



*Scotch College Adelaide*  
*CRICOS Provider Code: 00615B*

# **SCHOOL HANDBOOK CRICOS REGISTRATION POLICIES & PROCEDURES**

Copies are available electronically, from the Enrolments Office or from the Scotch College website

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## CRICOS - Responsibilities and Code of Practice

### References:

[Education Services for Overseas Students \(ESOS\) Act 2000: National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

[ESOS \(Registration Charges\) Act 1997:](#)

[ESOS \(TPS Levies\) Act 2012:](#)

Scotch College Adelaide is bound by the National Code of Practice for Providers of Education and Training to Overseas Students 2018 under its registration on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS).

In order to be registered on CRICOS Scotch College Adelaide is required to:

- have the principal purpose of providing education; and
- clearly demonstrate capacity to provide education of a satisfactory standard.

As a registered provider of courses for International students, Scotch College Adelaide is bound by the code of ethics that is overseen by the Ministerial Council for Education, Early Childhood Development and Youth Affairs (MCEECDYA). The National Code of Practice for Registration Authorities and Providers of Education and Training to International Students (referred to as The National Code) is available upon request from the College.

#### Courses at Scotch College Adelaide

Provider Code	Organisation Name	Course Code	Course Name	Course Status
00615B	Scotch College	096628C	Primary Studies Years Reception – Year 6	Registered
00615B	Scotch College	096629B	Secondary Junior Year 7 – Year 10	Registered
00615B	Scotch College	096630J	Secondary Senior Years 11 & 12	Registered

Scotch College Adelaide is registered to enrol a maximum of 60 full fee paying 500 visa subclass students.

N.B. Calculations regarding capacity should include Confirmations of Enrolment (CoEs) for current students as well as approved and visa granted CoEs for future students.

The Principal Executive Officer (PEO) is:

<i>Trent Driver</i>	<i>Principal</i>
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The PRISMS administrator is:

<i>Carrie Cousar</i>	<i>Director of Admissions</i>
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## CRICOS Registration Legislation and Regulatory Requirements

Act/Section	Description	Link
NC D	National Code of Practice for Providers of Education and Training to Overseas Students 2018	<a href="#">link</a>
ESOS Act 2000	Education Services for Overseas Students (ESOS) Act 2000	<a href="#">link</a>
ESOS (Reg Charges) Act 1997	Education Services for Overseas Students (Registration Charges) Act 1997	<a href="#">link</a>
ESOS (TPS Levies) Act 2012	The Education Services for Overseas Students (TPS Levies) Act 2012	<a href="#">link</a>
ESOS Reg 2001	Education Services for Overseas Students Regulations 2001	<a href="#">link</a>
ESOS Act 2000 s46D(7) & s47E(4)	Education Services for Overseas Students (Calculation of Refund) Specification 2014	<a href="#">link</a>
ESOS Act 2000 s46B	Education Services for Overseas Students (Notifying provider default - requirements for a notice) Determination 2012 (No. 1)	<a href="#">link</a>
ESOS Act 2000 s46F	Education Services for Overseas Students (Provider default - discharge of obligations - requirements for a notice) Determination 2012 (No. 1)	<a href="#">link</a>
ESOS Act 2000 s50D	Education Services for Overseas Students (TPS Director to notify Immigration Secretary of payment of refunds) Determination 2012 (No. 1)	<a href="#">link</a>

## PRISMS

There are three different levels of access to the Provider Registration and Overseas Student Management System (PRISMS).

New PRISMS users must complete an online training course before being allowed access.

News alerts for changes to PRISMS can be found on the PRISMS home page or in the PRISMS [Provider User Guide](#).

PRISMS should be checked regularly for alerts relating actions required for Confirmations of Enrolments (CoEs), as these will not be seen until logged in.

The following staff members have access to PRISMS:

*Carrie Cousar*

*PRISMS Administrator*

It is the responsibility of the following officer to notify the International Quality Unit (CRICOS) and all overseas students enrolled of any intention to relocate premises at least 3 months before the relocation:

*Trent Driver*

*PEO*

The Director of Admissions will ensure that the ESOS Agency for the registered provider approves, and has up-to-date information on, specific aspects of the registered provider's operations and any registered course.

In applying to register a full-time course at a location, Scotch College will seek approval from the ESOS agency, including through the relevant designated State authority, for the following:

- the course duration, including holiday breaks
- modes of study, including online, distance or work-based training
- number of overseas students enrolled at the provider, within the limit or maximum number approved by the ESOS agency for each location
- arrangements with other education providers, including partners, in delivering a course or courses to overseas students.

In seeking approval under section 11 of the National Code 2018, Scotch College must demonstrate any matters requested by the ESOS agency, including through the designated State authority, which may include the following:

- the expected duration of the course does not exceed the time required to complete the course on the basis of full-time study – for VET courses, this is a minimum of 20 scheduled course contact hours per week unless specified by an accrediting authority
- the expected duration of the course includes any holiday periods or any work-based training
- any work-based training to be undertaken as part of the course is necessary for the student to gain the qualification and there are appropriate arrangements for the supervision and assessment of students
- the course is not to be delivered entirely by online or distance learning
- the provider and any partner they engage to deliver a course or courses to overseas students has adequate staff and education resources, including facilities, equipment, learning and library resources and premises as are needed to deliver the course to the overseas students enrolled with the provider
- the maximum number of overseas students proposed by the provider for the location reflects the appropriateness of the staff, resources and facilities for the delivery of the course.

Scotch College must submit to its ESOS agency for approval, including through the relevant designated State Authority, information on any proposed changes to their registration, for a course as outlined in standard 11.1, at least 30 days prior to the time at which those changes are proposed to take effect.

## Change of Ownership/High Managerial Agent

It is the responsibility of the Director of Admissions to advise the International Quality Unit (CRICOS) as soon as practical in writing of:

- Any prospective changes to the ownership of the College as soon as practicable prior to the change taking effect, and
- Any prospective or actual change to a “High Managerial Agent” of the College soon as practicable prior to the change taking effect, or within 10 working days where the change cannot be determined until it takes effect, and
- Any information on the new owner or high managerial agent, demonstrating they are a ‘fit and proper’ person.

Definitions:

*‘High Managerial Agent’* is someone responsible for:

- The operations of the institution at a senior level
- Determining, approving and overseeing the implementation of high level policies in relation to FFPOS
- Making business decisions relating to the FFPOS programme
- Representing the institution, with the authority to speak on behalf of the institution and to sign high level agreements on the institution’s behalf
- Setting the direction of the institution in relation to international education activities.

For further information about the National Code of Practice for Providers of Education and Training to Overseas Students 2018, [please click here](#).

## Student Contact Officer

[Reference: National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

The following staff member is the designated official point of contact for overseas students:	
<i>International Student Coordinator</i>	<i>internationals@scotch.sa.edu.au</i>
These staff members undertake the following roles and responsibilities in relation to overseas students:	
<b>Staff Member in this Role</b>	<b>Area of Responsibility for Overseas Students</b>
International Student Coordinator	Orientation on arrival
EAL/D Teacher	EAL/D support
Heads of House	Other tutorial support
Careers Counsellor	Academic and careers counselling
College Psychologist	Personal counselling
International Student Coordinator	Monitoring of homestay/accommodation/care arrangements
Head of Torrens Park Campus	Complaints and appeals
Director of Admissions	Visa/passport issues
Director of Admissions	Overseas Student Health Cover (OSHC)
<p>Information about the roles of support services and staff in the School, including how to access services, is given to students via:</p> <ul style="list-style-type: none"> <li>• <a href="#">International Student Handbook</a></li> <li>• <a href="#">International Student Orientation Program</a></li> </ul>	
The following staff member is responsible for keeping details in Section 1 and on the CRICOS website up to date:	
<i>Carrie Cousar</i>	<i>Director of Admissions</i>
Information in this section should be checked and updated whenever there is a change of staff member in the roles above.	



## Marketing information and practices

### References: National Code of Practice for Providers of Education and Training to Overseas Students 2018

Scotch College Adelaide markets its education and training services ethically and in a professional manner to maintain the integrity and reputation of the international education industry.

Scotch College Adelaide's marketing materials do not make false claims or provide misleading information about itself, its courses or course outcomes, including:

- Claims of associations between providers
- Employment outcomes associated with a course
- Automatic acceptance into another course
- Possible migration outcomes
- Guarantee a successful education assessment outcome for the student

Scotch College Adelaide will not actively seek to recruit a student who is already enrolled with another registered provider.

Scotch College Adelaide will assess any enrolment enquiry from a student already enrolled with another registered provider according to the requirements of [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#). For further information regarding transferring to another education provider, please click [here](#) to Standard 7.

The College's Legal Entity Name and CRICOS Number appear on all School written marketing and other required materials, as below, including in electronic form, as required by the 2018 National Code in the following format:

**Scotch College Adelaide**  
**CRICOS No: 00165B**

Offers of enrolment can only be made for registered courses that are listed on PRISMS.

At this College:

- A study period is 2 terms
- A semester is 20 weeks

Marketing information is provided to students prior to enrolment and is provided in the following ways:

- Admissions office, prospectus pack
- College website: <http://www.scotch.sa.edu.au/>

Information in this section should be checked and updated whenever there is a change of information in the Checklist, e.g., a change in course registration, in regulations relating to information in the checklist, or when new marketing materials are produced.

<b>MARKETING MATERIALS WERE LAST REVIEWED AND UPDATED BY</b>	<b>Carrie Cousar</b>	<b>on 24/05/2022</b>
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## Checklist for Marketing information and practices

References: [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

Under marketing information and practices, Registered Provider Name (legal entity name as registered on CRICOS) and CRICOS Code are provided on:

- school website
- written marketing materials (printed and electronic)
- any other materials listed below

The following information is provided to a student prior to enrolment:

REQUIREMENT	INFORMATION GIVEN
<b>Requirements for acceptance into a course</b>	<ul style="list-style-type: none"> <li>• Minimum level of English language proficiency</li> <li>• Educational qualifications</li> <li>• Advice as to whether course credit is applicable</li> </ul>
<b>Course information</b>	<ul style="list-style-type: none"> <li>• Course content and duration</li> <li>• Qualification/exit statement offered</li> <li>• Modes of study</li> <li>• Assessment methods</li> </ul>
<b>Campus Information</b>	<ul style="list-style-type: none"> <li>• Campus location(s)</li> <li>• General description of facilities, equipment, learning and library resources available to students</li> </ul>
<b>Arrangements with other providers</b>	<ul style="list-style-type: none"> <li>• Details of any arrangements with another provider to provide the course or part of the course</li> </ul>
<b>Fees Information</b>	<ul style="list-style-type: none"> <li>• Indicative course-related fees</li> <li>• Advice for the potential for fees to change during the student's course</li> <li>• Applicable refund policies including refund provisions in the case of a written agreement, visa refusal and student or provider default</li> </ul>

<b>Grounds on which a student's enrolment may be deferred, suspended or cancelled</b>	<ul style="list-style-type: none"> <li>• Deferment, suspension and cancellation policy</li> <li>• Behavioural policy/Code of Conduct</li> <li>• Information regarding 'exclusion from class' if applicable</li> </ul>
<b>Description of the ESOS framework</b>	<ul style="list-style-type: none"> <li>• Description of the <a href="#">ESOS framework</a></li> <li>• Tuition protection information for students</li> </ul>
<b>Relevant information on living in Australia</b>	<ul style="list-style-type: none"> <li>• Indicative costs of living</li> <li>• Accommodation options</li> <li>• Where relevant, schooling obligations and options for dependants, including possibility of school fees</li> </ul>
<b>Complaints and appeals process</b>	<ul style="list-style-type: none"> <li>• Provided to students prior to enrolment</li> <li>• Provided to students again during orientation</li> <li>• <a href="#">Scotch College Grievance Policy</a></li> <li>• External Grievance Policy providing contact details for <a href="#">Overseas Students Ombudsman</a>.</li> </ul>
<b>Welfare and accommodation arrangements</b>	<ul style="list-style-type: none"> <li>• Condition for under 18 year old students to maintain adequate welfare and accommodation arrangements</li> <li>• <i>[If school is issuing the CAAW]</i> Advice to under 18 year old students not to travel to Australia before start date of CAAW arrangements</li> </ul>
<b>Student transfer request assessment policy</b>	<ul style="list-style-type: none"> <li>• Policy must be available to staff and students at orientation</li> </ul>
<b>Course progress and attendance policy</b>	<ul style="list-style-type: none"> <li>• Documented course progress policy and intervention strategy must be available to staff and students at orientation</li> <li>• Documented attendance policy and procedures must be available to staff and students at orientation</li> </ul>

THIS CHECKLIST WAS LAST UPDATED BY **Carrie Cousar** on **24/05/2022**

## Entry Requirements for Full Fee Paying Overseas Students (FFPOS)

1. Scotch College Adelaide will consider enrolment applications from students wishing to apply for a Student Visa, subject to compliance with minimum requirements and conditions set by the College and with legislative requirements of South Australia and the Commonwealth of Australia, including any requirements to undertake extra tuition to learn English to meet the English language proficiency standard needed to enter mainstream classes.
2. Applications for enrolment must be made by filling out an Application for Admission Form. This must be correctly completed, and must be accompanied by the following documents to support the application:
  - Copies of Student Reports from the previous 2 years of study, including a copy of the current or latest Student Report;
  - A completed Reference Form from the student's current or most recent school Principal is also required if student reports do not record student behaviour or commitment to studies;
  - A completed Subject Choices Form if appropriate;
  - Appropriate proof of identity and age;
  - Written evidence of proficiency in English as a second language: AEAS /IELTS or equivalent
  - Photocopy or scanned copy of passport page with name, photo identification, passport number and expiry date
  - Application for Course Credit where applicable.
3. Where the above documents are not in English, certified translations in English are required, with necessary costs to be met by the applicant.
4. An application for enrolment can only be processed when all of the required forms have been received by the Director Admissions.
5. Applications from overseas students are processed according to established procedures, and are dealt with on their merits.
6. Assessment procedures include an evaluation of reports from previous schools and of English language proficiency. In cases where report cards are not available or are inconclusive for any reason, the College may require relevant testing of the applicant to assess the application.
7. Procedures are to be reviewed annually by the Director of Admissions.
8. Understanding a local guardian needs to be appointed, as per Scotch College Adelaide's International Enrolment Agreement.

## Minimum Academic and English Language Requirements

### Academic Requirements

Students must provide evidence of satisfactory academic performance appropriate to entry to the year level requested on the Application for Enrolment or offered as an alternative point of entry by the school in a Letter of Offer.

#### For Primary School:

Evidence of application to school work and age-appropriate achievement in literacy and numeracy areas of the curriculum.

#### For Year 7-12 Students:

A pass level or 'B' grade or better for the majority of core subjects.

### English Language Proficiency Requirements

Scotch College Adelaide requires evidence of sufficient proficiency in English to successfully meet the curriculum demands of the enrolled course. This is a requirement under the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

Scotch College Adelaide assesses evidence of English language proficiency presented by a student at the time of application.

Scotch College Adelaide requires results from AEAS /IELTS or EPET. For direct entry the following guidelines are acceptable:

Year Group	AEAS	IELTS
Year 7 (Middle School)	<b>71 or above</b>	<b>5 or above</b>
Year 8 (Middle School)	<b>71 or above</b>	<b>5 or above</b>
Year 9 (Middle School)	<b>71 or above</b>	<b>5 or above</b>
Year 10 (Senior School)	<b>80 or above</b>	<b>6 or above</b>
Year 11 (Senior School)	<b>80 or above</b>	<b>6 or above</b>

International students applying to Scotch College must sit the AEAS/IELTS or equivalent.

*\*Students who have undertaken the English for Academic Purposes Language Assessment may use the results of this assessment to demonstrate English proficiency if they demonstrate achievement against the 'Developing' or Consolidating' criteria, and after they have demonstrated proficiency in an interview.*

Students should note that if their language proficiency is below that outlined above, they may be required to undertake an intensive English language course before beginning mainstream studies. Depending on their AEAS/IELTS or equivalent score, students may be offered a place in the Scotch CLIP class or may need to attend external English language courses.

Any exception to the above has to be recommended by Director of Admissions and approved by the Head of School.

#### Definitions:

AEAS – [Australian Education Assessment Services](#)

IELTS - International English Language Testing System

CLIP – Culture and Language Immersion Program

## Course Credit Policy (SACE)

If a student has completed a full Australian or overseas senior secondary program that is considered the equivalent of Stage 1, they may be granted up to 110 SACE credits at Stage 1.

As per current SACE guidelines a student can be granted 70 credits plus:

- 20 credits for meeting the literacy requirement
- 10 credits for meeting the numeracy requirement
- 10 credits against the compulsory Stage 1 Personal Learning Plan

Students who enrol during Year 11 (Stage 1) may apply for some Stage 1 credits. The equivalent of one semester of Stage 1 study will be granted a maximum of 50 credits at Stage 1.

Overseas students who begin their Stage 1 studies in Semester 2, or who undertake Stage 2 only, will be granted recognition against the Personal Learning Plan.

The SACE Coordinator will apply for course credits on the SACE Application form.

The Director of Teaching and Learning is responsible for reviewing and updating the College's policy and statement about course credit.

Information in this section should be checked and updated annually, if there is a demand for course credit demonstrated in student applications and in response to any relevant changes in legislation.

### Recognition of Prior Learning

Scotch College Adelaide follows the SACE Board instruction around recognition of prior learning for students studying the SACE. Details of this can be obtained directly from the SACE Board website, accessible at:

<https://www.sace.sa.edu.au/studying/recognised-learning>

Any Vocational Education or External courses undertaken prior to the enrolment in the SACE program, that are able to be contributed to achievement of the SACE, will be recognised using the SACE RPL processes.

If RPL or course credit is granted to an overseas student, the College will provide a written record of the decision to the overseas student. This written record will be provided for up to 2 years after the student ceases to be an accepted student.

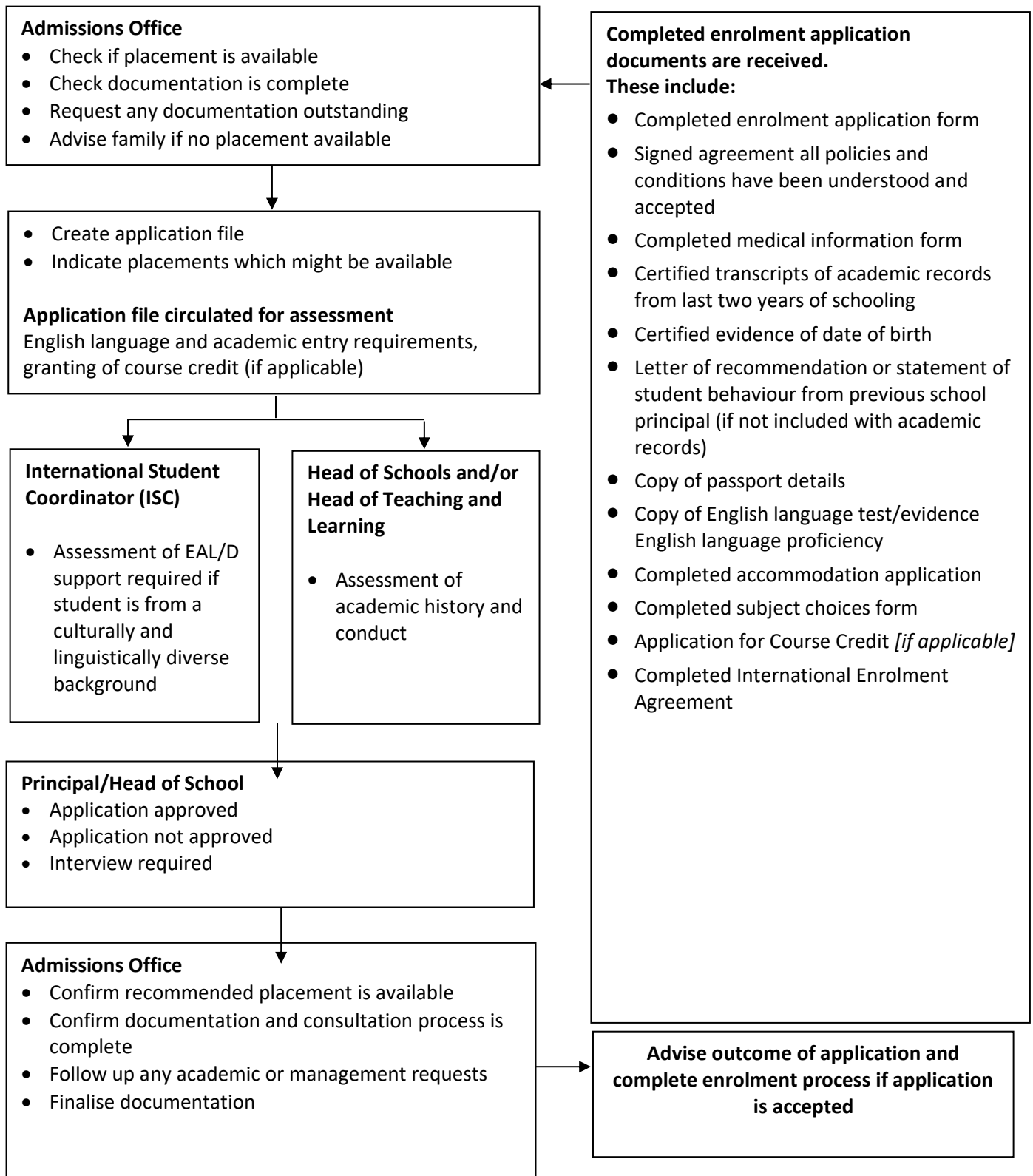
If the College grants the overseas student RPL or course credit that reduces the overseas student's course length, the College will inform the student of the reduced course duration, and the COE will be amended for the reduced duration of the course.

