

Institution	Universal English
Policy Name	Younger Students (Under 18) Policy and Procedure

1. Scope

This Policy applies to students under the age of 18 years who participate in Universal English (UE)'s junior programs such as study tours and summer camps, where students typically enter Australia on tourist or other non-student visas. It also applies to UE staff and visitors to the extent that their activities involve contact with these students.

2. Purpose

UE is committed to ensuring that all students under the age of 18 who participate in its programs are provided with appropriate welfare, supervision, and support in accordance with applicable Australian regulations. While these students are not subject to the ESOS Act or the National Code, UE upholds its duty of care and responsibilities to ensure a safe, inclusive, and supportive environment for all under-18 students, in line with the *Child Safe Standards Victoria*.

3. Regulatory Alignment

Students holding tourist or other non-student visas are not classified as "overseas students" under the ESOS Act 2000. Therefore, Universal English (UE) is not legally required to comply with the welfare and custody provisions established by the Department of Home Affairs or the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

This Policy is instead developed and implemented in alignment with the Child Safe Standards Victoria, which govern the safety, supervision, and wellbeing of all individuals under the age of 18 in education and care environments.

4. Definitions

Excursion: An off-campus, UE-organised activity involving U18 students that requires supervision and prior risk assessment.

Homestay Provider: An individual or family that hosts a U18 student in their home as part of an approved accommodation arrangement. All adults in the household must hold a valid Working With Children Check (WWCC).

Photography and Video Consent: Written permission required from both the student and their parent/guardian before any images or video footage of U18 students are captured or shared.

U18 Student: A student who is under the age of 18 at the time of enrolment or participation in a Universal English (UE) junior program.

Working With Children Check (WWCC): A screening process required by law in Victoria for adults engaged in child-related work, including staff, homestay providers, and any individuals living with a U18 student.

5. Policy

- 5.1 UE ensures that all students under the age of 18 are appropriately supervised during scheduled educational and recreational activities that are organised by the institution. This includes supervision during classes, excursions, and approved extracurricular programs.
- 5.2 UE does not provide supervision during students' personal or unscheduled travel outside of program activities; however, students are provided with guidance on safe conduct and travel practices. Where additional support is necessary, UE will implement reasonable measures to maintain student safety in accordance with the Child Safe Standards. Staffing ratios for off-site events are determined through risk assessments.
- 5.3 UE retains overall responsibility for the welfare of students under the age of 18, regardless of whether the accommodation is arranged directly by UE or through an approved homestay agency. This responsibility includes ensuring that all accommodation arrangements meet UE's standards for safety, suitability, and student wellbeing.
- 5.4 Before a student is placed, all homestay accommodation must be inspected and approved either by UE or its approved agency. The host family must also be interviewed to assess their suitability, including their understanding of responsibilities relating to the care, supervision, and discipline of minors.
- 5.5 The assessment process must verify that the sleeping, living, and study conditions are appropriate for a student under 18, and that the homestay environment is culturally sensitive and supportive. UE may conduct its own inspections even when a third-party agency has carried them out. Records of all inspections, interviews, and approvals must be properly documented and retained.
- 5.6 Students under 18 are required to comply with UE's Student Code of Conduct Policy at all times, both during on-campus and off-campus activities. Homestay providers are made aware of the behavioural expectations set out in the Policy and are supported in their role to uphold them in the home environment.
- 5.7 All people living in the homestay at the same time as the Under 18 (U18) student must show a current Working With Children Check (WWCC) card; this should be kept current during the period that the U18 student is staying in the accommodation.
- 5.8 UE is committed to preventing and responding to child abuse or harm by fostering a proactive child safety culture. All staff must immediately report any concerns regarding a student's wellbeing, including suspected changes in accommodation or inappropriate conduct.
- 5.9 Concerns are escalated to the Junior Program Operations Manager and recorded. UE also maintains risk assessments for off-campus activities and ensures that risk relating to under-18 student welfare is captured in the institution's Risk Management Framework and Risk Register, monitored by the ULG Board of Directors.

- 5.10 All staff engaged with students under 18 must hold a current Working With Children Checks (WWCC) as a condition of employment. UE ensures that these staff are regularly trained in identifying and responding to risks of harm, abuse, or neglect and are equipped with up-to-date knowledge of child safety requirements and best practices.
- 5.11 UE actively encourages all students under 18 to express their views on matters that affect them. Students are provided with clear, age-appropriate information about how to raise concerns, make complaints, or report if they feel unsafe. Students are also encouraged to speak with staff about any issues with homestay arrangements, even if they believe the issue is minor.
- 5.12 UE maintains clear and timely communication with parents and guardians, ensuring they are aware of available support services, health and safety arrangements, and procedures to follow in emergencies. A 24/7 emergency contact is provided, and staff are trained to respond effectively to welfare-related incidents involving U18 students.
- 5.13 Staff are instructed to avoid capturing images or video footage of U18 students unless written consent is obtained from both the student and their parent or guardian. Consent must be documented and stored in the student's file, and any visual materials must be handled in accordance with privacy and safety guidelines.

6. Procedure

- 6.1 Where accommodation for U18 students is arranged through an approved homestay agency, UE must ensure the agency is reputable, experienced with under-18 placements, and has documented policies and procedures that meet the Child Safe Standards.
- 6.2 All documentation received from the agency must be reviewed by the Junior Program Operations Manager and securely filed by UE.
- 6.3 UE must ensure the agency provides all homestay providers with a briefing outlining:
 - a. Their responsibilities regarding student supervision and welfare;
 - b. Emergency and incident reporting contacts (UE and agency);
 - c. Key expectations regarding student conduct and house rules; and
 - d. A copy or summary of the UE Student Code of Conduct.
- 6.4 The agency must confirm in writing that this information has been provided to each homestay prior to student placement. UE may request evidence of agency training materials or provider briefing records during audits or quality assurance checks.
- 6.5 If a UE staff member, homestay provider, or student raises a concern about a student's wellbeing, accommodation, or conduct, this must be reported to the Junior Program Operations Manager .

- 6.6 The Operations Manager (or delegate) must follow up with the student and relevant parties and document the outcome. A record of all complaints, concerns, and resolutions must be maintained securely in the student file.
- 6.7 All U18 students and their guardians must be provided with a 24/7 emergency contact number.
- 6.8 UE staff must be trained in emergency response procedures and first aid protocols relevant to U18 students. In the event of a health or safety emergency, the Junior Program Operations Manager or relevant staff member must immediately notify the parent/guardian and escalate the matter to UE management.
- 6.9 Written consent from both the student and their parent/guardian is required for any photography, video, or public use of student images. Consent forms must be filed in the student's records and reviewed prior to any publication. Staff must avoid collecting or sharing identifiable images of U18 students without consent.
- 6.10 UE must ensure parents/guardians are informed of their child's arrival, accommodation details, and access to support services. If there are any changes in a student's wellbeing, behaviour, or accommodation, UE will contact the parent/guardian in a timely and respectful manner. Interpreting services may be used where necessary to ensure clear communication with non-English-speaking families.

Version History

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this policy.

Responsible Officer	Managing Director		
Implementation Officers	Academic Manager		
Review Date	14 August 2028		
Approved by			
Managing Director			
Associated Documents			
Critical Incident Policy and Procedure			
Health and Safety Policy and Procedure			
Privacy Policy and Procedure			
Student Code of Conduct Policy			
Student Complaints and Appeals Policy and Procedure			
Version	Brief Description of the changes	Date Approved	Effective Date
1.0	• First Iteration	14 August 2025	14 August 2025