

SGA Accommodation and Caregiver Policy and Procedures

1. Purpose

Study Group Australia Pty Limited (SGA) is committed to providing safe and supportive living and learning environments that ensure the safety and wellbeing of all students.

The policy and its procedures provide for appropriate accommodation, support and welfare arrangements to be in place for students under the age of 18 who intend to travel to and study in Australia.

2. Scope

The policy and its procedures apply to students aged under the age of 18:

- for the duration of their Confirmation of Appropriate Accommodation and Welfare (CAAW) arrangements and who intend to study in Australia without the care of a Department of Home Affairs (DHA) approved parent(s), legal guardian or Nominated Relative; or
- who intend to study in Australia in the care of a DHA-approved parent(s), legal guardian or Nominated Relative and do not require a CAAW.

3. Policy principles

An applicant must have reached the age of 16 years prior to the commencement of their SGA course to be eligible for admission.

SGA requires all students aged under 18, including students intending to travel to and study in Australia for student visa purposes and those students without a student visa, to have one of the following welfare arrangements in place or meet one of these conditions:

- supervision by a DHA-approved parent(s), legal guardian or Nominated Relative who holds a 590 guardian visa or other appropriate visa as determined by the DHA;
- an approved CAAW that includes appropriate caregiver arrangements.

Students and their parents or legal guardian must refer to DHA's website <https://www.homeaffairs.gov.au/> for instructions on nominating a relative to provide welfare for their child in Australia and for more information on appropriate visas.

When SGA enrolls a student visa holder who is under the age of 18 it will:

- comply with its obligations under the National Code applicable to students aged under 18 by approving caregiver arrangements that are appropriate for a student's age, maturity, English language proficiency and other needs;
- comply with all applicable child protection laws and child safety requirements;
- ensure that current and valid working with children (or equivalent) checks are carried out for staff involved in providing accommodation or caregiver services to students aged under 18;
- ensure that the accommodation providers and caregivers it engages provide SGA with evidence that they comply with SGA's minimum standards (refer to Appendix A);
- take immediate action to deal appropriately with reports of non-compliance with SGA's minimum standards (refer to Appendix A) by accommodation providers and caregivers.

4 Procedures

4.1 Accommodation, support and welfare arrangements for students under 18

SGA and its Colleges will only enrol students under the age of 18 if their accommodation, support and welfare arrangements meet the requirements of the DHA, SGA's minimum standards and requirements, and the relevant policies and procedures of its University partners.

4.1.1 Confirmation of Appropriate Accommodation and Welfare requirements

A CAAW is required if a student under 18 intends to travel to and study in Australia for student visa purposes and not be in the care of a DHA-approved parent, legal guardian or Nominated Relative.

A CAAW is not required if:

- a student does not require a student visa;
- a student under 18 will be living in Australia with their DHA-approved parent(s), legal guardian or Nominated Relative.

By approving a CAAW, Colleges and University partners do not have legal responsibility for a student. The student's parents or legal guardian remain at all times legally responsible for the student.

Where a University partner or a College takes responsibility for issuing a CAAW, Colleges will:

- inform the DHA of the nominated dates for which responsibility has been accepted for approving the student's accommodation, support and general welfare arrangements;
- ensure any adults involved in or providing accommodation, homestay and caregiver services to the student have relevant State/Territory working with children (or equivalent) clearances;
- provide students with emergency contact details and current information on how to report critical incidents and manage emergency situations, to ensure student safety and welfare;
- maintain up-to-date records of students' contact details, including the contact details of a student's parent(s), legal guardian, approved suitable relative or adult responsible for the student's welfare;
- inform the DHA within 24 hours if a College or University partner is no longer able to approve the student's welfare arrangements; and
- inform University partners, as soon as practicable, if the student will be cared for by a DHA-approved parent, legal guardian or Nominated Relative and a CAAW is no longer required. Colleges will make arrangements to cancel the CAAW as required by the National Code.

4.1.2 Duration of CAAW

Approved accommodation and caregiver arrangements will normally finish when the student turns 18, 7 days after the electronic Confirmation of Enrolment (eCoE) finishes, or when a University partner or College takes responsibility for approving the student's accommodation and caregiver arrangements, whichever occurs first.