The College will also change the course duration in PRISMS if RPL or course credit is granted after the overseas student's visa is granted.

For students in Reception to pre-SACE programs, a copy of a school report or transcript from the current or previous year of schooling will be accepted as evidence of prior learning.

## Procedure for assessing student's qualifications and language proficiency process

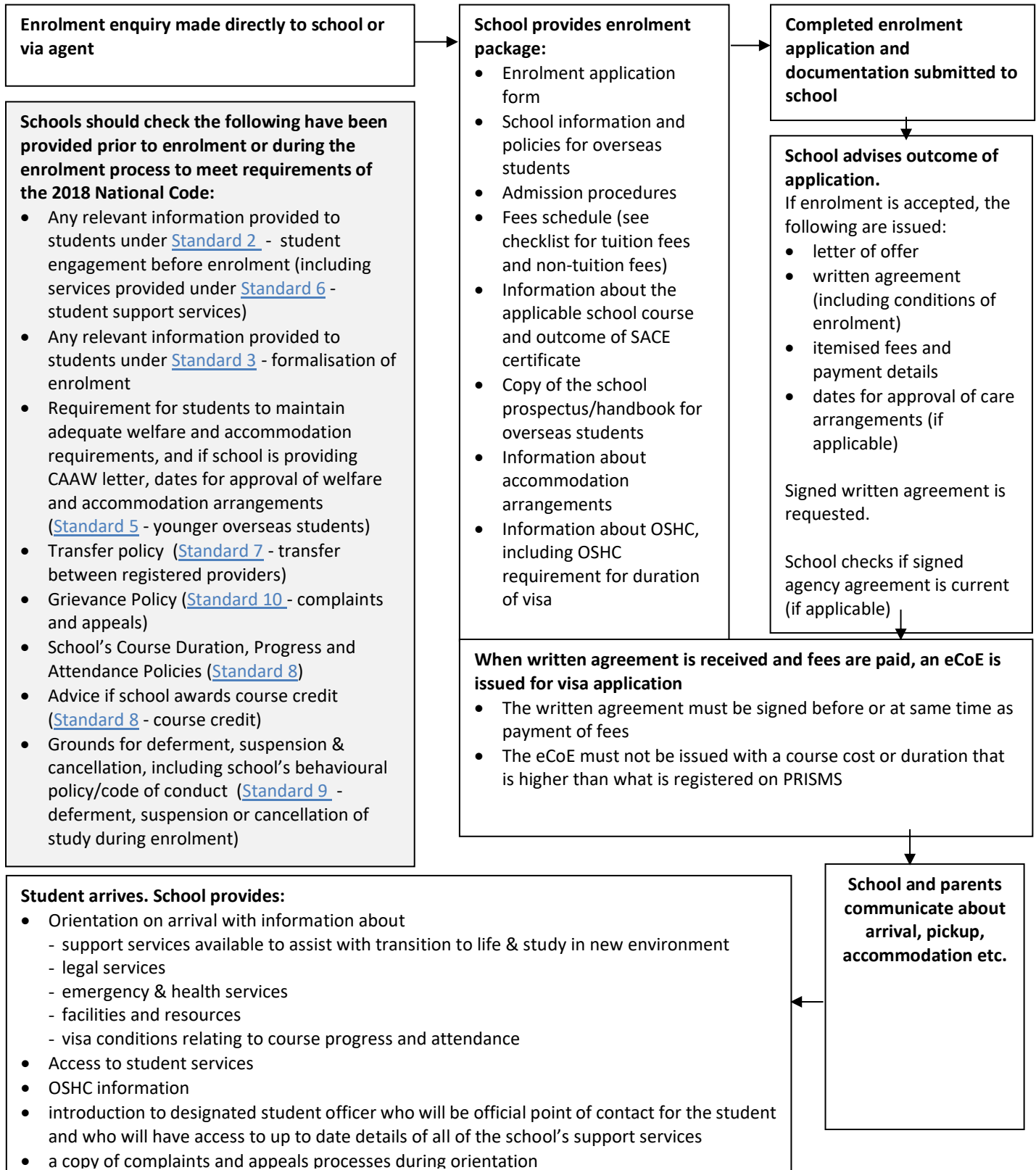
References: National Code of Practice for Providers of Education and Training to Overseas Students 2018





## Enrolment Procedure Overview Enrolment Procedure Overview

References: [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)





## Enrolment Procedure Checklist

References: [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

ACTION	PROCESS
<b>Respond to enquiry</b>	<ul style="list-style-type: none"> <li>Request further details</li> <li>Clarify any special requirements or conditions of enrolment, e.g., additional English language tuition such as CLIP class</li> <li>Clarify if already attending a school in Australia.</li> </ul>
<b>Initial check of school capacity</b>	<ul style="list-style-type: none"> <li>Check capacity for placement specific year levels if DOB or year level is known</li> <li>Check current numbers of FFPOS</li> </ul>
<b>Provide enrolment information and application package to parent/agent</b>	<ul style="list-style-type: none"> <li>Application form</li> <li>Prospectus</li> <li>Student handbook/information</li> <li>Subject selection information</li> <li>Enrolment process</li> <li>Policies and school information</li> <li>Fees information</li> <li>Accommodation</li> <li>OSHC</li> <li>Uniforms</li> </ul>
<b>If using an agent</b>	<ul style="list-style-type: none"> <li>Check agreement is current</li> <li>Check contact details for PRISMS records</li> <li>Check agent is on website</li> </ul>
<b>Record enquiry details</b>	<ul style="list-style-type: none"> <li>Date, contact details</li> <li>Follow up as necessary</li> </ul>
<b>On receipt of application</b>	<ul style="list-style-type: none"> <li>Check documentation is complete and follow up if necessary</li> <li>Create file and enter details in database</li> </ul>
<b>Check availability of placement</b>	<ul style="list-style-type: none"> <li>DOB, year level and we are not exceeding the maximum 50 students</li> <li>Student ratios (for Year 12, if applicable for visa school classification)</li> <li>Date of entry, length of time for visa application to be processed</li> <li>Any special support/subjects/activities requested</li> </ul>
<b>Assess application</b>	<ul style="list-style-type: none"> <li>Assess academic requirements according to entry requirements policy</li> <li>Assess English language proficiency according to entry requirements policy</li> <li>Assess welfare requirements (is CAAW needed)</li> <li>Confirm if placement is available</li> </ul>

<b>Advise parents/agent if application is unsuccessful</b>	<ul style="list-style-type: none"> <li>• Student does not meet entry requirements or no place available</li> <li>• Refund any fees owing</li> </ul>
<b>Create Letter of Offer and individualised written agreement if application is successful.</b>	<p>Must include Department of Home Affairs requirements:</p> <ul style="list-style-type: none"> <li>• Tuition costs</li> <li>• Course duration</li> <li>• Course description</li> <li>• Education provider code</li> <li>• Conditional offer of a place if applicable</li> </ul> <p>Also:</p> <ul style="list-style-type: none"> <li>• Written agreement to be signed</li> <li>• Information regarding payment of fees, including invoice</li> <li>• Information on how to progress the enrolment from this point</li> </ul>
<b>When offer of place is accepted</b>	<ul style="list-style-type: none"> <li>• Check written agreement and any attachments are complete and signed</li> <li>• Check fees have been paid (if applicable)</li> <li>• Check/complete OSHC arrangements</li> <li>• Confirm receipt of written agreement and fees</li> <li>• Create eCoE (and CAAW if applicable)</li> <li>• Check course cost or duration on eCoE is not greater than what is registered on PRISMS</li> <li>• Enter fees received in PRISMS</li> <li>• Forward eCoE to parents/agent for student visa application</li> <li>• Confirm welfare dates with parents/agent (If applicable)</li> </ul>
<b>When advice of visa grant is received</b>	<ul style="list-style-type: none"> <li>• Record details in database</li> <li>• Provide pre-arrival information</li> <li>• Confirm arrival time and pick up arrangements</li> <li>• Activate accommodation placement procedures</li> <li>• Ongoing liaison with family until arrival</li> </ul>
<b>Organise accommodation</b>	<ul style="list-style-type: none"> <li>• Provide boarding/homestay information</li> </ul>
<b>On arrival</b>	<ul style="list-style-type: none"> <li>• Check arrival arrangements</li> <li>• Confirm arrival with parents/check student has contacted parents</li> <li>• Confirm arrival with relevant school staff</li> <li>• Confirm course start date in PRISMS</li> </ul>
<b>Begin student orientation</b>	<ul style="list-style-type: none"> <li>• </li> </ul>
<b>Within 14 days of agreed commencement date</b>	<ul style="list-style-type: none"> <li>• Confirm course start date in PRISMS</li> </ul>
<b>ONGOING</b>	<ul style="list-style-type: none"> <li>• Run PRISMS reports every study period</li> <li>• Enter required information in PRISMS within required timelines</li> <li>• Confirm student contact details every 6 months</li> </ul>

**THIS CHECKLIST WAS LAST UPDATED BY** **Carrie Cousar** **on** **24/05/22**

## Refund Policy for Full Fee Paying Overseas Students (FFPOS)

1. This refund policy applies to all course monies paid to the College and includes any course monies paid to an education agent to be remitted to the College.
2. Fees for services paid to education agents by students (or parent(s)/legal guardian if the student is under 18) are not covered by this refund policy.
3. The entry fee is non-refundable.
4. Payment of course fees and refunds:
  - Tuition fees are payable 6 months in advance, boarding fees are payable 12 months in advance, homestay fees are payable in advance
  - All fees must be paid in Australian dollars
  - 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 duration of one full term following advice of that change
  - Refunds will be reimbursed in Australian dollars and the payment sent to the applicant's home country unless otherwise requested in writing
  - Refunds will be paid to the student or the person specified in the written agreement.
5. All notification of withdrawal from a course, or applications for refunds, must be made in writing and submitted to the Principal, as per the College's Enrolment Agreement Terms and Conditions.
6. Unsuccessful enrolment/visa rejection
  - The College will refund within 28 days all course monies (excluding entry fee) paid where the student produces evidence that the application made by the student for a student visa has been rejected by the Australian immigration authorities.
7. Student default:
  - Refunds for student default apply to tuition fees only
  - Tuition and entry fee are non-refundable. Other course monies will be refunded on a pro-rata basis proportional to the amount of time the student was studying in the course, except where a non-refundable payment on behalf of the student has been made
  - The College will refund within 28 days of the receipt of written notification of withdrawal by the student (or parent(s)/legal guardian if the student is under 18) tuition fees paid by or on behalf of the student in line with notification requirements of Clause 6 of "*College Fee Payment & Refund Policy*."
  - No refund of tuition fees will be made where a student's enrolment is cancelled for any of the following reasons:
    - i. Failure to maintain satisfactory course progress (visa condition 8202)
    - ii. Failure to maintain satisfactory attendance (visa condition 8202)
    - iii. Failure to maintain approved welfare and accommodation arrangements (visa condition 8532) [if applicable]
    - iv. Failure to pay course fees
    - v. Any behaviour identified as resulting in enrolment cancellation in Scotch College Adelaide's Behaviour Policy/Code of Conduct or in other breach of policy

8. School Default:

- If for any reason the College is unable to offer a course, a full refund of fees (boarding and/or tuition) paid will be made within 14 days of notification of course cancellation
- If for any reason the College is unable to continue offering a course after commencement, a full refund of fees paid, including for the portion of the course already taught will be made within 14 days of notification of course cancellation.

9. This written agreement, and the right to make complaints and seek appeals of decisions and action under various processes, does not affect the rights of the student to take action under the Australian Consumer Law if the Australian Consumer Law applies.

Definitions:

*'Course money'* - includes tuition fees, any amount received by the College for Overseas Student Health Cover (OSHC) and any other amount the student has to pay in order to undertake the course.

*'Student Default'* – where a student does not start a course or withdraws from a course. Also, if the provider of the course refuses to provide or continue providing the course to the student as a result of failure to pay the provider an amount for which they are liable, the student breached a condition of their student visa or misbehaviour by the student, as defined in section 27(2) of the ESOS Act.

*'Course'* - PRISMS provider course code for a full one year.

## Fees, Refunds and TPS Obligations

### References:

[National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

[ESOS Act](#)

[ESOS Regulations](#)

[PRISMS Provider User Guide](#)

[Recent ESOS Changes FAQs](#)

[ESOS Amendment Act 2014](#)

Obligation
<p>Scotch College Adelaide collects fees in accordance with requirements under ESOS legislation</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Having a written agreement with a student or intending student that sets out the length of each study period and tuition fees for each study period for a student's course</li> <li>• Not receiving more than 50% of the student's total tuition fees for a course before the student has begun the course, and</li> </ul> <p>Once the student begins a course, not requiring any of the remaining tuition fees for the course to be paid more than 2 weeks before the beginning of the student's second study period for the course.</p>
<p><b>Providing information about fees for a course</b></p> <p>The Director of Admissions (<i>PRISMS Administrator</i>) is responsible for notifying the National ESOS Authority via PRISMS of the required information about the estimated totals of tuition fees and non-tuition fees payable by the student for the course.</p>
<p><b>Record keeping requirements in relation to fees</b></p> <p>Refer to overview and checklist of tuition fees and non-tuition fees, and Recent ESOS Changes FAQs for details about record keeping requirements in relation to fees.</p>
<p><b>PROVIDER DEFAULT</b></p> <p><b>1. Notification of provider default</b></p> <p>The Director of Admissions (the <i>PRISMS Administrator</i>) is responsible for notifying the National ESOS Authority and the TPS Director via PRISMS within 3 business days of the provider default occurring as required under s46B(2) of the ESOS Act.</p> <p><b>Requirements for a notice of provider default</b></p> <p>For subsection 46B(2), the provider must enter, for each CoE, the information below into the specified fields in PRISMS:</p> <ul style="list-style-type: none"> <li>• The date of the default</li> <li>• The reason for the default</li> <li>• The following contact details if known: <ul style="list-style-type: none"> <li>- Physical address</li> <li>- Email address</li> <li>- Home phone number and mobile phone number</li> </ul> </li> </ul>

## 2. Payment of refund

Scotch College Adelaide is responsible for administering refunds owing within 14 days after the default day of provider default (the provider obligation period).

## 3. Notification of outcome of provider default

The Director of Admissions (*PRISMS Administrator*) is responsible for notifying the National ESOS Authority and the TPS Director via PRISMS within 7 days after the end of the Provider Obligation Period as required under s46F of the ESOS Act.

### Requirements of a notice: provider default; discharge of provider obligations

For section 46F, the provider must enter, for each CoE, the information below into the specified fields in PRISMS:

- If the provider has not met their obligations in accordance with section 46D and the reasons for this
- If the provider has met their obligations in accordance with section 46D, whether this was under subsections (4) and (5) *Arranging alternative courses* or under subsections (6) and (7) *Providing a refund*
- If their obligations were met by arranging alternative courses:
  - the date the provider met their obligations
  - the CoE code of the alternative course accepted by the student (if known)
  - confirmation that the provider has evidence of the student's acceptance of an offer of a place in an alternative course
- If their obligations were met by providing a refund:
  - the amount of the refund
  - the date the refund was paid

## STUDENT DEFAULT

### 1. Notification of student default

The Director of Admissions (the *PRISMS Administrator*) is responsible for notifying the National ESOS Authority and the TPS Director via PRISMS of student default within 5 business days of the student default occurring as required under s47C of the ESOS Act.

### Requirements for a notice of student default

For subsection 47C (4) the provider must enter, for each CoE, the information below into the specified fields in PRISMS:

- the date of the default
- the reason for the default (if known)

### 2. Giving information about accepted students

The Director of Admissions (the *PRISMS Administrator*) is responsible for notifying National ESOS Authority via PRISMS within 14 days after the event specified below occurs:

- the student does not begin his or her course when expected
- any termination of an accepted student's studies (whether as a result of action by the student or the provider or otherwise) before the student's course is completed

For s19.1.f, see ESOS Regulations 2001, [Div. 3.1 Information and Records](#)

### 3. Payment of refund

Scotch College Adelaide is responsible for administering refunds owing within the stated timeframes:

- Within the provider obligation period of 4 weeks after receiving a written claim from the student for circumstances that are covered by the written agreement
- Within the provider obligation period of 4 weeks after the student default day if the student is refused a visa or if the written agreement is not valid.

### 4. Notification of outcome for student default

The Director of Admissions (the *PRISMS Administrator*) is responsible for notifying the National ESOS Authority and the TPS Director via PRISMS within 7 days after the end of the Provider Obligation Period as required under section 47H of the ESOS Act:

#### Requirements of a notice: student default; discharge of provider obligations

For section 47H, the provider must enter, for each CoE, the information below into the specified fields in PRISMS:

- If the provider has not met their obligation under the Act, the reasons for this
- If the provider has met their obligations under the Act and if so whether this was under 47D or 47E
- If their obligations were met in accordance with a claim under 47D(4)

#### (Refund under a written agreement about student default)

- (i) The date the student's claim was received.
- (ii) The amount claimed by the student.
- (iii) The amount paid by the provider.
- (iv) The date the refund was paid.
- (v) Whether or not the refund was paid in accordance with the written agreement between the provider and the student.

- If their obligations were met under 47E

#### (Refund in other cases)

- (i) The amount of the refund.
- (ii) The date of the refund.
- (iii) Confirmation that the refund amount was calculated in accordance with the Legislative Instrument made under section 47E (4).



## Checklist for tuition fees and non-tuition fees

ACTION/DEFINITION	PROCESS
<b>School documents distinguish between tuition fees and non-tuition fees</b>	<p>Examples:</p> <ul style="list-style-type: none"> <li>• Letters of Offer</li> <li>• Written Agreements</li> <li>• Fees Policies</li> <li>• Refund Policies</li> </ul>
<b>ESOS definitions</b>	Definitions or references to tuition fees and other fees in school documents align with ESOS definitions and requirements.
<b>Total amount of fees</b>	Letters of Offer and Written Agreements include the total amount of tuition fees and non-tuition fees for the entire course.
<b>CoEs</b>	<ul style="list-style-type: none"> <li>• CoEs include the total amount of course fees for the entire course.</li> <li>• The total amount of course fees on the CoE does not exceed the registered amount on PRISMS.</li> </ul>
<b>Written Agreements</b>	<ul style="list-style-type: none"> <li>• Written agreements itemise both tuition fees and non-tuition fees, and provide an Estimated Total Course Cost.</li> <li>• Written agreements set out the length of each study period for a course and the tuition fees for each study period for a course.</li> <li>• A signed Written Agreement is received prior to or at the same time as fees.</li> </ul>
<b>Study Periods</b>	Study periods are not longer than 24 weeks.
<b>Estimated Total Course Cost</b>	The Estimated Total Course Cost is the <u>combination</u> of estimated compulsory tuition <u>and</u> compulsory non-tuition fees.
<b>Fees Invoices</b>	<ul style="list-style-type: none"> <li>• Fees invoices do not request payment of more than 50% of a student's total tuition fees for a course before the student has begun the course.</li> <li>• Fees invoices after a student has started a course do not require any of the remaining tuition fees for the course to be paid more than 2 weeks before the beginning of the student's second study period for the course.</li> </ul>
<b>Management of Payment Details</b>	There is a method of recording all dates and amounts of payment (and non-payment) of tuition fees and non-tuition fees and the period of time covered by each payment for PRISMS reporting purposes and within reporting timelines. See <a href="#">PRISMS Provider User Guide</a>



## Timelines for reporting provider obligations in case of provider default or student default

EVENT	ACTION	NOTIFICATION TIMEFRAME
<b>Day of Provider Default</b>	Notify PRISMS and TPS Director	3 business days
	<p>Provider Obligation Period:</p> <p>In the case of provider default, a provider has 14 days to satisfy tuition protection obligations to an affected student, i.e.</p> <ul style="list-style-type: none"> <li>offer the student an alternative place that is accepted by the student in writing OR</li> <li>arrange for the student to be offered a place in an alternate course at the provider's expense OR</li> <li>refund the unused portion of tuition fees received by the provider for the course.</li> </ul>	Report outcomes within 7 days after provider obligation period
<b>Day Student Default is Confirmed</b>	Notify PRISMS and TPS Director	5 business days
	<p>Provider Obligation Period under a written agreement:</p> <p>Provider must pay a refund under written agreement to student or person specified in the written agreement, within 4 weeks after receiving a written claim from the student.</p>	Report outcomes within 7 days after provider obligation period
	<p>Provider Obligation Period if no valid written agreement/visa is refused:</p> <p>Provider must pay required refund amount prescribed under the Legislative Instrument <a href="#">Education Services for Overseas Students (Calculation of Refund) Specification 2014</a> within 4 weeks of the student default day if there is no valid written agreement, or if the student has been refused a visa in special cases.</p>	Report outcomes within 7 days after provider obligation period
	Entry of any SCVs to be made in PRISMS within 14 days of student default for whatever reason.	14 days

## Checklist of record keeping and reporting obligations

ACTION	TIMEFRAME
Notify PRISMS and TPS Director of provider default	Within 3 business days of default occurring
Attend to obligations in case of provider default	Within Provider Obligation Period of 14 days from day of provider default
Report how provider default obligations have been met	Within 7 days after Provider Obligation Period
Notify PRISMS and TPS Director of student default	Within 5 business days of default occurring
Attend to obligations in case of student default	Within Provider Obligation Period of 28 days from day of student default
Report how student default obligations have been met	Within 7 days after Provider Obligation Period.
All changes to PRISMS records must be made, including student course variations (SCVs). See <a href="#">SCV Quick Reference Guide</a> for details.	Within 14 days of the change coming into effect
Details of any payments of tuition fees received in a calendar month must be entered into PRISMS	Within 14 days of the end of the calendar month
Student contact details (and contact details for a parent/legal custodian if the student is under 18 years of age) must be confirmed in writing and updated as necessary	At least every six months
Student assessment records must be retained	For at least two years after the student ceases to be enrolled
Student details prescribed under the <a href="#">ESOS Act</a> must be retained	For at least two years after the student ceases to be enrolled.
School Administration should be aware there are serious penalties for failure to meet provider obligations.	
<b>The following staff member/department is responsible for reviewing and updating school procedures for fees, refunds and TPS obligations:</b>	
<i>Carrie Cousar</i>	<i>Director of Admissions</i>
<b>The following staff member/department is responsible for reviewing and updating the school refund policy for overseas students:</b>	
<i>Richard Stone</i>	<i>Chief Operating Officer</i>
Information in this section should be checked and updated whenever there is a change of fee structure, information about payment of fees or refunds, or in regulations relating to fees or refunds.	
<b>THIS CHECKLIST WAS LAST UPDATED BY</b> <b>Carrie Cousar</b> <b>on</b> <b>24/05/22</b>	

## General Provider Obligations

### References:

#### Giving information about accepted students

The Director of Admissions (the *PRISMS Administrator*) is responsible for notifying the National ESOS Authority via PRISMS within 14 days after the event specified occurs:

- the name and any other prescribed details of each person who becomes an accepted student of that provider
- for each person who becomes an accepted student - the name, starting day and expected duration of the course for which the student is accepted
- the prescribed information about an accepted student who does not begin his or her course when expected
- any termination of an accepted student's studies (whether as a result of action by the student or the provider or otherwise) before the student's course is completed
- any change in the identity or duration of an accepted student's course
- any other prescribed matter relating to accepted students (for other prescribed matters relating to accepted students, see [ESOS Regulations](#)).

