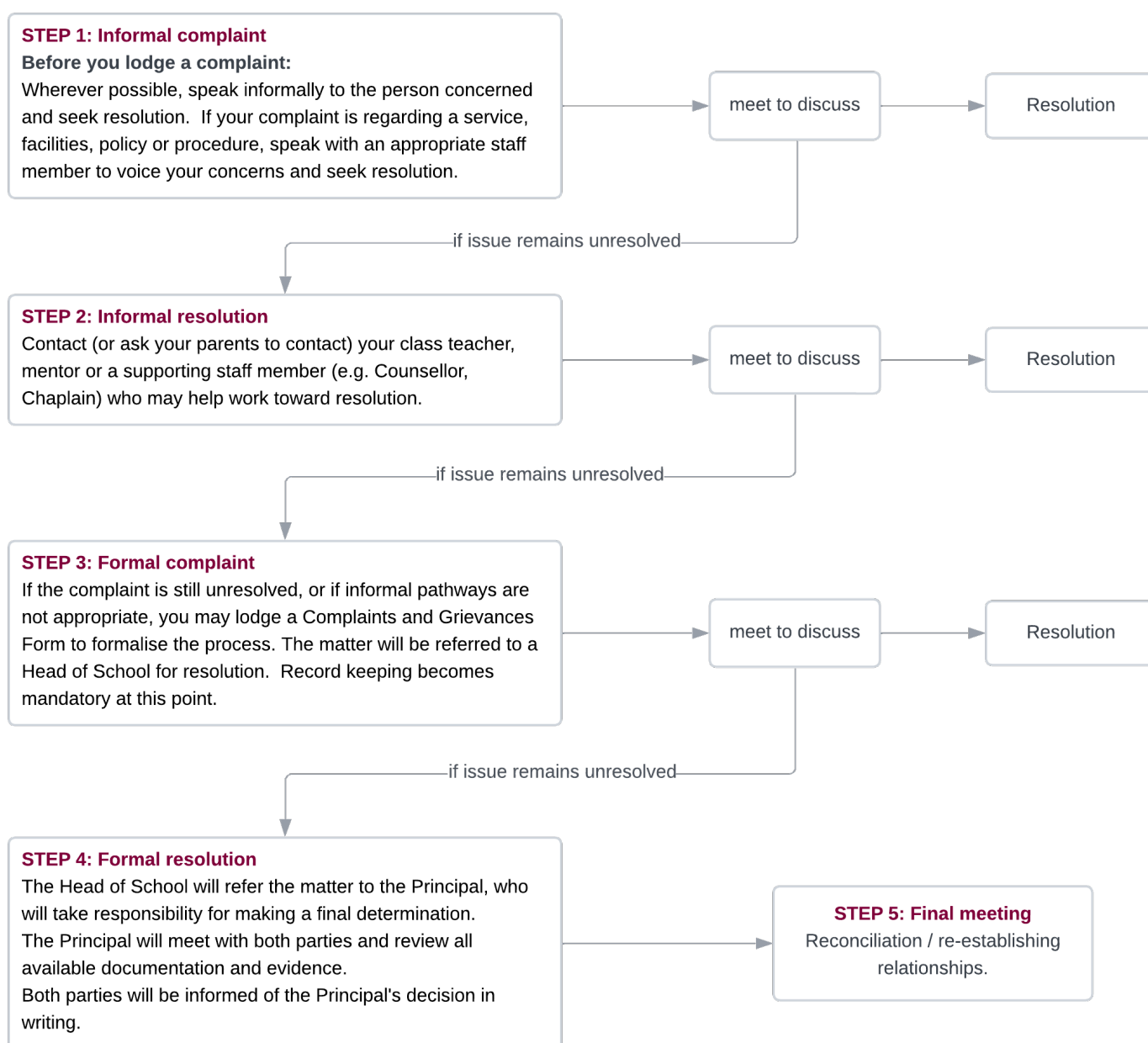
If a student is not satisfied with the outcome of the School's internal complaints and grievances process, they may choose to lodge a complaint with an external, independent body.

For overseas students, the relevant body is the Overseas Students Ombudsman, which investigates complaints about problems that overseas students have with private education and training providers in Australia. This service is free, impartial and independent of the School. Further information about how to contact the Ombudsman is available at [www.ombudsman.gov.au](http://www.ombudsman.gov.au).

Students may also request support from the School in understanding this process or preparing relevant documentation. The availability of external complaints handling is in addition to the School's internal review process and ensures that students have access to a fair and transparent resolution pathway.

Where a decision or recommendation is made in favour of an overseas student, whether through the School's internal complaints and appeals process or an external body such as the Overseas Students Ombudsman, the School will immediately implement the outcome, including any corrective or preventative actions required and will promptly advise the student of the steps taken.

The flowchart for the complaints and grievances process is replicated here, along with the key provisions for overseas students. For further information, please refer to the full document.





## ESOS Standard 11

# Additional registration requirements

The School is committed to ensuring compliance with regulatory requirements concerning changes in ownership, high managerial agents or legal entity status. As such, the following controls apply:

### Staffing, resources and capacity for course delivery

The School ensures that all courses delivered to overseas students, whether directly or through an approved partner, are supported by adequate staff, educational resources, facilities, equipment and access to learning and library materials appropriate to the course level and discipline. The number of overseas students enrolled in each sub-school is managed to ensure that staffing levels, infrastructure and learning resources remain sufficient to maintain a high standard of delivery and student support.

### Notifications of changes to government agencies

The School will promptly notify all relevant government authorities in writing of any upcoming changes in ownership or legal entity status. Notifications will occur as soon as we are certain the changes will take effect and, wherever possible, prior to their implementation.

In instances where changes to high managerial agents are anticipated, notification will similarly be made in advance. Where prior notice is unfeasible, the School will notify relevant authorities within 10 working days post-change.

### Provision of information on new owners or high managerial agents

To facilitate an assessment under Section 9 of the ESOS Act, the School will provide all necessary information regarding new owners or high managerial agents to the designated authority.

### Definition and responsibilities of high managerial agents

High managerial agents bear significant responsibilities, including:

- overseeing senior level operations within the institution;
- determining, approving and guiding the execution of policies related to international students;
- making key business decisions regarding international education programs;
- representing the institution publicly with authority to sign high-level agreements; and
- steering the institution's direction in international education activities.

## Fit and proper test for new high managerial agents/owners

All newly appointed high managerial agents, owners or Principal Executive Officers (PEOs) are required to complete the “fit and proper” assessment as prescribed. Completed documentation will be submitted to the designated authorities.

## Student refunds and documentation in cases of legal entity changes

If a change in legal entity status occurs, the School will extend a written offer of a refund to all enrolled students, ensuring they have the option to either accept the refund or formally agree to continue their studies under the revised entity. All records of student decisions will be retained in student files.