SGA will approve the CAAW and issue a CAAW letter from the date of receipt of:

- confirmation that the student has booked with an SGA-approved accommodation provider or caregiver, and
- an under 18 agreement that is signed by the student and their parent(s) or legal guardian, and
- signed accommodation and caregiver agreements that have:
 - the dates of stay and the provider details;
 - the name, address and contact information of the caregiver(s);
 - welfare start and end dates; and
 - signatures of the student, their parent(s) or legal guardian and the provider representative.

The CAAW letter must have a start date of between 7 to 14 days before the date of the student's course commencement, and depending on the student's circumstances, run for:

- the same period of time as the eCoE; plus
- 7 days after the end date of the student's enrolment (or until the date they turn 18);
- no less than 7 days prior and no more than 14 days prior to the student's subsequent course commencement.

4.1.3 Changes to accommodation and/or caregiver arrangements

College approval is needed if a student under 18, and their parent(s) or legal guardian, wishes to change their approved accommodation and/or caregiver arrangements. Colleges will notify the DHA of any changes to the CAAW, to confirm the approval of changed arrangements.

4.1.4 Student conduct during enrolment and approved welfare arrangements

As part of acceptance of the Terms and Conditions of their enrolment, students must comply with the SGA Standards of Conduct and the provisions of the under 18 agreement at all times, including while residing with approved accommodation providers.

In situations where a student under 18 breaches the Terms of Conditions of their enrolment, the SGA Standards of Conduct or their approved welfare arrangements, the College Director or delegate has discretion to take appropriate action under the Progression, Exclusion and Graduation Policy and Procedures. This includes, but is not limited to, suspending or cancelling a student's enrolment for non-academic misconduct.

4.1.5 Suspension or cancellation of enrolment

If a College suspends or cancels the enrolment of a student under 18, the College or its University partners will continue to approve the CAAW of the student until evidence is provided:

- confirming that alternative welfare arrangements are approved by another registered provider;
- that care of the student by a parent, legal guardian, or Nominated Relative is approved by the DHA;
- that the student has left or will leave Australia,
- that the College has notified the DHA that the College or a University partner is no longer able to approve the student's welfare arrangements, or
- that the College has taken the required action after not being able to contact the student.

4.1.6 Minimum standards for accommodation, homestay and caregiver arrangements

A student under 18, and/or their parent(s) or legal guardian, or the student's education agent, must contact directly and book with accommodation providers or caregivers that SGA has approved and registered, to ensure welfare arrangements are compliant with SGA's minimum standards.

SGA maintains registers of approved accommodation providers and caregivers it requires students to use. This information is made available to parents and legal guardians of intending students aged under 18 seeking to apply for a student visa to study in Australia.

Welfare arrangements offered by providers must meet the minimum standards outlined in Appendix A.

As part of maintaining their registration with SGA, all providers are required to confirm with SGA that they have appropriate arrangements to cater for students of various ages and needs and provide evidence on an agreed basis that they comply with SGA's minimum standards.

All student accommodation and caregiver arrangements are assessed by SGA, its Colleges, or one of its registered service providers, for suitability prior to and during the time of a student's approved welfare arrangements.

4.1.7 Safeguarding the welfare of students

Where there are student safety or welfare concerns during a student's enrolment at a College, the College Director or delegate will:

- implement the provisions of the Safeguarding Policy and Procedures; and
- in the event of a critical incident that disrupts or has the potential to disrupt the welfare arrangements of one or more students who are under 18 years of age, implement the Critical Incidents Policy and Procedures.

During non-compulsory study periods, students under 18 must remain in their approved accommodation and caregiver arrangements, or in the care of their DHA-approved parent(s), legal guardian or Nominated Relative.

4.2 Terminating a CAAW

4.2.1 Transfer of a student to another education provider

If a College enrolls a student under the age of 18 who intends to transfer to a different education provider, the College and/or University partner agrees to release the student and the College has written confirmation that the student's parent(s) or legal guardian supports the transfer, the College

Director or delegate will inform the student and their parent(s) or legal guardian that the new provider must:

- negotiate the transfer date of accommodation, support and welfare arrangements from the College to the new provider to ensure there is no gap; and
- inform the student of their visa obligation to:
 - maintain their current CAAW arrangements until the agreed transfer date, or
 - have alternate accommodation, support and welfare arrangements approved, or
 - return to their home country until the start date of new approved arrangements; and
- where the student is not being cared for in Australia by a DHA-approved parent(s), legal guardian or Nominated Relative, confirm that it accepts responsibility for the approving the student's accommodation, support and general welfare arrangements in accordance with Standard 5 of the National Code.