#### Record keeping

The Director of Admissions (the *PRISMS Administrator*) is responsible for ensuring required records of student details are kept for at least two years after the student ceases to be enrolled. However, records do not need to be kept up to date after cessation of enrolment.

The records must consist of the following details for each accepted student:

- the student's current residential address
- the student's mobile phone number (if any)
- the student's email address (if any)
- any other details prescribed by the regulations

For subsection, refer to the [ESOS Act](#), the records of each accepted student who is enrolled with a provider or who has paid any tuition fees for a course provided by the provider must include the following details:

- the amount of money that the student has paid to the provider, including the separate identification of tuition fees and non-tuition fees
- for an amount of tuition fees that the student has paid to the provider for a course:
  - whether the amount was paid for the full course or part of the course; and
  - if the amount was paid for the full course, the duration of the course; and
  - if the amount was paid for part of the course, the duration of that part of the course;
- copies of written agreements to which the provider and student are parties
- any amounts that:
  - have become payable, directly or indirectly, to the provider by the student for the student to undertake a course; and
  - have not been paid
- the amount that a student will be charged to access the student's records

## National Code of Practice for Providers of Education and Training to Overseas Students 2018

### ESOS Act

### ESOS Regulations

Scotch College Adelaide provides information to intending students about the grounds on which an enrolment can be deferred, suspended or cancelled prior to enrolment. The policy for deferring, suspending or cancelling a student's enrolment is referred to in school documentation in:

- Scotch College Adelaide International Student Policy
- Scotch College Adelaide International Student Handbook

Staff Member	Action
Head of School	Assess student application for deferment or suspension of study  Approve or reject student application for deferment or suspension of study
Head of School	Record and advise the student of the outcome of the application for deferment or suspension of study, and if the student request is granted, advise the student that deferring or suspending his/her enrolment may affect his/her student visa
Director of Admissions	Notify the National ESOS Authority via PRISMS as required under the <a href="#">ESOS Act</a> where the student's enrolment is deferred or temporarily suspended. The notification is to be made within 14 days of suspension or deferment.
Head of School	Ensure all records for all steps above are kept on the student's file.

It is the role of the following staff members to undertake these steps in the event of a school-initiated suspension or cancellation of enrolment. There are two options here, depending on whether or not there are extenuating circumstances:

Staff Member	Action
Head of School	<b>FIRST STEP</b> Make the decision to suspend or cancel a student's enrolment as per the school's Student Disciplinary and Investigation Procedures Policy provided in pre-enrolment information to the student, and assess if there are extenuating circumstances
Head of School	<b>OPTION 1</b> If there are <u>not</u> extenuating circumstances, inform the student in writing that: <ul style="list-style-type: none"> <li>the school intends to suspend or cancel his/her enrolment</li> <li>the student has 20 days to access the school's internal complaints and appeals process</li> <li>deferment or suspension of enrolment may affect the student's visa.</li> </ul> <p>Supervise the student's conditions of continuing enrolment and care arrangements, and process student's appeal.</p> <p>Advise the student in writing of the outcome of the appeal process including reasons for the outcome.</p> <p>If the outcome of the appeal favours the student, the school will also comply with the <a href="#">National Code of Practice for Providers of Education and Training to Overseas Students 2018</a></p>
Director of Admissions	If the outcome of the appeal upholds the school's decision, the school then notifies Department of Home Affairs via PRISMS within 14 days of this outcome that the student's enrolment is suspended or cancelled and continues to check suitability of care arrangements until one of the criteria in the <a href="#">National Code of Practice for Providers of Education and Training to Overseas Students 2018</a> is met.
Director of Admissions	<b>OPTION 2</b> If there are <u>are</u> extenuating circumstances relating to the welfare of the student, the school contacts Department of Home Affairs to discuss the situation, or report suspension or cancellation of enrolment of the student via PRISMS with an explanation, or both, depending on the severity of the situation. The student may still access the school's complaints and appeals process, but this can be done from offshore if necessary.
International Student Coordinator	Continue to check the suitability of the student's care arrangements (if necessary) as per the conditions in the <a href="#">National Code of Practice for Providers of Education and Training to Overseas Students 2018</a> unless it is necessary to advise Department of Home Affairs via PRISMS that the school can no longer approve the care arrangements for the student.
Head of School	If the student accesses the school's complaints and appeals process, advise the student in writing of the outcome of the appeal process, including details of reasons for the outcome.

Director of Admissions	<p><b>IN ALL CASES</b></p> <p>Record all outcomes and ensure all records for all steps above are kept on the student's file.</p> <p>In the case of a school-initiated suspension for longer than 28 days, inform the student that this may affect their visa and contact Department of Home Affairs.</p>
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It is the role of the following staff members to undertake these steps in the event of any cancellation of student enrolment, whether this be student-initiated or school-initiated, as any cancellation of enrolment is considered as student default:

Staff Member	Action
Director of Admissions	<p>Notify the National ESOS Authority/TPS Director via PRISMS:</p> <ul style="list-style-type: none"> <li>as required under the <a href="#">ESOS Act</a> where the student's enrolment is cancelled. The notification is to be made within 5 business days of cancellation.</li> <li>as required under the <a href="#">ESOS Act</a> where the student's enrolment is cancelled. The notification is to be made within 14 days of cancellation.</li> </ul> <p>Arrange for any refund of course fees (tuition fees and non-tuition fees) to be paid as per the school's written agreement and refund policy within timelines required for provider or student default.</p> <p>Notify the National ESOS Authority/TPS Director via PRISMS within 7 days after the end of the Provider Obligation Period as required under the <a href="#">ESOS Act</a> (refund under a written agreement about student default) :</p> <ul style="list-style-type: none"> <li>whether a refund had been provided</li> <li>details of the student the refund has been provided to</li> <li>details of the amount of the refund provided and</li> <li>the date the student's claim was received</li> <li>the amount claimed by the student</li> <li>the amount paid by the provider</li> <li>the date the refund was paid</li> <li>whether or not the refund was paid in accordance with the written agreement between the provider and the student</li> </ul>

Administrative documents relating to the school's policy on deferring, suspending or cancelling a student's enrolment are:

- Student application for deferment of commencement or suspension of studies
- School letter for informing student of intention to suspend or cancel enrolment
- School letter for informing student of intention to suspend or cancel enrolment in the case of extenuating circumstances.

The following staff member is responsible for reviewing and updating the policy on deferring, suspending or cancelling a student's enrolment and related administrative documents:

*Director of Admissions*

*Carrie Cousar*

Information in this section should be checked and updated whenever there is a change in regulations about the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#), or when existing policies need to be adapted or strengthened.

**THIS SECTION WAS LAST UPDATED BY Carrie Cousar on 24/05/22**

## Deferment, Suspension and Cancellation Policy

The purpose of this document is to make parents aware of the ways in which they can request to defer, suspend or cancel their child's enrolment at Scotch College Adelaide. Furthermore, this policy guides all Scotch College Adelaide staff engaged in the enrolment process so that all matters are transparent and fair.

This policy is relevant to the enrolment of domestic and international ('overseas') students.

This policy is not applicable to disciplinary investigation, suspension or termination of enrolment processes instigated by Scotch College Adelaide.

### Deferment of Studies

Scotch College Adelaide will consider a deferment of commencement of studies ('postpone the Date of Entry') for domestic students at the request of their Parent.

#### *For international students*

For international students, deferment will be considered in compassionate and compelling circumstances. These include but are not limited to:

- Change in family or financial circumstances
- Illness, where a medical certificate states that the student was unable to attend classes;
- Bereavement of close family members such as parents or grandparents
- Major political upheaval or natural disaster in the home country requiring emergency travel that has impacted on studies
- A traumatic experience which has impacted on the student

When a deferment is granted;

- The student will be informed whether the deferment is likely to affect the end date of their course as recorded on their CoE.
- If the course end date is not going to be affected by deferment of study, the deferment will be recorded in PRISMS and a variation of start date will be made to the CoE.
- If the course end date is going to be affected by deferment of study, PRISMS will immediately cancel the existing CoE and the PRISMS Administrator will create a new CoE for the student with a new start and end date.
- Delay in student obtaining a visa

All deferment requests must be made in writing to the College not later than four calendar months prior to the date of entry.

### Suspension of Studies

Scotch College Adelaide will consider a suspension of studies (for compassionate and compelling circumstances). These include but are not limited to:



- Change in family or financial circumstances
- Illness, where a medical certificate states that the student was unable to attend classes;
- Bereavement of close family members such as parents or grandparents
- Major political upheaval or natural disaster in the home country requiring emergency travel that has impacted on studies
- A traumatic experience which has impacted on the student

#### ***For International Students***

- The period of suspension will not be included in attendance calculations.
- The student will be informed that any suspension of their studies may affect their visa and told to contact the Department of Home Affairs.
- The student will be informed whether the suspension is likely to affect the end date of their course as recorded on their CoE;
- If the course end date is not going to be affected by suspension of study, the suspension will be recorded in PRISMS but no change will be made to the students CoE.
- If the course end date is going to be affected by a suspension of study, PRISMS will immediately cancel the existing CoE and the PRISMS Administrator will create a new CoE for the student with a more appropriate end date
- If the suspended student has left Australia, Scotch College Adelaide has the right to defer creation of a new CoE until a return to study date has been agreed upon

All requests for suspension of studies must be made in writing to the College. Supporting evidence may be requested.

#### **Cancellation or Termination of Enrolment**

Parents may cancel or terminate their child's enrolment by notice in writing to the College, not later than the first day of the term immediately preceding the Term during, or at the end of which, the student is to be withdrawn.

If Cancellation or Termination of Enrolment is not provided prior to this notice period, fees in lieu for the following term will be charged.

If Parents cancel or terminate the enrolment of a student in Year 12 after the last day of the first term, the Parents remain liable for the fees for the student's whole of year 12.

For students who are boarding in their final year, the parents remain liable for the full amount of the boarding component of the fees for that year, despite any change in status or withdrawal of the student in their final year.

#### ***For International Students***

- The date of cancellation or termination of enrolment will be recorded in PRISMS.
- Cancellation or Termination of enrolment for all students must be made in writing to the College.

[Suspension and Termination of Enrolment Policy – published to College website](#)

## Transfer Policy

### Reference: National Code of Practice for Providers of Education and Training to Overseas Students 2018

Scotch College Adelaide provides information to overseas students about the School's transfer policy.

The student will be released if they comply with required conditions in the first six months of a principal course. However, if the student is in the School's sector, the student is now restricted from transferring until they have completed the first 6 months of the first school course, not the principal course, unless the transfer reason meets an exception under Standard 7.

Under [Standard 5](#), if a student is under 18 years of age, there must be written confirmation that the parent or legal guardian supports the transfer, and the receiving provider's Letter of Offer must confirm acceptance of welfare responsibilities under [Standard 5](#) (if applicable).

See below for a copy of the School's transfer policy.

#### **For student transferring FROM Scotch College Adelaide TO another provider and the student has NOT completed his/her course.**

- Advise circumstances in which a transfer will be granted.
- Advise circumstances considered as reasonable grounds for refusing student's request, including when a transfer can be considered detrimental to student.
- Advise that a student under 18yo cannot be released for transferring from the principal course of study or preliminary packaged courses for a period of six months and conditions unless the criteria in [Standard 7](#) are met.
  - Sight a letter of offer from other provider;
  - if the student is under 18, check the student has written permission from a parent / legal guardian;
  - if the student is under 18, and if applicable, check the other provider has confirmed responsibility for approving welfare arrangements and there is no gap in welfare dates.
- Timeframe for assessing and responding to request for transfer, keeping in mind the 6 months restriction in [Standard 7](#).
- Advise the student he/she must contact Department of Home Affairs to ask whether a new visa is required, and provide the Department of Home Affairs with their contact details.
- All records for requests for transfers and letters of release and outcomes to be kept on student's file.

#### **For student transferring TO Scotch College Adelaide FROM another provider and the student has NOT completed his/her course**

- A student who is currently enrolled in another registered provider's course may be enrolled at Scotch College Adelaide prior to completion of enrolment in the first six months of enrolment in a principal course of study if:
  - The original provider has released the student and the student can provide a signed Letter of Release
  - the original registered provider / course has ceased to be registered;

- the original registered provider has had a sanction imposed by a relevant registration authority that prevents the student from continuing enrolment in the principal course; or
- any government sponsor of the student provides written support for a change of course to be in the student's best interests.
- Check in PRISMS if a student is currently enrolled with another provider
- Generate a Letter of Offer for the student if student is under 18years old, including an undertaking to take over welfare
- Scotch College Adelaide **MUST NOT** create a CoE until the student has been released from the original provider.
- **In the event a student has completed another course, the School should seek to be satisfied that 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.**

(\*NB: If the student is transferring from another state, the information required under state legislation may not automatically be included.)

Staff Member	Action
Director of Admissions	Assess student application for transfer against Scotch College Adelaide within stated timeframe.  Check documentation is complete (there is a Letter of Offer from new registered institution, as well as any other requirements under <a href="#">Standard 7</a> if student is under 18yo).  <b>Transfers will be recorded in PRISMS from 1 January 2018 and registered providers are no longer required to issue release letters.</b>
Director of Admissions	If request is denied, provide letter giving grounds for refusal, based on transfer policy, and advise student he/she can access complaints and appeals process. The registered provider <b>MUST NOT</b> finalise the refusal in PRISMS until the international student has been given an opportunity to access the complaints and appeals process, the international student withdraws from the process, or it the process finds in favour of the registered provider.
Director of Admissions	Check if refund is applicable
Director of Admissions	If request is granted, fulfil all reporting refund and reporting obligations as required for cancellation of student enrolment.
Director of Admissions	File all documents relating to transfer request on student's file.

Staff Member	Action
Director of Admissions	Check via PRISMS if student is already enrolled with another provider. Provide a Letter of Offer (and an undertaking to take over welfare of student if under 18yo) if School agrees to accept student.
Director of Admissions	Create CoE <b>ONLY AFTER</b> student has been released.

Director of Admissions	If student is from interstate, lodge Interstate Student Data Transfer Note.
Director of Admissions	File all documents relating to transfer request on student's file.

Administrative documents relating to the College's policy on student transfer are:

- Transfer request assessment flowchart.
- Student application for Transfer. Over 18 years of age must include Letter of Offer from new registered institution; under 18 years of age must include all three attachments:
  - Letter of Offer from new registered institution
  - permission from parent / legal custodian
  - confirmation new school/institution will undertake welfare.
- School's letter to advise request is denied, giving grounds for refusal and advising of student's right to appeal.
- School's release of CoE(s), with:
  - advice that the student must contact the [Department of Home Affairs](#) to ask whether a new visa is required and provide the Department of Home Affairs contact details.

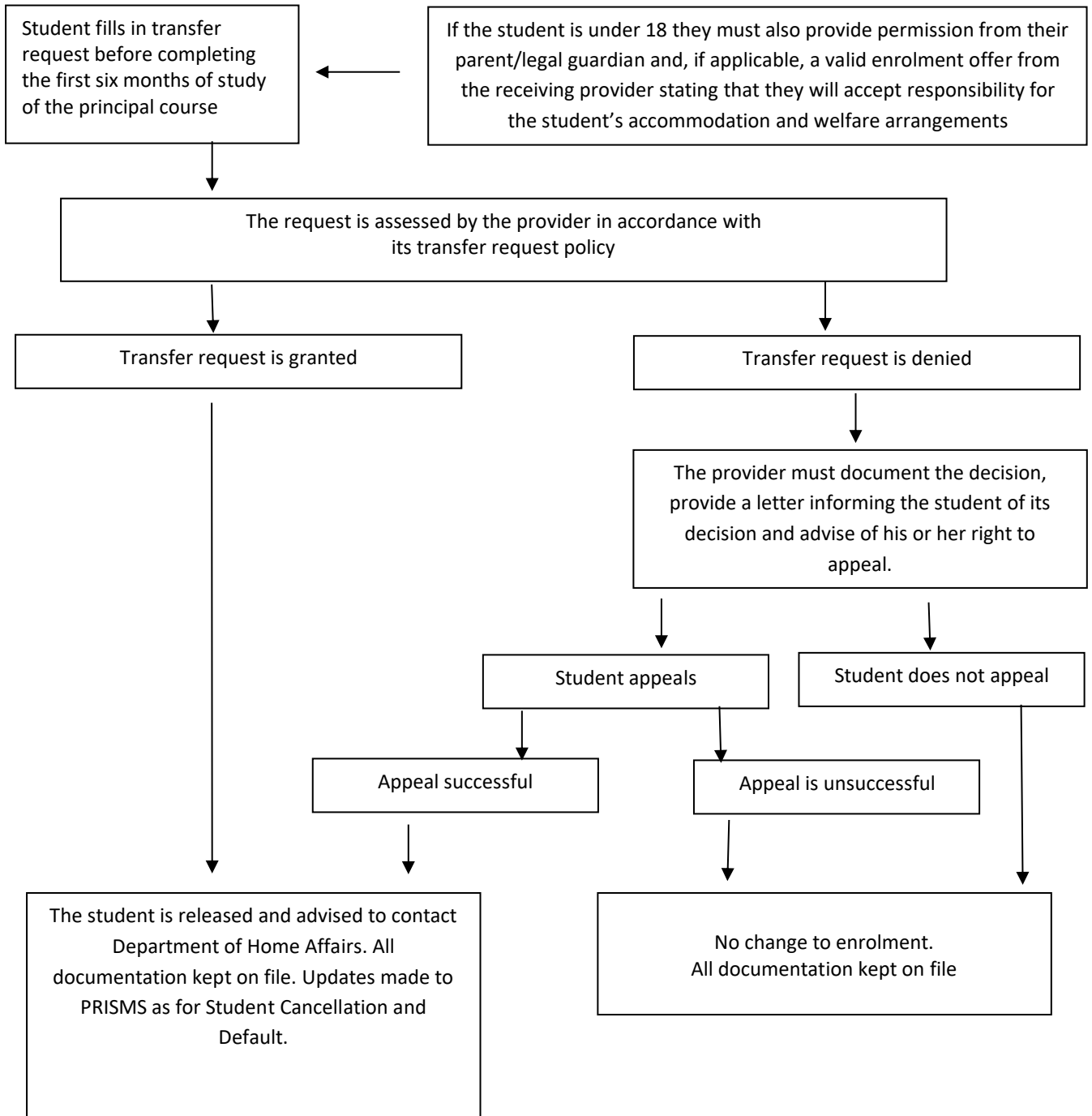
See copies of administrative documents below (page 43)

The following staff member is responsible for reviewing and updating the Transfer Policy and related administrative documents:	
<i>Director of Admissions</i>	<i>Carrie Cousar</i>
Information in this section should be checked and updated whenever there is a change in regulations.	

## **Student Transfer Request Assessment Policy for Full Fee Paying Overseas Students (FFPOS)**

1. Overseas students are restricted from transferring from their principal course of study for a period of six months. This restriction also applies to any course(s) packaged with a student's principal course of study.
2. Students can apply to be released to enable them to transfer to another education provider
3. Scotch College Adelaide will only release a student in the first six months of their principal course in the following circumstances:
  - The student has changed welfare and accommodation arrangements and is no longer within a reasonable travelling time of the College;
  - It has been agreed by the College the student would be better placed in a course that is not available at Scotch College Adelaide;
  - Any other reason stated in the policies of Scotch College Adelaide.
4. Scotch College Adelaide will NOT release the student in the first six months of their principal course in the following circumstances:
  - The student's progress is likely to be academically disadvantaged;
  - Scotch College Adelaide is concerned that the student's application to transfer is a consequence of the adverse influence of another party.
5. In order to be released, a student must have a letter from the receiving provider that a valid offer of enrolment has been made.
6. 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(s)/legal guardian or a suitable nominated relative;
  - Evidence that the student is always in DIAC approved welfare and accommodation arrangements.
7. All applications for transfer will be considered within 7 working days and the applicant notified of the decision.
8. Students whose request for transfer has been refused may appeal the decision in accordance with Scotch College Adelaide's Grievance Policy within 20 working days.

## Student transfer request assessment flowchart transfer request assessment flowchart



<b>Application for student transfer / letter of release</b>	
Student name: Year Level: Current Address in Australia: Address in home country: Phone no: Mobile no: Email address:	
<b>Reason for transfer:</b>  Please state why you wish to transfer to another school: <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	
<b>Attachments:</b> Attach a letter of offer from the institution to which you wish to transfer. If you are under 18 years of age and not in the care of a parent or suitable nominated relative, the letter of offer must also show that the institution will accept responsibility for approving your accommodation, support and general welfare arrangements.  If there are any gaps between school-approved accommodation, support and general welfare arrangements please detail any Department of Home Affairs approved interim arrangements.  If you are under 18 years of age, please attach a letter from your parents to indicate that you have their permission to transfer.  Attach any relevant supporting documentation.  This application will be assessed once all documentation has been received. The school may ask for more documentation if it requires it. Applications are usually processed in 10 working days.	
Student signature	Date

## Letter of refusal to release

Student name:

Year Level:

Current Address in Australia:

Address in home country:

Phone no:

Mobile no:

Email address:

We have received your application for a letter of release. As the reasons stated in your application did not meet the school's Student Transfer Request Assessment Policy, regrettably the school has refused to grant your application for the following reason/s:

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You have the right to appeal the school's decision in accordance with the school's [Grievance Policy](#) which is also available in the Scotch College Adelaide's International Student Handbook.

If you choose to appeal, until the process is complete, you must continue to maintain your enrolment and attendance at all classes as normal.

Scotch College Adelaide

Date:



## Grievance Policy

### References: National Code of Practice for Providers of Education and Training to Overseas Students 2018

Scotch College Adelaide has a [Grievance Policy](#), which complies with Commonwealth requirements and outlines a Complaints and Appeals process. Access to this policy is available to an overseas student at any time, but is has prescribed conditions under [Standard 10](#). If the School's Grievance process is invoked under any of these standards, provisions under [Standard 5](#) will also be applicable if the student is under 18 years of age and the School has approved accommodation, support and welfare arrangements.

**Copies of Scotch College Adelaide Grievance Policy are provided to students prior to enrolment and are again provided to students after commencement of studies.**

Parents/students acknowledge that they have read this policy as part of the written agreement.

The Grievance policy is provided to students in:

- Scotch College Adelaide International Student Policy (link provided)
- Scotch College Adelaide website

It is the role of the following staff members to undertake these steps in the event of a student accessing the School's Complaints and Appeals process.

Staff Member	Action
Attempting informal resolution of the problem	
International Student Coordinator	If the problem is NOT resolved informally, advising the student to access the School's Grievance process
International Student Coordinator	Overseeing the School's internal process as per the School's policy and within required timelines
International Student Coordinator	Maintaining and monitoring the student's enrolment (and care arrangements if under 18 years of age) whilst the complaints and appeal process is ongoing and making the student aware of the School's obligation to do this.
International Student Coordinator	<b>(a)</b> If the student is not satisfied with the result or conduct of the internal complaints or appeals process, advising the student of his/her right to access the external appeals process provided by the Overseas Students Ombudsman at minimal or no cost
International Student Coordinator	<b>(b)</b> If necessary, overseeing the external process as per the School's policy and within stated timelines
In the case of: <ul style="list-style-type: none"> <li><b>a)</b> notifying students who have been refused transfer to another registered provider</li> <li><b>b)</b> notifying students who are at risk of failing to meet course progress requirements</li> <li><b>c)</b> notifying students who are at risk of failing to meet attendance requirements</li> <li><b>d)</b> suspending or cancelling a student's enrolment, it is the role of the International Student Coordinator to undertake these additional steps:</li> </ul>	

International Student Coordinator	<p>When notifying the student of the school's decision to refuse a transfer to another registered provider under Standard 7, advise the student to access the procedures outlined in the Grievance Policy.</p> <p>When notifying the student of the School's intention to report the student to the National ESOS Authority, also advising the student he /she has 20 working days to access the procedures outlined in the Grievance Policy.</p> <p>In the case of <b>(b) and (c)</b> above, notifying the student if he/she intends to access the school's external appeals process, this must be done within <b>[e.g., two weeks]</b> of receiving written advice of the outcome of the internal process.</p> <p>When notifying the student of the school's intention to suspend or cancel enrolment, advise the student that he/she has 20 days to access the procedures outlined in the Grievance Policy.</p>
International Student Coordinator	<p>In the case of <b>(a)</b> above, enrolment will be maintained by the school unless the internal appeals process finds in the student's favour.</p> <p>In the case of <b>(b) and (c)</b> above, if the student does not access procedures outlined in the Grievance Policy, withdraws from the grievance process or the process is completed and results in a decision which supports the School, notifying the National ESOS Authority via PRISMS as soon as is practicable.</p> <p><b>NB:</b> in the case of <b>(b) and (c)</b> above, if the internal <u>or</u> external appeals process is accessed, the student's enrolment must be maintained until this process is completed, including welfare arrangements if applicable.</p> <p>In the case of <b>(d)</b> above, see reporting obligations in</p>
	<p><b>IN ALL CASES:</b></p> <p>Keeping written records of the complaint and all steps taken, and filing these on the student's file, including:</p> <ul style="list-style-type: none"> <li>• copy of written complaint;</li> <li>• copy of Letter of intention to report (if applicable);</li> <li>• copy of outcomes in writing, with reasons, provided to student.</li> <li>• evidence of preventative or corrective action taken by the School (as necessary).</li> </ul>

Further information is available on processes for handling complaints and appeals and timelines for reporting of students via the website of the [Overseas Students Ombudsman](#).

Specifically, see:

- Do providers have to wait for the Ombudsman complaint process to be completed, before reporting a student for failing to meet course progress or attendance requirements?*
- Do providers have to wait for the Ombudsman complaint process to be completed, before cancelling a student's enrolment for a reason other than unsatisfactory course progress or attendance?*

Administrative documents relating to the School's Complaints and appeals process are: [as applicable]

- Proforma for recording responses and actions in relation to student complaints

- Letter advising student to access School's internal Complaints and appeals process
- Letter advising student of outcomes of Complaints and appeals process, reasons for decisions made and advice about external appeals.
- Letter giving student information about accessing the School's external Complaints and appeals process (stand-alone alternative).

See copy of the School's [Grievance Policy](#).

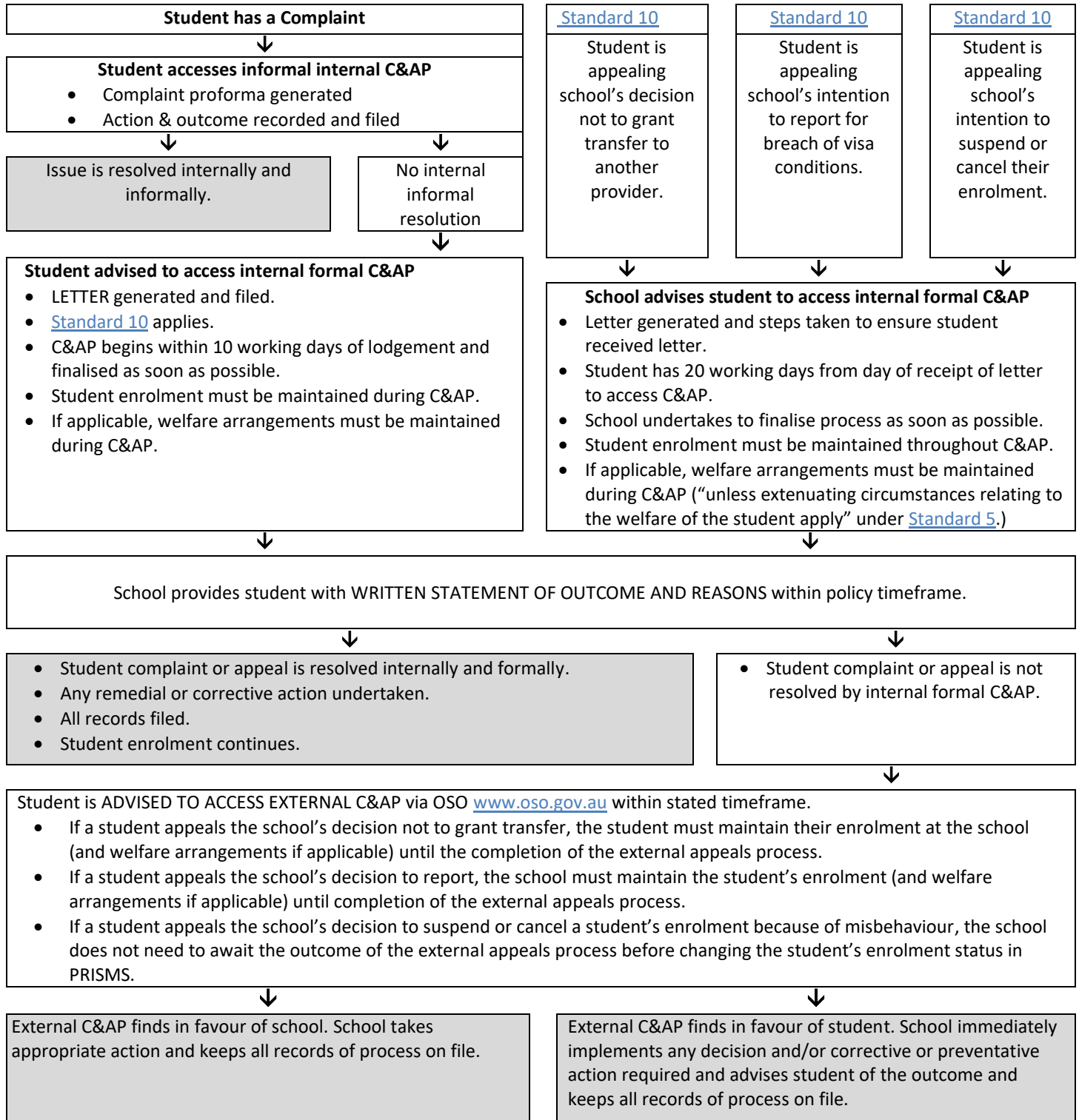
The following staff member is responsible for reviewing and updating the Transfer Policy and related administrative documents:	
<i>Director of Admissions</i>	<i>Carrie Cousar</i>

## Diagrammatic Overview of Complaints and Appeals Process (C&AP) NC Standard 8

This diagram should be checked and updated whenever there is a change in regulations about NC Standards 8 or related Standards, or when existing policies need to be adapted or strengthened. This process is outlined in the [Grievance Policy](#).

### COMPLAINTS

### APPEALS



## Grievance Policy for International students

### 1. Purpose

- The purpose of [Scotch College Adelaide's Grievance Policy](#) is to provide a student with the opportunity to access procedures to facilitate resolution of a dispute or complaint.
- The internal complaints and appeals processes are conciliatory and non-legal.
- Complaints against other student's grievances brought by a student against another student will be dealt with under the College Behaviour Policy/Code of Conduct.

### 2. Informal Complaints Resolution

- In the first instance, Scotch College Adelaide requests there is an attempt to informally resolve the issue through mediation/informal resolution of the complaint.
- Students should contact the International Student Coordinator in the first instance to attempt mediation/informal resolution of the complaint.
- If the matter cannot be resolved through mediation, the matter will be referred to the Deputy Principal and Scotch College Adelaide's internal formal complaints and appeals handling procedure will be followed.

### 3. Formal Complaints Handling Procedure

- The process of this grievance procedure is confidential and any complaints or appeals are a matter between the parties concerned and those directly involved in the complaints handling process.
- The student must notify the College in writing of the nature and details of the complaint or appeal.
- Written complaints are to be lodged to the Deputy Principal and appeals are to be lodged with the Principal.
- Where the internal complaints and appeals process is being accessed because the student has received notice by the College that the College intends to report him/her for unsatisfactory course attendance, unsatisfactory course progress or suspension or cancellation of enrolment, the student has 20 days from the date of notification in which to lodge a written appeal.
- Internal complaints and appeals processes are available to students at no cost.
- Each complainant has the opportunity to present his/her case to the Principal.
- Students may be accompanied and assisted by a support person at all relevant meetings.
- The formal grievance process will commence within 10 working days of the lodgement of the complaint or appeal with the Principal.
- Once the Principal has come to a decision regarding the complaint or appeal, the student will be informed in writing of the outcome and the reasons for the outcome.
- If the grievance procedure finds in favour of the student, Scotch College Adelaide will immediately implement the decision and any corrective and preventative action required.
- Scotch College Adelaide undertakes to finalise all grievance procedures within 10 working days
- For the duration of the appeals process, the student is required to maintain enrolment and attendance at all classes as normal, unless the Principal indicates alternate arrangements.

#### 4. External Appeals Process

- If the complaints procedure does not find in favour of the student or the student is dissatisfied with the result of the complaints procedure, he/she will be informed of the external complaints and appeals process available to them at minimal or no cost.
- The external body used for Scotch College Adelaide external complaints and appeals processes is the [Overseas Students Ombudsman](#).

#### 5. Definitions

- Working Day – any day other than a Saturday, Sunday or public holiday during term time
- Student – a student enrolled at Scotch College Adelaide or the parent(s)/legal guardian of a student where that student is under 18 years of age
- Support person – a friend/teacher/relative not involved in the grievance. Please note that lawyers are not acceptable support persons at this stage of the complaints handling process.

Proforma for recording responses and actions in relation to student complaints		
Student Details:		
Student name: Year Level: Current Address in Australia: Parent Name: Address in home country: Phone no: Mobile no: Email address:		
Complaint Details:		
Date:		
Complaint is INFORMAL	Description:	
Complaint is FORMAL	<input type="checkbox"/> Written complaint is attached	
Details of Remedial Action #1		
Details of response to Remedial Action #1		
Details of Remedial Action #2		
Details of response to Remedial Action #2		
Resolution Process Outcome:		
<input type="checkbox"/> COMPLAINT RESOLVED	<input type="checkbox"/> NO FURTHER ACTION <input type="checkbox"/> DOCUMENTATION FILED	
<input type="checkbox"/> COMPLAINT NOT RESOLVED	<input type="checkbox"/> ADVICE FOR NEXT STEP PROVIDED HAS BEEN PROVIDED [Enter details]	
_____	_____	_____
SIGNATURE	NAME	DATE

## Checklist and Sample wording relating to the School's Grievance Processes

\*\*Sample wording below, as well as that shown in the template letters for complaints and appeals processes, should be always customised for purpose.

### CHECKLIST:

1. All letters should be addressed to the student directly and contain relevant contact details for follow up and student records.
2. Where relevant, letters should reference:
  - the issue of concern
  - previous steps or remedies
  - details of and timelines for any steps or processes the student may wish to or is entitled to take
  - details of and timelines for any steps the school will take
  - actions being taken or outcomes of investigations by the school and reasons for actions or outcomes
  - the ability of students to access the external complaints and appeals process via the [Overseas Students Ombudsman](#) if they are dissatisfied with the internal School complaints and appeals process.
3. If necessary, the School should advise the student of the progress of their complaint, particularly if there is a delay in processing a complaint or appeal.

Scotch College Adelaide  
 CRICOS Provider No. 00615B  
 Student name:  
 Year Level:  
 Current Address in Australia:  
 Address in home country:  
 Phone no:  
 Mobile no:  
 Email address:  
 Date:

We are advised by *(insert name and role of person)* that the issue of *(describe issue/concern/complaint)* that you first raised on *(insert date)* has not been satisfactorily resolved. *(Provide further details or summary of process if applicable.)*

If you wish to pursue this matter further, we invite you to follow Scotch College Adelaide's Formal Complaints Handling Procedure, as per our [Grievance Policy](#).

As a first step in this process, please notify *(the Principal / other person / + contact details if applicable)* in writing of the nature and details of your concerns.

The *(Principal / other person)* will consider your concerns within 10 working days and will *(insert as applicable, e.g., arrange a meeting with you / respond to you in writing)*. You will be notified of the outcome of your request, and the reasons for any School decisions.

We wish to advise there has been a delay in the processing of your complaint. The reason is *(insert details)*.



We will contact you again (*insert timeframe, e.g., as soon as this matter is resolved or within .... working days*).

In response to your written concerns of (*insert date .././..* ), Scotch College Adelaide advises the outcome of your request is (*insert details of outcome*)

The reasons for this decision is as follows:  
(*insert reason(s)*).

(*If decision is in student's favour, insert details of remedy*)

(*If decision is in school's favour, advise of action school will take and advise the student*) If you wish, you may seek external advice or redress through the [Overseas Students Ombudsman](#).

#### NOTES:

- There is no cost to you for taking part in Scotch College Adelaide's Grievance resolution process.
- A support person for either party may be present at any meetings arranged to assist / resolve this issue. Please see our [Grievance Policy](#) for the definition of "support person".
- Copies of all relevant documents and meeting notes will be retained on your file.
- If your case is supported by the Scotch College Adelaide, immediate corrective or preventative action will be taken, and you will be advised in writing of the outcome of any action taken.
- If your case is not supported by Scotch College Adelaide, you will be advised of the reasons for this decision in writing, and you are liberty to seek redress through the office of the [Overseas Students Ombudsman](#).
- If you choose to appeal, until the process is complete, you must continue to maintain your enrolment and attendance at all classes as normal.

**Sample Letter 1 – advising student to access School’s internal Grievance Process.**

Scotch College Adelaide  
CRICOS Provider No. 00615B

*Insert Date:*

*Insert Student name:*

*Year Level:*

*Current Address in Australia:*

*cc. Insert parent’s names*

*Insert Parent’s address*

Dear student,

This letter is to inform you that in relation to (*specify grievance*) Scotch College Adelaide advises that in order to (resolve this complaint / lodge an appeal), you should now follow the internal complaints process, as outlined in the [Scotch College Adelaide Grievance Policy](#).

The formal internal (complaints/appeals) process will commence within 10 working days of the lodgement of the (complaint/appeal) with the Deputy Principal. The College undertakes to finalise the process as soon as practicable.

You may be accompanied and assisted by a support person of your choice at any relevant meetings.

Scotch College Adelaide will maintain your enrolment for the duration of the (complaints/appeals) process and it is expected that you will attend all classes as normal.

Yours sincerely,

Name

Position

Scotch College Adelaide

Carruth Road TORRENS PARK SA 5062

**Sample Letter 2 – advising student of outcomes of the Grievance Process, reasons for decisions made and advice about external appeals.**

Scotch College Adelaide  
 CRICOS Provider No. 00615B  
*Insert Date:*  
*Insert Student name:*  
*Year Level:*  
*Current Address in Australia:*

*cc. Insert parent's names*  
*Insert Parent's address*

Dear student,

This letter is to advise you of the outcome of your formal internal (complaint/appeal) regarding *(insert summary of grievance details)*. *(Insert details of and reasons for outcome)*

**OUTCOME 1 - the complaint/appeals process results in a decision that supports the student**

Scotch College Adelaide will immediately implement this decision and/or take the following corrective and preventative actions. *(Specify actions to be taken)*. You will be advised in writing of the outcome of these actions.

**OUTCOME 2 - the complaint/appeals process results in a decision that supports the school**

If you choose, you may now access the external (complaints/appeals) process as outlined in the Grievance Policy.

Any external (complaint/appeal) should be lodged with the Overseas Students Ombudsman within 10 working days from the date of this letter. The Overseas Student Ombudsman offers a free and independent service for overseas students.

*(If the complaint/appeal is in regards to course progress or attendance (NC DSt 10 or 11) include the following)*

If you now choose to lodge an external appeal with the Overseas Students Ombudsman, Scotch College Adelaide will maintain your enrolment for the duration of the complaints and appeals process and it is expected that you will attend all classes as normal.

*(If the complaint/appeal is in regards to suspension or cancellation of enrolment in accordance with NC DSt 13, you could include the following)*. Please be advised that if you now choose to lodge an external appeal with the Overseas Students Ombudsman, Scotch College Adelaide is not required to maintain your current enrolment status throughout this process. As such, your enrolment will be (suspended/cancelled) as at *(insert date)*.

Yours sincerely,

Name

Position

Scotch College Adelaide

Carruth Road TORRENS PARK SA 5062

**Sample Letter 3 – Stand-alone letter giving student information about accessing the school’s external Grievance Process.**

Scotch College Adelaide  
CRICOS Provider No. 00615B

*Insert Date:*

*Insert Student name:*

*Year Level:*

*Current Address in Australia:*

*cc. Insert parent’s names*

*Insert Parent’s address*

Dear student,

The College acknowledges your letter dated xx/xx/20xx advising that you are not satisfied with the outcome of the decision made in relation to your internal (complaint/appeal). *(Insert summary of grievance details.)*

You may lodge an external (complaint/appeal) with the Overseas Students Ombudsman at no cost to yourself. The Overseas Student Ombudsman offers a free and independent service for overseas students

*(If the complaint/appeal is in regards to course progress or attendance (NC DSt 10 or 11) include the following)*

If you now choose to lodge an external appeal with the Overseas Students Ombudsman, Scotch College Adelaide will maintain your enrolment for the duration of the complaints and appeals process and it is expected that you will attend all classes as normal.

*(If the complaint/appeal is in regards to suspension or cancellation of enrolment in accordance with NC DSt 13, you could include the following)* Please be advised that if you now choose to lodge an external appeal with the Overseas Students Ombudsman, Scotch College Adelaide is not required to maintain your current enrolment status throughout this process. As such, your enrolment will be (suspended/cancelled) as at *(insert date)*.

Yours sincerely,

Name

Position

Scotch College Adelaide

Carruth Road TORRENS PARK SA 5062

## Welfare and Accommodation Policy

### References:

National Code of Practice for Providers of Education and Training to Overseas Students 2018  
ESOS Act

The 2018 National Code requires that intending students are provided with relevant information about accommodation options prior to enrolment.

If a student is under 18 years of age, the following visa condition applies: [Student Visa](#)

Description
<p>If you have not turned 18 you must maintain adequate arrangements for your accommodation, support and general welfare for the duration of your stay in Australia.</p> <p>To maintain adequate arrangements for welfare you must stay in Australia with:</p> <ul style="list-style-type: none"> <li>• your parent or legal guardian, or</li> <li>• a relative who has been nominated by your parents, or</li> <li>• guardians who are aged over 21 and is of good character, or</li> <li>• accommodation, support and general welfare arrangements that have been approved by your education provider.</li> </ul> <p>Note: You <b>must</b> not change those arrangements without the written approval of your education provider.</p> <p>If your welfare arrangements are approved by your education provider you must not travel to Australia until your welfare arrangements are due to commence.</p>
<p>Information about Scotch College Adelaide's Welfare and accommodation policy is provided to students in pre-enrolment information in the:-</p> <ul style="list-style-type: none"> <li>• Scotch College Adelaide International Student Policy</li> <li>• Scotch College Adelaide International Student Handbook</li> </ul>

Scotch College Adelaide keeps up to date records of students' current addresses as required. It is the role of the following staff member (s) to undertake these steps in updating and keeping written records of contact details for students and where applicable parent(s) / legal custodian (s) annually.

Staff Member	Action
International Student Coordinator	Every 6 months request that student / parent(s) / legal custodian (s) confirm in writing that contact details in school records are: <ul style="list-style-type: none"> <li>• current</li> <li>• complete</li> </ul>
Director of Admissions	Update records where necessary and file details of changes made

For each full fee paying 500 visa subclass student under 18 years of age for whom the School has undertaken to approve accommodation, support and general welfare arrangements, there is a requirement to have documented procedures for checking the suitability of these arrangements.  
Further information about Scotch College Adelaide administration of accommodation options and obligations for full fee paying 500 visa subclass student under 18 years of age can be found as follows:

It is the role of the following staff members to undertake these steps in administering the School's welfare and accommodation policies and procedures:

**If a student is living with Adult relative approved by the Department of Home Affairs**

Staff Member	Action
Director of Admissions	Provide information about school requirements to student guardians as per <b><i>'Procedures if student is living with a student guardian approved by Department of Home Affairs'</i></b> (below) and administer any requests to approve alternative arrangements if the approved adult wishes to depart the country for compassionate or compelling reasons.

**If the School is confirming approval of appropriate accommodation and welfare (i.e. providing the CAAW letter from PRISMS)**

Staff Member	Action
Director of Admissions	Create the CAAW in PRISMS and advise student he/she cannot enter the country before the start date of approved arrangements.
Director of Admissions	If a student under 18 years of age is changing or has changed living arrangements and the School has concerns about approval of the arrangements, where possible contact Department of Home Affairs asap for further advice prior to reporting via PRISMS that the school no longer approves
Director of Admissions	<p>Check suitability of student's accommodation, support and general welfare arrangements, including in the case the student's enrolment being suspended or cancelled by the School, as per requirements in Standard 5.3, i.e., until</p> <ul style="list-style-type: none"> <li>• welfare is accepted by another provider, or</li> <li>• the student leaves the country, or</li> <li>• other arrangements are made that satisfy Migration Regulations, or</li> <li>• the School reports it can longer approve arrangements*</li> </ul> <p>*NB. If approving homestay or other accommodation arrangements, state legislative requirements for child protection also apply.</p>
Director of Admissions	<p>When a student's enrolment ceases, also update CAAW records in PRISMS. Cancelling a CoE does not automatically cancel welfare responsibilities.</p> <ul style="list-style-type: none"> <li>• If Scotch College is no longer able to approve the welfare arrangements of a student, the Director of Admissions will make all reasonable efforts to ensure that the student's parents or legal guardians are notified immediately.</li> </ul> <p>If the student transfers to another provider or leaves the country prior to completion of course, record this in the "Comments" field under the Welfare Tab in the student's CoE, and click on the change of accommodation/welfare link. It will be possible to print a copy of the updated record. (A PRISMS alert that there is a clash of arrangements with another provider is also a signal to update this information in PRISMS.)</p>

## **Accommodation and Welfare Policy for Full Fee Paying Overseas Students (FFPOS)**

### **1. Scotch College Adelaide's FFPOS Accommodation and Welfare Principles:**

- At Scotch College Adelaide all FFPOS students are required to have a Scotch College approved local guardian. If parents are unable to appoint one, or the parent appointed guardian does not meet the necessary criteria, Scotch College will appoint one for parents at a cost.
- In the case of a FFPOS student living with an approved relative/guardian as defined by DIBP, a Confirmation of Appropriate Accommodation and Welfare form (CAAW) is not required as the College is not responsible for the student's welfare.
- All homestay fees are payable in advance as per the requirements of our homestay partners.
- The student will be provided with the details of the International Student Coordinator on arrival at the College in case of emergency.

### **2. We require an appointed local guardian to:**

- Maintain regular contact with Scotch College;
- Attend interviews at the College to discuss the student's progress, including appointments regarding course selection and career planning;
- Immediately notify the College of any problems that need to be resolved;
- Provide a translated copy of school reports to the student's parents;
- Support parents with clarifying any questions regarding payment of school related fees;
- Ensure students attend for the full Term including our beginning and end of year ceremonies, unless negotiated with Head of School prior to the commencement or end of a Term;
- Be required to attend meetings with the Head of Middle or Senior School, the International Student Coordinator, Head of House or other relevant staff of Scotch College Adelaide, at the College, as required;
- Coordinate private tuition for students as required;
- Maintain regular contact with student's parents;
- Maintain regular contact with the student (minimum contact requirement is once every 14 days by telephone or personal contact). Face to face contact should occur once per 21 days;
- Support the parents in their absence in all matters concerning the student's welfare;
- Be contactable by the College as required (must be able to provide 24 hours, 7 days a week telephone advice or emergency assistance if required);
- Provide a local orientation for the students including, but not limited to:
  - Safety and security briefing, including details of emergency services
  - Facilitate opening local bank account if required
  - Assist in purchasing a phone SIM card if requested
  - Public transportation information
  - Medical and other support services available to students
  - Referral and assistance with personal problems/issues
  - Information about Australian law
- Supporting students in obtaining school related items, including uniform, as needed;
- Arrange for any necessary medical attention where a signature or Parent/Guardian consent is required. For boarding students, this will require liaison with the Boarding House;
- Notify the College if they (the Guardian) will be absent (i.e., interstate or overseas) for any period;
- Regularly organise student events to promote student's exchange of experience in studying abroad in Australia to enhance friendship and teambuilding;
- Accompany students to medical appointments during business hours;



- Make sure students arrive safely in Adelaide;
- Provide airport pick-up service for students that arrive in Australia for the first time. Inform parents of student's arrival and provide them with the student's local contact details;
- Access arrival details for student returns to Adelaide at the end of holiday breaks as well as confirm arrival in Adelaide and inform parents of the student's arrival;
- Assist the student to book airline tickets for school breaks;
- Liaise with the College on behalf of the students if there are any problems regarding accommodation (either in Homestay or Boarding);
- Regularly liaise with Boarding House staff / Homestay providers to ensure the student is safe and happy in their accommodation;
- Ensure that the student does not change address without notifying the College or alter accommodation arrangements without the College's prior approval. For boarding students, ensuring that the contact details for parents remain up to date at all times;
- Assist in the process for finding alternate accommodation arrangements during boarding house closures (for boarding students only);
- Ensure the information provided on CareMonkey, the College's student medical and permission management system, is kept up to date;
- Be the main contact for CareMonkey and manage the account on a daily basis to authorise excursions, update medical information (via the parent) and make payment for additional trips/tours that students choose to go on. The guardian must liaise with the parent on a regular basis at least once a term) to ensure the student's medical information is up to date;
- Sign all documents on behalf of parents;
- Ensure that the conditions of the student's Visa are explained clearly to the student and their families, and ensure compliance with these conditions;
- Ensure that the student holds a valid passport for the duration of their enrolment and arrange renewal 6 months before expiration of passport;
- Provide relevant information to student if his/her passport is expired or lost;
- Provide certification service and assist student with document translation, such as school report and driver's license.
- Scotch College will be conducting regular audits on the student's appointed guardian.

#### **Appointed Guardians MUST:**

- Reside in Adelaide;
- Read and speak both English and the students first language;
- Agree with the expectations outlined in the Guardianship Arrangements document.

#### **3. FFPOS studying with Scotch College Adelaide have 3 accommodation options:**

1. Live with parent/guardian or Department of Home Affairs approved relative (no welfare responsibility by the College);
2. Scotch College Adelaide Boarding House;
3. Scotch College Adelaide approved Homestay providers.

## Conditions:

### 1. Living with parent/guardian or DIBP approved relative:

- (a) At the time of enrolment, all FFPOS students are required to provide the College with details of their nominated Parent/Local Guardian. The appointment of the nominated relative (which meets all the required criteria) is the responsibility of the student's parents but must meet the following DIBP criteria:
  - i. nominated relative must be one of the following: brother, sister, stepbrother, stepsister, step-parent, grandparent, step-grandparent, aunt, uncle, step-aunt, step-uncle, niece, nephew, step-niece, step nephew or spouse;
  - ii. DIBP requires this guardian to be over 21 years old, an eligible relative and of good character.
- (b) In the case of a student living with an approved relative/guardian as defined by DIBP a Confirmation of Appropriate Accommodation and Welfare form (CAAW) is not required as the College is not responsible for the student's welfare. If the College has any concerns about the welfare of a student, it will contact the parents/guardians in the first instance. If the College believes the student is in some kind of danger it will contact DIBP as a matter of urgency.
- (c) Where the parent/s of a student has been granted a Guardian Visa (or equivalent) for the purpose of caring for a student attending the College as a day student, the following visa conditions apply: [Click Here](#). It is essential that the parent or nominated guardian:
  - i. resides with the student at all times;
  - ii. must hold an appropriate visa enabling them to remain in Australia until the student is 18 years of age;
  - iii. provided the College with a copy of the parent's passport photo and visa page prior to the student commencing;
  - iv. advised the College of the student's and the parent's residential details, phone and email prior to the student commencing and thereafter within seven days of any change in these details.
- (d) Parents / guardians are not permitted to depart Australia without the student for who they are the guardian unless they have provided the department evidence that:
  - i. There are compassionate or compelling circumstances to leave the country;
  - ii. Alternative arrangements have been made for the student's accommodation, general welfare and support until the parent/guardian's return that fit within the rules provided by DIBP. Note that alternative arrangements must be approved by Scotch College Adelaide subject to DIBP conditions. In this situation the Director of Admissions must be notified.

### 2. Accommodation with Scotch College Adelaide Boarding House:

- (a) Scotch College Adelaide offers an excellent Boarding Program, which is also available to FFPOS, who will not be residing with a parent during their enrolment at the College. Boarding is offered from Year 7 to Year 12.
- (b) In this instance, the College will provide a letter confirming approval of appropriate accommodation and welfare (CAAW letter) with the Confirmation of Enrolment created in PRISMS. Students may not enter the country prior to the starting date of the approved welfare arrangements. If the

circumstances change and Scotch College cannot provide welfare, the Director of Admissions will notify PRISMS within 24 hours.

- (c) The College must also approve any changes to arrangements agreed with parents of FFPOS. This includes any requests by students under 18 years of age to attend “Schoolies Week” on completion of Year 12.
- (d) Boarding students must return home during each holiday period or alternatively stay in short term homestay accommodation organised by our homestay partners. They may also spend this time with family or friends as long as this arrangement is approved by the parents and College.

### 3. **Accommodation with Scotch College Adelaide Approved Homestay:**

- (a) In accordance with Scotch College expectations, the approved homestay providers will provide the College with current police checks and working with children certificates for each homestay family which hosts a Scotch College Adelaide student;
- (b) The College will monitor arrangements and seek feedback from students/parents/guardians. This is to ensure their homestay host and guardian provide adequate care and service meeting the expectations of their family and the College.
- (c) Legislation requires that students notify Scotch College Adelaide of their address, phone and e-mail prior to commencement and within 7 days of any changes when enrolled. The International Student Coordinator must approve any changes to homestay arrangements before the changes take place. When necessary, the International Student Coordinator will help the student find appropriate alternative accommodation.
- (d) If a student changes their accommodation arrangements without the approval of the College, or they refuse to move to appropriate accommodation, the College will first contact the parent/guardian and then a report will be made to DIBP outlining the fact that Scotch College Adelaide no longer approves the student’s arrangements. Such a report may lead to the cancellation of a student’s enrolment and per Scotch College Adelaide rules and expectations under Standard 13 of the national code and DIBP Visa conditions.

### 4. **Termination, Suspension or Cancellation of Enrolment**

- In the case of termination, suspension or cancellation of enrolment, the student must reside in the Scotch College Adelaide Boarding House, an approved homestay or parent/guardian until the enrolment status of the student is finalised.
- When a student enrolment is terminated, suspend or cancelled, Scotch College Adelaide will notify the parent or approved relative, the Homestay and the Welfare Guardian in writing of this revised enrolment status. Scotch College Adelaide will maintain on going contact with these parties, including visits to the homestay, to ensure that the conditions of standard 5 of the National Code are being met.
- If during this revised enrolment status period, a student elects to reside with their parent or approved relative in Australia, the parent or approved relative must collect the student from the Scotch College Adelaide campus, provide written details of residential address while living in Australia and agree to meet with a Scotch College Adelaide staff member in the residence at prescribed intervals until the enrolment status of the student is finalised.

### 5. **Review**

Scotch College Adelaide will ensure continued compliance with the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) annually.

- Guardianship audit tool – Scotch College

## Homestay Policy

Scotch College has partnered with approved homestay providers, to create a safe and friendly environment for Homestay students. Through regular meeting with the International Student Coordinator the school remains fully informed of the welfare of the students, and regular meetings with the students ensure their level of satisfaction with their homestay families is adequate.

Through our partnership with approved homestay providers, Scotch College Adelaide, delivers global standards for homestay accommodation. We embrace core values, standards, procedures and technologies, which are recognised by the Australian Government. Our hosts embrace diversity and allows for both student and host family to learn from each other, increasing their cultural awareness. Approved facilitates are safe, secure and culturally enriching.

Site visits are routinely conducted and police checks and working with children certificates are recorded.

### **The Homestay Parents Responsibilities are:**

- The Homestay Parent will provide a safe, secure, private bedroom for the students' sole use with suitable storage space for clothes, personal effects and study materials, and suitable facilities including a desk, a chair and adequate lighting for study purposes.
- The Homestay Parent and any adult person living or staying in the host home must have a current Police clearance with specific reference to working with children.
- The Homestay Parent will ensure the home is clean and has appropriate furnishings suitable for the students.
- The Homestay Parent will ensure the student has access to a shared or private bathroom, with reasonable time allowed for showers (Standard 5 minutes).
- The Homestay Parent will ensure there is access to kitchen, living areas, laundry facilities and shared areas of the home.
- The Homestay Parent will ensure there is some form of heating in winter if required and cooling in summer.
- The Homestay Parent will provide the student with any keys, alarms or passwords required to have reasonable free access to the homestay residence.
- The Homestay Parent will wash the student's clothing. It is the student's responsibility to place all clothes requiring washing in the basket provided every day.
- Clean bed linen and towels will be provided by the Homestay Parent, but the student will be expected to make their own bed.
- If the student is sick and unable to attend school, the Homestay Parent must contact the College and make suitable arrangements for supervision. Emergency support will be available through guardian and International Student Coordinator.
- The Homestay Parent will assist the student to access any necessary medical, dental, hospital or other health-related services, including making appointments and, where necessary, accompany the student to those appointments, and if required, advise the College of any medical issues. The International Student Coordinator must be informed of any serious medical matters.
- The student's breakfast, lunch and evening meal will be provided and also snack foods between meals (as required). (The Homestay Parent will discuss meal times with students when they arrive, and also their likes and dislikes.)
- The Homestay Parent will provide an environment that will encourage students to experience life as a member of the family and, where suitable, include students in family related activities.

- The Homestay Parent will provide an orientation within the family home, the use of facilities and security. This should include household protocols and safety rules about access and the use of shared areas or facilities such as swimming pools, internet, telephone, mealtimes, visitors and appropriate times to return home during the week and on weekends.
- The Homestay Parent will orientate students to the local area including public transport and getting to and from the College; the location of shops, doctors or medical facilities; and recreation areas.
- The Homestay Parent will ensure the student is aware of emergency numbers including 000, location of police stations and Australian laws pertaining to under 18 year olds.
- The Homestay Parent will grant full access to all areas of the host home to the International Student Coordinator.
- The Homestay Parent will ensure that students are appropriately supervised at all times throughout the duration of residing in the homestay including:
  - i) maintaining suitable supervision of students outside of College hours;
  - ii) monitoring the student's general welfare including the students' social activities;
  - iii) liaising with Scotch College Adelaide approved guardians.
- The Homestay Parent, if required, will attend meetings with College staff.
- The Homestay Parent will contact the College regarding any student welfare, academic progress and attendance issues. Similarly, the Homestay Parent will communicate in a timely manner when contacted by the College on any matters related to the student's welfare.
- The Homestay Parent will notify the International Student Coordinator two weeks in advance, or as soon as practicable if this is not possible, of any change of circumstances in the household including:
  - i) if the Homestay Parent proposes to materially change the homestay residence in such a way that will affect their ability to meet the homestay residence standards listed above;
  - ii) if the Homestay Parent is temporarily unable to provide accommodation or suitable supervision for periods of holidays or other periods;
  - iii) if the Homestay Parent intends to change address or contact details.
- The Homestay Parent will ensure the student resides in their approved address at all times and notify the International Student Coordinator and the College immediately if the student fails to do so or intends to move.
- The Homestay Parent will meet with the International Student Coordinator as required by the College.

#### **The Homestay Student Responsibilities are:**

- The student is expected to keep his or her own room clean and tidy. Meals are not to be eaten in their room.
- Ironing, dry cleaning and hand washing are the student's responsibility (exceptions may be made in discussion with host parent).
- Student is required to demonstrate due care with linen supplied and any other items or furniture owned by the Homestay Parent.
- Showers must be short and negotiated with Homestay Parents.
- No alcohol or drugs are permitted at any time. Smoking is not allowed in the house.
- If a student wishes to invite a friend for a meal or longer period, this must be organised with the Homestay Parent in advance.
- Students are generally responsible for their own transport to and from school and outside school hours. However, the Homestay Parent will assist whenever possible and agreed in advance.



- If a student wishes to go out in the evening or on the weekend, this must be in agreement with the Homestay Parent. The Homestay Parent must be informed of where the student is going, and return times agreed upon in accordance with the wishes of the student's parents.
- Student is responsible for any significant damage beyond normal wear and tear in the home (e.g. carpet stains etc.) they will be expected to take responsibility for cost incurred (unless such damage is covered by the Homestay Parent's insurance policy).
- Student will not be permitted to sleep at another house unless the Homestay Parent is certain that responsible adult supervision will be provided and the Homestay Parent and International Student Coordinator approves the stay in advance.
- If the student will not be at home for any meal, the Homestay Parent must be notified in advance.
- The student will make sure they turn off all lights after use and be sure door of the home is locked when leaving the residence and when at home if required by the Homestay Parent.
- At the end of the homestay, the student must return any keys issued and / or any items that belong to the Homestay Parent.

**In relation to Homestay, the International Student Coordinators responsibilities are:**

- The International Student Coordinator through partnership with our homestay providers will ensure that all adults residing at any homestay premises have current National Police Checks (or equivalent) and clearances for working with children as required by the appropriate State or Federal regulatory body.
- The International Student Coordinator through partnership with our homestay providers will seek copies of the compliance reports conducted by our providers, of properties in which our students have been placed.
- The International Student Coordinator through partnership with our approved homestay providers will ensure host families have appropriate insurance policy cover for students residing in their home.
- The International Student Coordinator through partnership with our approved homestay providers will ensure there is a 24-hour emergency number that all stakeholders can contact in the event of an emergency.
- The International Student Coordinator through partnership with our approved homestay providers will maintain regular contact with host families, students and College staff as required.
- The International Student Coordinator through partnership with our approved homestay providers will email the students timetables to the Homestay Parents at the beginning of each semester.
- The International Student Coordinator will email the Term Dates, Uniform Policy and Uniform Price List to the Homestay Parents at the beginning of each year.
- The Payment of Homestay money is as follows (and is made directly to our approved homestay providers):
  - i) The student must make a weekly payment to the approved homestay provider
  - ii) When the student is away on holidays the following holding fees must be paid.
  - iii) There is a one-time placement administration cost.
  - iv) Students who require short term Homestay (i.e. School Breaks) will be charged a placement and weekly fee.
- If a student wishes to move from a 'homestay', 2 weeks' notice should be given unless the International Student Coordinator has a reasonable belief that the student's well-being is at risk. If notice given is less than 2 weeks, then 2 weeks' fees are payable from the end of the week of the date that notice is given unless the removal is approved by the International Student Coordinator as being to protect the student's well-being.
- Homestay Parents cannot take responsibility for the student's personal property. Therefore, we suggest that if you have valuable items it would be wise for the student to take appropriate insurance.

- 'Homestay' money does not include personal spending money, for example: entertainment, personal items, clothing. Therefore, the student should have access to a bank account in Australia into which the student's parents can deposit personal spending money.
- Internet usage is charged at a weekly rate.
- Families with whom students are placed, wish the student to become a part of their family. There will therefore be negotiation with the student to ensure the most satisfactory conditions for both parties.
- Students are expected to give proper respect to the host family, to obey their guidelines and fit in with the family routine. They, in turn, will treat the student as they would treat their own child. This will produce harmony and a happy environment.
- If a student continuously disregards the agreed expectations of the Homestay Parents or the College, the College may dismiss the student and return them to their home country at the sole discretion of the Head of Senior School and any 'homestay' money prepaid (maximum 4 weeks) to the host family will not be refunded.
- If a student and host family are not compatible (not as a result of refusal to comply with rules) the College will attempt to find another family for the student. In this situation, host families will continue to host the student until another host family is found.
- Students should always attempt to speak English when they, and their friends, are with the host family.

## Education Agents Policy

### References:

[National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)  
[ESOS Act](#)

Education agents are engaged to formally represent Scotch College Adelaide under the conditions outlined in the following policy. The College responds to all enrolment enquiries and to applications for enrolment according to established procedures.

The currency of the Agent's list on the website will be the responsibility of the Director of Admissions. This list will be reviewed every 3 months, unless changes occur more often. Our Digital Communications Officer will update the website accordingly.

If the College policy, with regard to use of education agents, changes in the future, the School is aware of its obligations under the National Code of Practice for Providers of Education and Training to Overseas Students 2018, and will, at that time, implement appropriate policies, procedures and agreements as required under the National Code.

Scotch College Adelaide's Agents Agreement reinforces Scotch College Adelaide's Education Agents Policy. Education agents are engaged to formally represent Scotch College Adelaide under the following conditions:

- The education agent agrees to comply with the requirements of the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)
- The education agent signs and abides by the conditions of the Scotch College Adelaide's written agency agreement
- The education agent responds appropriately to College monitoring activities and corrective and preventative action, and understands the grounds for termination of agreement as outlined in the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)
- The education agent accurately promotes the services and facilities provided by the College and uses up-to-date marketing materials as supplied by the College on a regular basis.

Scotch College Adelaide 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 that student's study in their principal course with another provider;
- Facilitates the enrolment of a student he/she believes will 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

Scotch College Adelaide may receive a student enrolment application from an education agent on behalf of the parent. As the education agent has not been engaged by the College to formally recruit students on the school's behalf, such an agent would fall outside the scope of [Standard 4](#).

A list of education agents with whom the school has a formal written agreement are listed on the home page of Scotch College Adelaide's website and is readily available to students and regulators.



Information provided about education agents includes at a minimum are agency name, name of principal agent, legal entity of agency and street addresses of agency. The Director of Admissions will review this list every 3 months, unless changes occur more often. Our Digital Communications Officer will update the website accordingly.

### Website List of Education Agents

The list of Education Agents with whom Scotch College Adelaide has a written agreement is posted on the Scotch College Adelaide [website](#).

\*\*The website List of Education Agents was last updated by Carrie Cousar, Director of Admissions on 24/05/2022.

It is the role of the following staff members / department to undertake the following activities regarding education agent management:

Staff Member	Action	When
Director of Admissions	Undertake due diligence	When new agent enquiry is received
Director of Admissions	Keep updated records of written agency agreements and of communications with agents	Written agreements are reviewed annually Operational communications are recorded and filed
Director of Admissions	Keep updated list of agents used (i.e., with whom the school has a formal written agreement) available on or clearly searchable from the school home webpage, and to be able to enter details in PRISMS when prompted.	The Director of Admissions will view the list every 3 months to ensure that it is a true and proper reflection of Scotch College Adelaide's current agent's list
Director of Admissions	Monitor agency activities on a regular basis	Agents are contacted by email for feedback every 6 months Agents are visited <i>as appropriate</i> Agents are otherwise emailed/ called <i>as required</i>
Director of Admissions	Take corrective or preventative action, or terminate agreements	As required
Director of Admissions	Provide agent access to updated and accurate marketing materials and school information	Updated materials are posted/sent electronically annually. Updated fees lists are provided <i>in December every year</i>

See Section 3. **Checklist for Marketing Information and Practices** above for list of marketing materials.

The following staff member is responsible for reviewing and updating the Policy on Education Agents and related administrative documents:	
<i>Director of Admissions</i>	<i>Carrie Cousar</i>

This policy should be checked and updated whenever there is a change in regulations about [Standard 4](#), or in Department of Home Affairs regulations about activities of education agents, or when existing School policies need to be adapted or strengthened. An update of our marketing materials will be sent to our agents annually and the agents will be advised to destroy all previous marketing material related to the College.

## Processes for Monitoring Activities of Education Agents

### References:

#### National Code of Practice for Providers of Education and Training to Overseas Students 2018

Scotch College Adelaide practices due diligence in responding to agent enquiries by requesting comprehensive information about the agency and references from reputable sources. Agents with whom Scotch College Adelaide has a formal written agreement are listed on the home page of the school website.

Prospective agents are requested to provide as much of the following information as is possible:

- Company profile:
  - Details of Principal's background and qualifications
  - Number of staff
  - Details of key staff members and/or school consultants
  - Number of years in existence
  - Services provided by the company
  - Location and details of offshore offices
  - Location and details of sub-contractors
  - Location and details of any off-shore partners
- Company registration details
- Details of past and present experience recruiting students:
  - For Australian schools
  - Number of students
- Familiarity with Australian education industry:
  - Knowledge of ESOS Act
  - Knowledge of National Code
- Experience in:
  - Education industry generally
  - Any other major business areas
- Details of markets from which recruit:
  - Geographical area
  - Characteristics of potential market
- Names of any professional organisations of which the agent is a member

- Outline of services to be provided
- Written references, dated and with contact details from two sources:
  - An Australian Government Officer or Agency
  - An Australian school
  - A referee of the agent's choice

Agent activities are monitored on a regular basis through tracking of the following:

- Number of enquiries overall
- Ways enquiries are followed up
- Reasons applications were not lodged following an enquiry
- Number of applications lodged overall
- Number of applications accepted
- Reasons applications were rejected
- Timelines for:
  - date of enquiry
  - lodgement of application
  - application decision
  - receipt of commission invoice
  - payment of commission

## Critical Incident Policy & Procedures

### Policy

***This document is written to support leaders in their responsibilities in relation to the management of crises, prevention, preparation, response and recovery.***

For the purpose of this document the terms crisis, critical incident and emergency are interchangeable.

### Scope

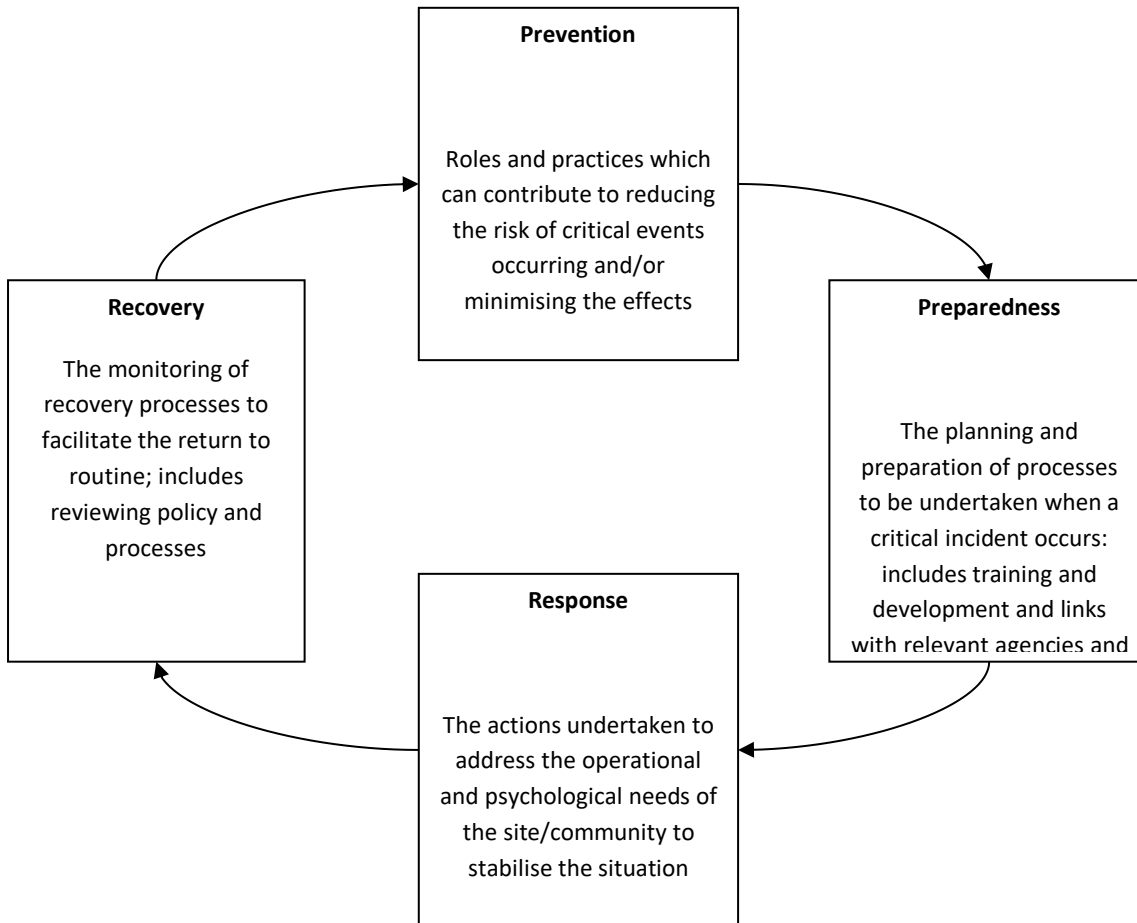
The Critical Incident Response will be initiated when there is a sudden or unexpected event (or series of events), or chronic or accumulative events which warrant the response. Critical incidents can affect the wellbeing of students, staff or the community and are disruptive to organizational control.

This policy addresses response and recovery following a critical incident. Prevention and Preparedness are dealt with in the Scotch College Risk Management Policy.

Each critical incident is unique, the aim of this Procedure is to provide a general framework to be followed at each campus or location in which a critical incident occurs. Staff must ensure that while compliance with the Policy is expected, the safety of those involved in the incident is paramount.

A Critical Incident Response will be initiated by the Principal or their delegate.

## Critical Incident: A Framework for Policy and Practice



## **Prevention**

Prevention is the identification of risks that can arise in the school community and the development of policies and procedures that can contribute to reducing the risk of critical events occurring and/or minimising the effects.

## **Preparedness**

Preparedness is the planning and preparation of processes to be undertaken when a critical incident occurs. This includes training and development and links with relevant agencies and personnel.

It also includes the development of emergency procedures which describe actions to be taken during and following an emergency to ensure the safety of students, staff and visitors.

## **Response**

Response is the action undertaken by the organization to stabilise the situation. It is the series of actions that are implemented when a Critical Incident is declared by the Principal or their delegate and lasts until the Critical Incident risk is declared by the Principal or delegate to be stabilized.

See Response and Recovery Checklist p. 6

## **Critical Incident Team**

The response may include convening the Critical Incident Team. The composition of this team will vary according to the nature of the incident. Recommended members of the team will include:

- Principal
- Relevant Head of School
- Chief Operating Officer
- And any other resources as required

Once a CI team is chosen and assembled, a full appreciation of conflicts of interest should be formally declared and noted.

## **Recovery**

Recovery includes reviewing policy and procedures and facilitating the return to routine. Recovery management is most effective when there is recognition of the complex, dynamic and sometimes protracted nature of recovery processes and the changing needs of affected individuals and groups within the community. Leaders need to consider their own well-being and seek support and debriefing as appropriate.

## COMMUNICATION TREE

In the event of a crisis, a communication tree will be activated, to ensure full communication within staff ranks. The calls will cascade down reporting lines. Managers should ensure that the mobile numbers of direct reports are kept within their mobile phone.

COO	HR	Head of TP	Head of MC	Dir of T & L	Chair of Council	Dir of Philanthropy	Dir of ELC
Business Operations Manager	HR Team	Heads of Boarding	Asst Head of Campus	Heads of Faculty	Council members		ELC Staff
Director of Admissions	Enrolments team						
Finance Manager	Medical Clinic	Head of Mid Sch MS Secretary Year 7 staff Learning Strategies Coordinator Yalari Coordinator	Teaching Team	TP Teaching Staff	Foundation if relevant  Committee members if relevant		
Kitchen Manager	<i>EAP Access</i>	SS Secretary	Non teaching staff				
Community & Marketing/ICT Manager		Dir Student Wellbeing  Psychologists  Heads of House					

## Response and Recovery checklist

Considerations	Responsibility
At Impact: Physical and Psychological Safety	
<ul style="list-style-type: none"> <li>Ensure safety of all personnel</li> <li>Account for all personnel</li> <li>Send for emergency support (the decision to cease emergency procedures rests with the emergency services personnel, in consultation with College Principal or delegate )</li> </ul>	
<b>Response</b>	
<p>Stop and Think</p> <ul style="list-style-type: none"> <li>Keep calm</li> <li>Issue clear instructions</li> <li>Scan relevant documents (Crisis Incident; Emergency Response Procedures; Be You Suicide Response Plan <a href="https://scotchsa.sharepoint.com/:b:/g/WellbeingAdmin/EaMSDYJ9oq9IkE_mEaMR0ygB2r8S2RwiilzHSbFSgo_VTg;DataBreach%20see%20Appendix%201">https://scotchsa.sharepoint.com/:b:/g/WellbeingAdmin/EaMSDYJ9oq9IkE_mEaMR0ygB2r8S2RwiilzHSbFSgo_VTg;DataBreach see Appendix 1</a>)</li> <li>Send for back-up</li> <li>Advise Principal/delegate who will provide leadership for response and recovery</li> <li>Do not communicate, or attribute liability</li> </ul> <hr/> <p><b>Convene Critical Incident Team</b></p> <ul style="list-style-type: none"> <li>Identify the members of the CI Team</li> <li>Contact the CI Team and convene a meeting</li> <li>Have relevant documents in hand. Relevant documents are available in CareMonkey and O365</li> <li>Establish a management plan</li> <li>Consider plan for short, medium and long term response</li> <li>Allocate roles and responsibilities</li> </ul> <p>Collect Information directly from Reliable Sources</p> <hr/> <p><b>Assess the Situation</b></p> <ul style="list-style-type: none"> <li>Who is likely to be affected and how</li> </ul>	



- Need for support/emergency personnel e.g., relief staff
- How will situation/individuals be monitored
- Tasks to be undertaken and by whom

#### **Communication**

- Speak with one voice – direct communication through nominated person/s
- What needs to be communicated, to whom, by whom, when and how (NB: Only police are able to release information about fatalities)
- Clarify communication liaison for emergency services personnel and communications centre if appropriate
- Clarify communication links for information coordination and dissemination (see Communication Tree)
- Identify recording processes to assist in keeping track of personnel/student needs, subsequent interventions and decisions made

#### **Communication: Staff**

- Provide facts; if information is unavailable/withheld, it is important that this is stated and why
- Allocate Office 365 folder for information updates
- Outline proposed management plan
- Consider personnel not present when information disseminated
- Provide information to enable staff to support students
- Provide information about support for staff
- Provide opportunities for staff to contribute information/concerns
- Work with office staff to ensure consistent approach to release of information

#### **Communication: Insurance**

- Advise insurance company

#### **Communication: Students**

- Consider how to be informed and by whom
- Provide facts; if information is unavailable/withheld, it is important that this is stated and why
- Consider that students may be affected even if they do not know the people directly involved
- Plan for a range of student responses
- Assist students to identify support they need

- Provide information about support available; use familiar avenues wherever possible
- Identify absent students for follow up by HOH, Home Group Teacher or College Counsellor

#### Communication: Parents

- Determine nature and content
- Provide facts and continue to update parents about the College's management plan
- Consider other school volunteers
- Provide information about reactions students may experience and how best to respond
- Provide information on sources of support

#### Communication: Media

- Develop a strategy to respond to media requests for information
- The media should not have information that is different to that provided to the College community
- Identify a site media contact person and ensure they have clear guidelines on media contact with staff or students
- Contact Hughes PR re media monitoring.

#### Psychological Well-Being

- Provide environment where staff/students can safely express their thoughts and feelings e.g., special morning tea, flexible working arrangements
- Consider how students/staff can be linked with significant others to re-establish sense of personal control
- Consider allocating place for flowers, photos, messages if appropriate
- Ensure ongoing monitoring of individuals/groups
- Immediate and/or ongoing support needs to be readily available
- Consider relief staffing
- Consider possible responses to crisis

#### Other Tasks

- Attend to deceased person's locker, change class lists if appropriate
- Consider family visitation

<ul style="list-style-type: none"> <li>Processes for student movement, gathering areas, parent meeting space</li> <li>Timetable adjustment, yard duty</li> <li>Relocation of work areas e.g., in the case of fire-damage</li> <li>Identify recording processes to assist in keeping track of personnel/student needs, subsequent interventions, decisions made and actions taken</li> </ul> <p><b>Personnel and Agencies to Consult</b></p> <ul style="list-style-type: none"> <li>Police, Emergency Services</li> <li>Medical services, Assessment and Crisis Intervention (for mental disorder)</li> <li>Colleague Principal</li> <li>Legislation and Legal Services</li> <li>Media Liaison</li> <li>ACCESS</li> <li>Support services</li> </ul> <p><b>End of First Day Checklist</b></p> <ul style="list-style-type: none"> <li>Will the school be open tomorrow? School community has information on the event and management plan</li> <li>People have support contacts and/or helpful information on managing stress and emotional reactions</li> <li>Critical Incident Team has regrouped and debriefed the day, modified ongoing plan</li> <li>Ensure all information and actions have been recorded, captured and archived</li> <li>ELC must report to EECRSB an online report within 24 hours</li> <li>Continue to adapt and apply the CI management plan until the crisis is declared to be over</li> <li>Continue to follow the first of end day checklist.</li> </ul>	
<b>Recovery</b>	
<p><b>Restore College to a Regular Routine</b></p> <ul style="list-style-type: none"> <li>Provide regular, updated information</li> <li>Staff will be better equipped to handle students if they are well informed and have had opportunities to raise concerns and questions</li> <li>Allow flexibility as some staff/students may be unable to return to normal duties/routines</li> <li>Assist staff to create a safe, ordered environment</li> <li>Maintain supportive environment and monitor individuals/groups for signs of distress</li> </ul>	

<p><b>Funerals, Memorials, Anniversaries etc</b></p> <ul style="list-style-type: none"> <li>• Consider staff/student attendance at a funeral</li> <li>• Consider rituals, ceremonies, memorials and include staff/students/parents in discussions as appropriate</li> <li>• Support may be needed at the anniversary of the event</li> </ul> <p><b>Inquests and Legal Proceedings</b></p> <ul style="list-style-type: none"> <li>• Seek legal advice if staff required to give evidence in legal proceedings</li> <li>• If Coroner's Inquiry is to take place, a social worker at the Coroner's Court can prepare staff</li> </ul>	
<p><b>Review</b></p>	
<p><b>Promote Organisational Learning with Operational Debrief. Consider:</b></p> <ul style="list-style-type: none"> <li>• Operational issues e.g., review of policies and procedures</li> <li>• Curriculum e.g., developing resiliency</li> <li>• Consider strengthening partnerships with families, support services</li> <li>• Consider staff professional development e.g., managing stress</li> </ul> <p><b>Subsequent Incidents</b></p> <ul style="list-style-type: none"> <li>• A subsequent crisis may have a stronger than normal impact on the College and individuals.</li> <li>• Recognise the potential for cumulative stress.</li> </ul> <p><b>Record Keeping</b></p> <ul style="list-style-type: none"> <li>• All records (emails; documents) are to be kept in a central repository, maintained by the Principal's Personal Assistant.</li> <li>• In order to maintain privacy and ensure the completeness of files, CI team members are to ensure that all documents are cc'd to the Principal's PA.</li> <li>• No CI team member is to retain copies of documents or emails once they have been referred to the Principal's PA</li> </ul>	

## RESOURCES

### 24-Hour Services:

#### Assistance and Essential Services

AISSA	8179 1400
Ambulance, Fire & Police	000 (for life threatening or time critical emergency)
Australian Search & Rescue	
Maritime	1800 641 792
Police Assistance (non urgent)	13 14 44
State Emergency Service	13 25 00

#### Utilities

SA Power Network	13 13 66
SA Water	1300 883 121
Gas (Origin Energy)	13 24 61

#### Community & Information Services

Interpreting Services	1800 280 203
Poisons Information Centre	13 11 26

#### Help & Support Services

Child Abuse Report Line	13 14 78
Crisis Care Unit	13 16 11 (M-F 1600 – 0900, W/ends, P/Hols. 24 hr)
Mental Health (emergency crisis)	13 14 65
Rape & Sexual Assault Service	8226 8777 or 1800 817 421
Headspace	0448 359 963
Be You Suicide Consultant	0448 381 280

#### Other

Victim Support Service Inc	1800 842 846
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#### Local Services

Families SA	8226 7000
CAMHS (Child & Adol.Mental Hlth)	8204 5484 (Flinders Med. Centre) 7425 8600 (Marion)
Child & Family Health Centres	1300 364 100

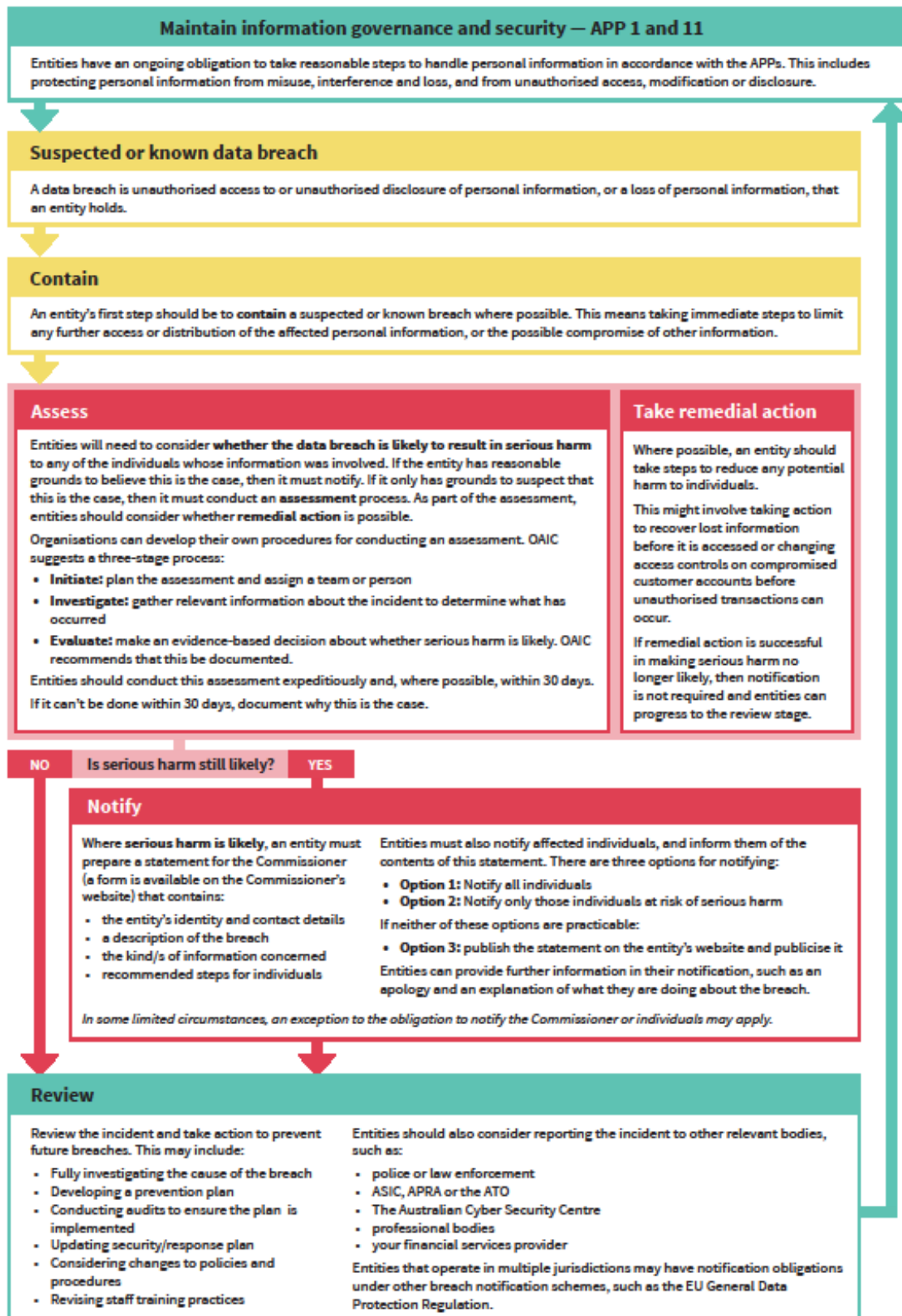
Appendix: **Immediate Response Procedure for Critical Incident**

<b>Phase 1: Convene CI Team</b>	
<ul style="list-style-type: none"> <li>- Advise Principal/delegate who will provide leadership for response and recovery</li> <li>- Identify CI team and convene meeting (MC – HoMC office / TPC – Senior School office)</li> <li>- Alert members of SLT who are NOT part of CI team that a CI has been called, and alert to standby for instruction or update</li> <li>- Direct all unrelated enquiries to another office in the school</li> <li>- Identify relevant documents and bring to hand (CI Policy)</li> <li>- Identify roles and responsibilities, which as a minimum must include; Principal (or delegate) Scribe (nominated member of admin team - Principal's PA preferred), SLT member to manage Campus, Communications (internal and/or external)</li> <li>- Identify any conflict of interest within CI team – excuse parties as needed</li> <li>- Summarise early facts known about incident</li> <li>- <b>STOP:</b> <ul style="list-style-type: none"> <li>- <b>Check wellbeing of CI team, and any parties excused.</b></li> <li>- <b>Allocate person responsible to manage campus to check wellbeing of staff / students who need immediate support (recipient of phone call, witnesses etc.)</b></li> </ul> </li> </ul>	
<b>Phase 2: Assess the Situation &amp; Plan Response</b>	
<ul style="list-style-type: none"> <li>- Identify personnel / buildings / resources likely to be directly affected (siblings, children of staff / parents of students, parents of students directly involved) – isolate those who require immediate attention and/or plan for closure of impacted area</li> <li>- Identify information that needs to be obtained (student contact information, staff contact information, Risk Assessment for event)</li> <li>- <b>Check for updates to situation</b></li> <li>- Identify plan for immediate management of situation – this needs to consider;             <ol style="list-style-type: none"> <li>1. Communication</li> <li>2. Responses to communication (ensure Social Media accounts are monitored and Hughes PR are alerted, if needed)</li> <li>3. Need for immediate support or changes to structure - personnel, support staff, collapsed classes etc.</li> <li>4. Securing Campus and protecting staff/students from the media</li> </ol> </li> </ul>	

<p>5. Gathering place for parents/community members coming to Campus, or evacuation point off campus (dependent on incident)</p> <p><b>STOP: Check wellbeing of CI Team.</b></p>	
<b>Phase 3: Prepare Communication</b>	
<ul style="list-style-type: none"> <li>- Identify who needs to be told what. Priority of communication should be: <ul style="list-style-type: none"> <li>o Key staff who will need to have a role in communication to others (Psychologists, HoH, SLT member managing Campus, all members of SLT) – email or phone call</li> <li>o Families of those immediately impacted (parents of students, partners/emergency contacts of staff) – phone calls preferred,</li> <li>o Staff – email preferred OR activate phone tree if out of hours</li> <li>o Campus – Staff and Students – briefing preferred using evacuation procedure to gather campus</li> <li>o Wider community (inc. statement to media and ACCESS) – consider use of SMS, email, facebook etc.</li> </ul> </li> <li>- Obtain sample scripts for internal and external communications</li> </ul> <p><b>STOP: Check for updates to situation</b></p> <p><b>STOP: Check wellbeing of CI team, check wellbeing of staff and students.</b></p>	
<b>Phase 4: Enact Management Plan and Communicate</b>	
<ul style="list-style-type: none"> <li>- Enact Management plan</li> <li>- Proceed with communications</li> <li>- <b>Cross check actions taken with CI Policy and refer to 'End of First Day' Checklist</b></li> </ul> <p><b>STOP: Check wellbeing of CI team</b></p>	



## Appendix 1 - Data Breach





## Monitoring Course Duration, Progress and Attendance, and Completion Within Expected Duration

### References:

National Code of Practice for Providers of Education and Training to Overseas Students 2018

ESOS Act

ESOS Regulations

It is required under the National Code 2018 that Scotch College Adelaide must:

- a. monitor the enrolment load of students to ensure they complete the course within the duration specified in their CoE and do not exceed the allowable portion of online or distance learning, and ensure that any extensions granted to duration of study comply with conditions under Standard 9;
- b. systematically monitor students' course progress and attendance;
- c. be proactive in notifying and counselling students at risk of failing to meet require course progress and / or attendance requirements; and
- d. notify students assessed as not meeting satisfactory course progress or attendance requirements in writing of the school's intention to report them and advising students they have 20 working days in which to access the school's complaints and appeals process.

NB: Further information is available on processes for handling complaints and appeals and timelines for reporting of students via the website of the [Overseas Students Ombudsman](#).

- e. report students who have breached course progress and / or attendance requirements under Section 19 of the ESOS Act, even if the student cancels enrolment after being notified of the school's intention to report breach of visa condition under [Standard 8](#).
- f. meet any necessary refund and reporting obligations in event of a cancellation of student enrolment as a consequence of requirements under [Standard 8](#).

Scotch College Adelaide's Course Progress and Attendance Process combines all requirements in the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) .

When a student is identified at risk of not meeting course progress requirements, one or more of the following intervention strategies will be activated by depending on the year level and support needs of the student:

Strategy	Contact for Junior School students	Contact for Middle School students	Contact for Senior School students
<i>Subject tutorial support in class time</i>	Subject Teacher	Subject Teacher	Subject Teacher
<i>After hours tutorial support</i>	As required	Boarding House Staff	Boarding House Staff
<i>Mentoring</i>	Class Teacher	House Mentor	House Mentor
<i>Additional ESL support</i>	ESL Teacher	ESL Teacher	ESL Teacher
<i>Change of subject selection, or reducing course load (without affecting course duration)</i>	Year Level Coordinator	Head of Teaching and Learning	Head of Teaching and Learning
<i>Counselling -academic skills</i>	Student Support Services	Student Support Services	Student Support Services
<i>Counselling – time management</i>	Student Support Services	Student Support Services	Student Support Services
<i>Counselling - personal</i>	College Psychologists and/or DoSW	College Psychologists and/or DoSW	College Psychologists and/or DoSW

Information about compliance with student visa conditions is provided to School staff and to students in these ways: *on website, in enrolment information package, staff induction, International Student Handbook*

Information about School policy requirements, intervention and support processes is provided to students and staff in the following ways: *on website, in enrolment information package, staff induction, International Student Handbook*

To achieve satisfactory attendance at Scotch College Adelaide a student must:

- Satisfactory course attendance is attendance of 80% of scheduled course contact hours

When a student is identified at risk of not meeting attendance requirements, one or more of the following intervention strategies will be activated by the *International Student Coordinator* depending on the year level and support needs of the student:

Strategy	Contact for Junior School students	Contact for Middle School students	Contact for Senior School students
<i>Counselling -academic skills</i>	Student Support Services	Student Support Services	Student Support Services
<i>Counselling – time management</i>	Student Support Services	Student Support Services	Student Support Services
<i>Counselling - personal</i>	College Psychologists and/or DoSW	College Psychologists and/or DoSW	College Psychologists and/or DoSW
<i>Seeking medical opinion</i>	School Nurse	School Nurse	School Nurse
<i>Interview with accommodation provider</i>	Boarding Staff International Student Coordinator	Boarding Staff International Student Coordinator	Boarding Staff International Student Coordinator
<i>Change of subject selection, or reducing course load (without affecting course duration)</i>	N/A	Head of Middle School	Head of Teaching and Learning

Information about compliance with student visa conditions is provided to School staff and to students in these ways: *Staff induction International Student Handbook*

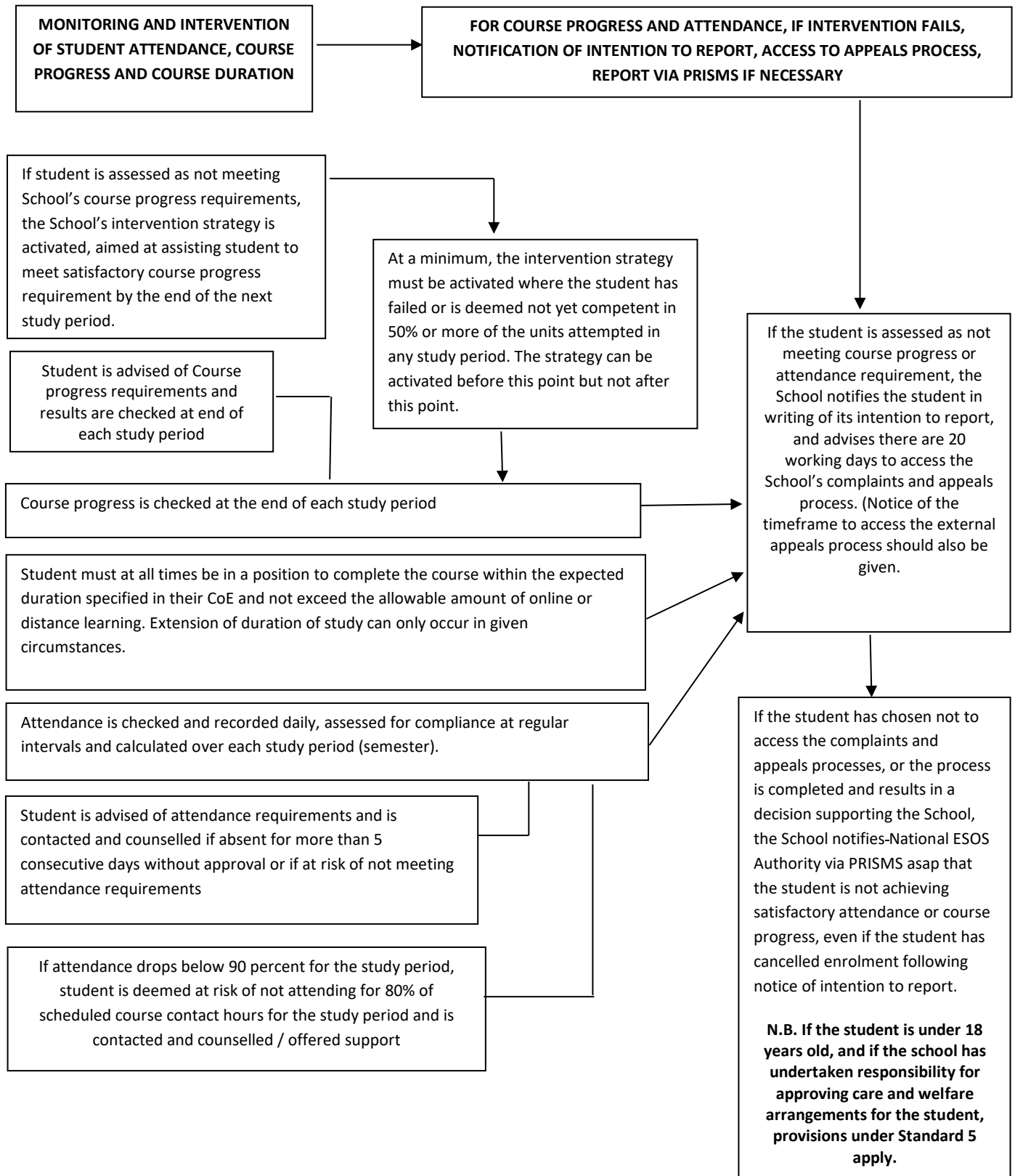
Information about School policy requirements, intervention and support processes is provided to students and staff in the following ways: *Staff induction International Student Handbook*

Administrative documents relating to the School's policies and procedures related to course progress and attendance, including monitoring, intervention and reporting instances of non-compliance are:

- Overseas student Referral Form for Intervention
- Letter of intention to report for unsatisfactory course progress
- Letter of intention to report for unsatisfactory attendance

See below for copies of these documents

## Diagrammatic Overview of School Monitoring Activities



## Student Attendance Policy

As a College we are committed to educational excellence. The College aims to provide an educational offering that is engaging and able to meet the learning needs of students.

We understand students need to maximise attendance at school to gain optimum benefit from their education. Ensuring regular attendance at school is a shared responsibility between students, parents/caregivers and the College.

### Policy outcomes

Implementation of this policy will result in the following outcomes:

- Maximum student engagement reflected in students' attendance and participation, as shown in the data collected
- Improvement in learning outcomes as measured by the College and system assessment processes
- Increased understanding of the importance of regular attendance by the community of educators, learners and families of the College
- Ongoing analysis of attendance data is conducted which informs the College's policy and procedure
- Procedures based on the analysis of qualitative and quantitative data to improve attendance are consistently implemented and monitored

### Attendance guidelines

Satisfactory course attendance is attendance of 80% of scheduled course contact hours. Student attendance is:

- checked and recorded daily
- assessed regularly
- recorded and calculated over each semester.

Late arrival at College will be recorded and will be included in attendance calculations. Any period of exclusion from class will not be included in student attendance calculations.

Any planned absence from school for more than two days must be approved by the relevant Head of School. A request should be made in writing at least two weeks prior to the planned absence, wherever possible. Any unexplained absence for more than two consecutive days will be investigated by the Head of House or Homegroup Teacher.

On Torrens Park Campus, any medical absence for more than two days should be accompanied by a medical certificate.

On Mitcham Campus, an absence of 2 weeks or more, is documented via a 'Principal Approved Application for Exemption From School Enrolment/Attendance And Education Enrolment/Participation' form and kept on file by the school.

More frequent absence will be categorised in accordance with Department for Education definitions of non-attendance;

- Habitual non-attendance where a student has 5 to 9 absences for any reason in a term (average of 1 day per fortnight).
- Chronic non-attendance where a student is absent for 10 days or more in a term for any reason (average of 1 day per week)

In cases of habitual or chronic non-attendance, the Head of House or Home Group Teacher will work with the Head of School and the student's family to develop a plan to support the student to more frequently attend school. Once they are reengaged, attendance will be monitored and the attendance support plan reviewed weekly until non-attendance has ceased.

Where a student has been absent from school for more than six consecutive weeks, despite efforts made to put attendance support in place, support will be sought from the Department for Education Attendance and Engagement Social Work team.

### **Full Fee Paying Overseas Students**

It is a visa condition that a Full Fee Paying Overseas Student attend a minimum of 80% of scheduled course contact hours. Attendance will be monitored in accordance Scotch College Adelaide Attendance Guidelines.

If the attendance of an Overseas student falls below 90%, the Head of House or Home Group Teacher and International Student Coordinator will be advised. An Attendance Support plan will be put in place and reviewed weekly.

If student attendance fails to improve despite support in place, and the student reaches the attendance threshold for a study period, Scotch College Adelaide will advise the student of its intention to report the student for breach of visa condition 8202. From this point, the student has 20 working days in which to access the College's internal complaints and appeals process.

The College will report to the regulatory ESOS authority in PRISMS that the student has not achieved satisfactory course attendance as soon as practicable where;

- the student does not access the complaints and appeals process within 20 days
- the student withdraws from the complaints and appeals process
- the complaints and appeals process results in a decision for the College.

Students will not be reported for failing to meet the 80% threshold where:

- the student produces documentary evidence clearly demonstrating compassionate or compelling circumstances that have impacted attendance e.g., medical illness supported by a medical certificate

If the student does not obtain a suspension of studies under the Scotch College Adelaide's Deferment, Suspension and Cancellation Policy, and falls below the 80% threshold for attendance, the process for reporting the student for unsatisfactory attendance (breach of visa condition 8202) will occur.

Scotch College Adelaide will not deliver a course exclusively by online or distance learning to an overseas student. The College can provide online or distance learning, which will be in addition to the minimum face to face teaching requirements approved by the relevant designated state authority or ESOS agency as part of the College's registration.

## Policy Implementation

Responsibilities:

Who	What	Frequency
Junior, Middle and Senior School administration staff	Collection of attendance data through Seqta	Daily
Junior, Middle and Senior School administration staff	Follow up non-attendance	Daily
Junior, Middle and Senior School administration staff	Alert Home Group Teacher R-7 or Head of House 8 -12 of any unresolved (unexplained) absence	Daily
Junior, Middle and Senior School administration staff	Provision of attendance data to Heads of House for students in year 8 - 12	Weekly
Home Group Teacher R-7 or Head of House 8 -12	Monitoring of student attendance	Weekly
Home Group Teacher R-7 or Head of House 8 -12	Identification of unsatisfactory attendance (<80%) & Report to Head of School	As identified
Home Group Teacher R-7 or Head of House 8 -12 with support of Head of Campus or Head of School*	Work with family to identify reasons for non-attendance. Development of attendance support plan.	
Home Group Teacher R-7 or Head of House 8 -12	Review of attendance support plan	Weekly

\*The Director of Student Wellbeing, International Student Coordinator or College Psychologists may be required in the development of an Attendance Support plan and will be required to support or lead the development of a plan, at the request of a Head of Campus or Head of School.



**The Head of Campus and/or Assistant Head of Campus will:**

- Monitor the development, documentation and implementation of Student Support Plans for Attendance as agreed upon by the student, their Head of House and/or College Psychologists and/or Director of Student Wellbeing and/or International Student Coordinator and Parent/Caregiver or local guardian.
- Ensure the maintenance of attendance records through the College Learning Management System
- Monitor and analyse attendance data and report to the College community through the site's annual report
- Ensure procedures, including parent/caregiver notification and at times home visits are in place to follow up non-attendance
- Ensure intervention occurs after 10 days of accumulated absence or sooner if the child or student has a poor attendance record
- Make referral to, and seek support from, agencies and support services when a learner's pattern of attendance becomes irregular through the Director of Student Wellbeing
- Ensure that the analysis of data is used effectively to inform action taken in response to student absenteeism
- Ensure that notifications about suspicions of neglect and/abuse are made under Mandatory Reporting Guidelines
- Approve applications for exemption from attendance at school
- Inform the Principal of students identified to be at high risk regarding attendance.

**The Director of Student Wellbeing (DSW), Head of House (Torrens Park) and College Psychologists will:**

- DSW leads the College Psychologist and TP Heads of House team, which includes the maintenance of up to date and accurate data collection re attendance, including the use of this team to support students who are at risk of not attending school.
- DSW supports students by monitoring and improving attendance through a documented plan for the student in conjunction with the Head of House and or College Psychologists.
- DSW works with the TP Head of House and College Psychologists to support improved attendance for identified students and their parents/caregivers
- TP Head of House Identifies reasons for non-attendance and develop and document all strategies to improve attendance
- TP Head of House develops and implements special projects to meet the needs of students at risk through non-attendance
- TP Heads of House inform parents/caregivers of their legal responsibilities in relation to attendance and possible implications of non-compliance
- DSW and College Psychologists implement the interagency support for students considered at risk.

**College staff will:**

Staff of the College are responsible for supporting the agreed attendance improvement processes for the site and will:

- Provide a relevant and dynamic learning program that seeks to engage all children and students and offers opportunity for success, thus encouraging regular attendance
- Record attendances/absences according to College requirements
- Contribute to the analysis of attendance trends and the development and implementation of School Support Plans for Attendance
- Implement school procedures, including parent/caregiver notification, to follow up non-attendance
- Work with TP Heads of House to support learners' regular attendance in the education program



- Refer all students, under compulsion, with unsatisfactory attendance to the College if the actions above have proved unsuccessful
- Make Mandatory Notifications as appropriate, document and store as per College procedures

**NOTE:** While it is acknowledged that children are not under compulsion to attend school until their sixth birthday, staff work with parents/caregivers to establish a regular attendance pattern as early as possible.

### **Parents/caregivers will:**

Parents/caregivers must enrol their child in an education program from 6 years (the age of compulsion). When they enrol their child at Scotch College Adelaide, they accept the responsibility to:

- Provide information to the College that may assist planning for the child's learning; for example, medical conditions, developmental milestones and family issues
- Enable their child to attend punctually and regularly on every day our education program is offered and to comply with the education program being offered
- Provide an explanation to the College whenever their child is absent. Apply for an exemption whenever their child is removed from the school with no provision of evidence that their learning will be with another school
- Work with the College on intervention strategies to improve attendance
- Discuss with the Head of Campus any suspicions of neglect and/or abuse that may require a mandatory notification.

### **Students will:**

Students enrolled at Scotch have responsibility for their attendance. The level of responsibility will be determined by the individual circumstances and age of the child.

The expectations are that they:

- Attend school or other educational programs as negotiated regularly on every day the program is offered
- Be punctual in arriving at school or the educational program and for all associated lessons and activities
- Engage appropriately in the education program as expected.

### **Attendance Support Plan**

An attendance support plan will be generated in Seqta as an *Attendance Plan*. The plan will document:

Panel members (including any of the following; student, parent(s), local guardian, Yalari support officer, local caregiver and any identified school staff)

- Reasons for non-attendance
- Agreed strategies for supporting attendance
- Review cycle
- Notes and adjustments from review meetings.

## Course Progress Monitoring Procedure

### Course Progress

- Scotch College Adelaide will monitor, record and assess the course progress of each student for the course in which the student is currently enrolled.
- The course progress of all students will be assessed at the end of each semester of enrolment.
- Students who have begun part way through a semester will be assessed after one full period of attendance.
- To demonstrate satisfactory course progress in Senior Secondary, students will need to achieve competency at least at 'C' grade level or above in at least 10 units, two of which must be English or ESL.
- If a student does not achieve competency in at least 90% of units studied in an assessment period, the International Student Coordinator will meet with the student to develop an intervention strategy for academic improvement. This may include:
  - additional supervised study periods;
  - tutorial assistance;
  - other intervention strategies as deemed necessary.
- A copy of the student's individual strategy and progress reports in achieving improvement will be forwarded to parents.
- The student's individual strategy for academic improvement will be monitored over the following semester by International Student Coordinator and records of student response to the strategy will be kept.
- If the student does not improve sufficiently academically and achieve satisfactory course progress by the end of the next assessment period, Scotch College Adelaide will advise the student in writing of its intention to report the student for breach of visa condition 8202, and that he/she has 20 working days in which to access the College's internal complaints and appeals process.
- The College will notify DEST via PRISMS of the student not achieving satisfactory course progress as soon as practicable where:
  - the student does not access the complaints and appeals process within 20 days; or
  - withdraws from the complaints and appeals process; or
  - the complaints and appeals process results in favour of the College.

### Completion within expected duration of study (course progression)

- As noted above, the College 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 College will only extend the duration of the student's study where the student will not complete their course within the expected duration due to:
  - compassionate or compelling circumstances;
  - student participation in an intervention strategy as outlined above;

- an approved deferment or suspension of study has been granted in accordance with Scotch College Adelaide's Enrolment Agreement, which stipulates grounds for deferment of study. OR Scotch College Adelaide's Deferment, Suspension and Cancellation Process.
- Where the College decides to extend the duration of the student's study, the College will report via PRISMS and/or issue a new CoE if required.

## Intervention Strategy for Full Fee Paying Overseas Students (FFPOS)

### Purpose

This document provides direction as to how Scotch College Adelaide staff will manage students who are at risk of breaching their academic visa requirements or are deemed at risk of not making satisfactory course progress. It is the practice of Scotch College Adelaide to provide a safe and effective learning environment with practical support mechanisms to ensure all students successfully achieve their qualifications in compliance with SACE and CRICOS. This strategy covers all FFPOS of Scotch College Adelaide.

### Definitions

*"Intervention Strategy"*: a negotiated and monitored plan that incorporates internal and/or external support options to ensure the successful completion of the course.

*"FFPOS"*: Full Fee Paying Overseas Student.

### Intervention Strategy

Intervention occurs as soon as a student is identified as being at risk of not successfully completing the course/qualification due to:

- Unsatisfactory attendance (a minimum of 80% of contact hours must be maintained), and any drop below 90% must be followed up by the International Student Coordinator;
- Unsatisfactory academic progress (not successfully completing or demonstrating competency in more than 50% of the course requirements in that Term or Semester);
- Behavioural issues;
- Personal or external issues affecting the student's capacity to achieve.

### Procedure

If a student is at risk of not making satisfactory course progress through either attendance or academic progress or personal issues, the International Students Coordinator will in consultation with the Head of House/Head of Campus discuss the applicable issues with the student. Depending on the outcome of those preliminary discussions, the International Student Coordinator will in consultation with the Head of House/Head of Campus establish an individual support program which may include one or more of the following:

- Academic skills support;
- Tutorial or study groups;
- Individual case management, coaching or mentoring;
- Referral to counselling services/career services;
- Placement in a suitable alternative course;
- A reduction in course load where possible;
- Referral to relevant external specialist assistance;
- Other.

A record of counselling, assistance and intervention measures is to be kept up to date in the student's file.

- In the first instance of violation, a verbal warning will be given to the student.
- In the second instance, the student will be notified in writing of the breach of rules and this will be filed in the student's file.
- In the third instance, contact is made with the parents, notifying them of the situation and the contract to follow.
- If the student does not work towards rectifying the breach of rules, after having been given adequate time and opportunity to do so, the student may be reported to PRISM through the Director of Admissions for

breach of visa conditions, which may result in cancellation of their visa, depending on the outcome of any appeals process.

**Note:** *The student must be notified in writing of intent to report.*

An attempt at intervention **MUST** be made after each warning letter is sent to the student for any of the following reasons:

- In danger of not meeting academic progress requirements;
- In danger of not meeting course attendance requirements;
- At risk of having their enrolment cancelled (expulsion) based on behavioural issues or breaches of Student Code of Conduct.

**Note:** *The student must be given adequate time to rectify their situation before further action is taken.*

### **Student Responsibility**

A student requiring assistance in any matter should contact the International Student Coordinator, their Mentor teacher or their Head of House, depending on whom they feel most comfortable with.

It is the responsibility of the Student to:

- Advise Scotch College Adelaide if they have issues which will/are affecting their capacity to succeed and meet academic visa requirements;
- Ask for support/help.

### **Staff Responsibility**

If other Scotch College Adelaide staff identifies an issue related to a student, they should advise the International Student Coordinator/Head of House/Head of School/Director of Boarding through a Report of Concern documented on Scotch College Adelaide's learning management system.

It is the responsibility of all Scotch College Adelaide staff to promptly act once the need for intervention has been identified or is suspected.

### **Strategy for Attendance Issue**

In line with the Intervention Strategy, the International Student Coordinator is charged with the responsibility of identifying the cause of the poor attendance through conversation with the student and parent/guardian if a minor child;

- Negotiating and documenting an appropriate intervention/assistance plan with specified timeframes and outcomes;
- Monitoring the success of the outcomes; and
- If necessary continuing through the steps of the Intervention Strategy until the issue is rectified or a report to PRISM has been made.

Students must provide a doctor's certificate for any absences of more than 2 days. The doctor must be a registered medical practitioner. If they are absent for 1 or 2 days, their carer must provide a letter of explanation.

### **Strategy for Academic Issue**

In line with the Intervention Strategy the International Student Coordinator is charged with the responsibility of:

- Identifying the cause of the poor academic performance through conversation with the student and parent/guardian of a minor child, and review of academic records;
- Negotiating and documenting an appropriate intervention/assistance plan with specified timeframes and outcomes;
- Monitoring the success of the outcomes; and

- If necessary, continuing through the steps of the Intervention Strategy until the issue is rectified or a report to PRISM has been made.

### **Strategy for Non-Academic/ Attendance Issue**

The Head of House/Director of Boarding/International Student Coordinator is tasked with the responsibility of:

- Identifying the issue through conversation with the student and parent/guardian if a minor child, providing appropriate options for support;
- Where the issue has potential to affect the academic success of the student, negotiate and document a support plan with the student and parent/guardian of a minor child;
- Monitor the student's progress in regards to the support plan and academic achievement;
- Where the support plan is proving to be unsuccessful re-evaluate the support plan with the student and parent/guardian of a minor child.

### **Referral Costs**

External specialist costs are not paid for by Scotch College Adelaide and will have to be borne by the FFPOS family.

### **Review**

Scotch College Adelaide will ensure continued compliance with the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) annually.

# Overseas student referral form for intervention

Date:

Student name:

Year Level:

Referred by:

Reason for referral:

Interview / Discussion notes:

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Agreed Actions:	Person responsible:	Timeline:
1.		
2.		
3.		
4.		
5.		

Agreed by:

Date for review / next meeting:

Follow up:

- Copy of meeting notes and actions to
- Appointment made with:

[ Insert as appropriate – Parent, Form Teacher, Student Counsellor, ESL / Learning Support Teacher, Homestay host, etc.]

Follow up completed - Date:

Signed:

Scotch College Adelaide

## Sample Letter – Intention to report for unsatisfactory course progress

Scotch College Adelaide  
CRICOS Provider No. 00615B

*Insert Date:*

*Insert Student name:*

*Year Level:*

*Study Period:*

*Current Address in Australia:*

*Phone number:*

*Email:*

*cc. Insert parent's names*

*Insert Parent's address*

Dear student,

This letter is to inform you that Scotch College Adelaide intends to report you to the Department of Home Affairs for unsatisfactory course progress as required by the Education Services for Overseas Students Act 2000.

Under the Migration Act 1958, student visa condition 8202 requires student visa holders to:

- maintain enrolment in a 'registered course';
- maintain satisfactory attendance in your course and course progress for each study period as required by your education provider.

According to our records, you have not achieved satisfactory course progress as defined in the National Code of the ESOS Act (and the school's course progress policies and procedures attached/available in Scotch College Adelaide International Student Policy and Scotch College Adelaide International Student Handbook if applicable). This is despite having been provided with the following support: (*List intervention measures to date*)

You have 20 days in which to appeal the school's decision in accordance with sections 4 and 5 of the School's Complaints and Appeals Policy. Please see attached.

You are reminded that you need to continue to abide by the conditions of your student visa, including maintaining enrolment in a registered course, for your visa to remain valid.

Depending on the outcome of the appeals process, you may be reported to the Department of Home Affairs and notified of termination of your enrolment at Scotch College Adelaide.



Scotch College Adelaide  
Carruth Road TORRENS PARK SA 5062

### Sample Letter – Intention to report for unsatisfactory course progress

Scotch College Adelaide  
CRICOS Provider No. 00615B

*Insert Date:*

*Insert Student name:*

*Year Level:*

*Study Period:*

*Current Address in Australia:*

*Phone number:*

*Email:*

*cc. Insert parent's names*

*Insert Parent's address*

Dear student,

This letter is to inform you that Scotch College Adelaide intends to report you to the Department of Home Affairs for unsatisfactory attendance as required by the Education Services for Overseas Students Act 2000.

Under the Migration Act 1958, student visa condition 8202 requires student visa holders to:

- maintain enrolment in a 'registered course';
- maintain satisfactory attendance in your course and course progress for each study period as required by your education provider.

According to our records, you have not achieved satisfactory course attendance as defined in the National Code of the ESOS Act (and the school's course progress policies and procedures attached/available in Scotch College Adelaide International Student Policy and Scotch College Adelaide International Student Handbook if applicable). This is despite having been provided with the following support: (*List intervention measures to date*)

You have 20 days in which to appeal the school's decision in accordance with sections 4 and 5 of the School's Complaints and Appeals Policy. Please see attached.

You are reminded that you need to continue to abide by the conditions of your student visa, including maintaining enrolment in a registered course, for your visa to remain valid.

Depending on the outcome of the appeals process, you may be reported to the Department of Affairs and notified of termination of your enrolment at Scotch College Adelaide.

Scotch College Adelaide  
Carruth Road TORRENS PARK SA 5062

#### **Sample Letter – Notification that Enrolment will not be cancelled**

Scotch College Adelaide  
CRICOS Provider No. 00615B

*Insert Date:*

*Insert Student name:*

*Year Level:*

*Current Address in Australia:*

*Phone number:*

*Email:*

*cc. Insert parent's names*

*Insert Parent's address*

Dear student,

This letter is to inform you that your appeal against reporting you to Department of Home Affairs for failing to meet satisfactory *[insert as applicable course progress / attendance]* has been successful.

Your enrolment will not be cancelled because of the following reasons:

*(Insert reasons / OSO findings, etc)*

You are reminded that you need to continue to abide by the conditions of your student visa, including maintaining enrolment in a registered course, and maintaining satisfactory attendance and course progress for your visa to remain valid.

Scotch College Adelaide  
Carruth Road TORRENS PARK SA 5062

# **Sample Letter – Notification that Enrolment will be cancelled**

Scotch College Adelaide  
CRICOS Provider No. 00615B

*Insert Date:*

*Insert Student name:*

*Year Level:*

*Current Address in Australia:*

*Phone number:*

*Email:*

*cc. Insert parent's names*

*Insert Parent's address*

Dear student,

This letter is to inform you that your appeal against reporting you to Department of Affairs for failing to meet satisfactory *[insert as applicable course progress / attendance]* has not been successful.

Your enrolment will be cancelled as of --- / --- / ---- because of the following reasons:

*(Insert reason(s) as applicable)*

- You have chosen not to access Scotch College Adelaide's complaints and appeals process within 20 working days
- The outcome of Scotch College Adelaide's complaints and appeals process has found in favour of the Scotch College Adelaide.
- You have advised you are withdrawing from Scotch College Adelaide's complaints and appeals process.

Scotch College Adelaide will now notify Department of Home Affairs that your enrolment has been cancelled for failure to meet *(insert as applicable course progress / attendance)* requirements.

*(Insert any further instructions/advice to student prior to leaving the school, e.g., returning textbooks, etc.)*

You are reminded that you need to continue to abide by the conditions of your student visa, including maintaining enrolment in a registered course. If you wish to seek re-enrolment with another education provider, you should do this within 28 days of your termination of enrolment at Scotch College Adelaide to avoid possible visa cancellation.

*(If applicable: Even though you are no longer be enrolled with Scotch College Adelaide as of --/--/-- , you will need to maintain approved arrangements for welfare and accommodation until another education provider enrolls you and takes over responsibility for approving arrangements, or until you depart Australia.)*

Scotch College Adelaide  
Carruth Road TORRENS PARK SA 5062

## The ESOS Framework – providing quality education and protecting your rights

The Australian Government wants overseas students in Australia to have a safe, enjoyable and rewarding place to study. Australia's laws promote quality education and consumer protection for overseas students. These laws are known as the ESOS framework and include the *Education Services for Overseas (ESOS) Act 2000* and the National Code.

### Protection for overseas students

As an overseas student on a student visa, you must study with an education provider and in a course that can be found on the [Commonwealth Register of Institutions and Courses for Overseas Students \(CRICOS\)](#). CRICOS registration guarantees that the course and the education provider at which you study meet the high standards necessary for overseas students. Please check carefully that the details of your course – including its location – match the information on CRICOS.

### Your rights

The ESOS framework protects your rights, including:

- your right to receive, before enrolling, current and accurate information about the courses, fees modes of study and other information from your provider and your provider's agent. If you are under 18, to ensure your safety, you will be granted a visa only if there are arrangements in place for your accommodation, support and welfare;
- your right to sign a written agreement with your provider before or as you pay fees, setting out the services to be provided, fees payable and information about refunds of course money. You should keep a copy of your written agreement;
- your right to get the education you paid for. The ESOS framework includes consumer protection that will allow you to receive a refund or to be placed in another course if your provider is unable to teach your course;
- your right to know:
  - how to use your provider's student support services;
  - who the contact officer or officers are for overseas students;
  - if you can apply for course credit; when your enrolment can be deferred, suspended or cancelled;
  - what your provider's requirements are for satisfactory progress in the courses you study;
  - if attendance will be monitored for those courses;
  - what will happen if you want to change providers; and how to use your provider's complaints and appeals process.

## Staff Orientation / Induction to ESOS Framework

### References:

#### National Code of Practice for Providers of Education and Training to Overseas Students 2018

It is a requirement under the National Code of Practice for Providers of Education and Training to Overseas Students 2018 that Scotch College Adelaide ensures that staff members who interact directly with full fee paying overseas students are aware of the School's obligations under the ESOS framework and the potential implications for students arising from the exercise of the obligations.

Relevant information about the School's obligations under the ESOS framework is provided to appropriate staff in the following ways;

- Teaching and administration staff are briefed in the beginning of year professional learning program by the International Student Coordinator
- New staff will be briefed as part of their induction to the College by the International Student Coordinator about the school's obligation under the ESOS framework
- The provision of information to boarding staff will be facilitated the Head of Boarding
- The Enrolments department will be responsible for ensuring that enrolment & marketing material for overseas students reflects the current obligations under the ESOS framework
- Resources will be made available to staff to access independently in the form of professional reading or meeting minutes by the International Student Coordinator.

## Staff Capabilities, Educational Resources and Premises Policy

Scotch College Adelaide is an accredited non-government school in South Australia and as such is subject to an appropriate quality assurance framework applying to registered courses, as is required under the National Code of Practice for Providers of Education and Training to Overseas Students 2018

*The Director of Human Resources* in conjunction with the Director of Teaching and Learning is responsible for staff recruitment, including recruitment, induction, performance assessment and ongoing development of staff involved with recruitment or delivery of education or client services to overseas students. They are aware of obligations under the National Code of Practice for Providers of Education and Training to Overseas Students 2018

*Chief Operating Officer* is responsible for management of facilities, including facilities used by overseas students, and is aware of obligations under the National Code of Practice for Providers of Education and Training to Overseas Students 2018

*Director of Teaching and Learning* is responsible for management of resources, including resources used by overseas students, and is aware of obligations under the National Code of Practice for Providers of Education and Training to Overseas Students 2018

It is a requirement under the National Code of Practice for Providers of Education and Training to Overseas Students 2018 that the School have sufficient student support personnel to meet the needs of overseas students enrolled at

the School. Scotch College Adelaide ensures staffing, facilities and resources meet the needs of overseas students enrolled at the School in the following ways:

- One fully trained ESL staff member who is responsible for English as an Additional Language or Dialect
- One International Student Coordinator;
- Designated Boarding staff to oversee the wellbeing of International Students
- Staff student ratio for Torrens Park Campus is 1:11;
- ESL teacher provides support to workshops for staff on how to cater for student learning;
- Professional development activities are made available to staff;
- Student classroom with technological support.

*Chief Operating Officer* is responsible for reviewing and updating the School policy and procedures to ensure appropriate staffing, premises and resources for support of and course delivery full fee paying 500 visa subclass students. This policy should be checked and updated whenever there is a change in regulations about the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) or when existing policies need to be adapted or strengthened. Scotch College Adelaide will provide written notification to the designated authority and the student enrolled with the College of any intention to relocate premises at least 3 months before the relocation.