4.2.2 Terminating a CAAW due to other reasons

Where a College or University partner is no longer able to approve the welfare arrangements of a student for other reasons, the College Director or delegate must make all reasonable efforts to ensure that the student's parents or legal guardians are notified immediately. If SGA does not approve a student's accommodation or caregiver arrangements, it must terminate the CAAW and report this to the DHA. The decision to report is made by the College Director or delegate in consultation with the relevant SGA Executive.

A decision to terminate a CAAW and report to the DHA may be due to, but is not limited to:

- a student breach of the Terms and Conditions and contract of their enrolment;
- a student refusing, leaving without notice or not maintaining their approved welfare arrangements;
- a student breach of accommodation or caregiver arrangement rules;
- a student breach of the SGA Standards of Conduct;
- a student's enrolment being suspended or cancelled;
- a student going missing from their accommodation and cannot be found or contacted, even after SGA has implemented the SGA Critical Incident Policy and Procedures;
- an accommodation provider being unable to maintain welfare arrangements.

If a student will not maintain approved accommodation and caregiver arrangements after reasonable attempts have been made by a College to assist the student, SGA will report to the DHA that it can no longer approve the arrangements for the student.

A report to the DHA may result in cancellation of a student's visa or other action, as determined by the DHA.

5. Records Management

Records in association with this policy will be kept in accordance with the Records Management Policy and Procedures. Confidential documents related to the implementation of the policy will be maintained according to relevant privacy requirements.

6. Definitions

The following definitions are used in this policy:

Accommodation providers	SGA's registered and approved list of accommodation providers that must meet SGA's minimum standards (refer to Appendix A). These include large scale residential student accommodation providers and Homestay providers.
Affiliates	Consultants and contractors to the College, members of the SGA Board and Committees, members of College committees; and any other persons appointed or engaged by SGA to perform duties or functions on its behalf.

CAAW	The Confirmation of Appropriate Accommodation and Welfare letter issued by a College or a University partner to approve a student visa holder's welfare and accommodation arrangements while under 18 years of age and while enrolled.
Caregiver	A person or organisation engaged by a student's parents or legal guardians to provide support and welfare services to the student in Australia, while on a student visa.
College	Each of ANU College and Taylors College Sydney, including College staff and affiliates.
College Director	The most senior staff member for the College (or their delegate).
Course	A sequence of academic subjects delivered by SGA to achieve stated learning outcomes.
Critical incident	<p>A traumatic event, or the threat of a traumatic event, either on or off campus or on-line, that causes extreme stress, fear or injury to one or more students, such as significant disruption to the study routine (which might prevent a student from completing or continuing with the course), an emergency management situation, or threat to the safety of students and staff.</p> <p>Critical incidents include, but are not limited to:</p> <ul style="list-style-type: none"> • students who have gone missing, whose whereabouts are unknown and who are unable to be contacted • severe verbal or physical aggression • critical mental health episodes • drug or alcohol abuse • domestic violence • physical, sexual or other abuse or assault • death, serious injury or any threat of these • serious accidents • fire or natural disaster.
Delegate	A person authorised to perform a specific responsibility.
Department of Home Affairs (DHA)	The Australian Government department responsible for issuance of student visas and provision of student visa services (www.homeaffairs.gov.au).
eCoE	An electronic Confirmation of Enrolment is issued by SGA or one of its University partners to verify a student's enrolment in a course.
Education agent	A person or organisation (within or outside Australia) who recruits overseas students and refers them to education providers.
Enrolment	Confirmed acceptance into a course where a student is progressing towards the completion of the course requirements.
Homestay	Students who choose the Homestay accommodation option will be placed in the home of a local family.
National Code	The National Code of Practice for Providers of Education and Training to Overseas Students 2018 made under subsection 33(1) of the Education Services for Overseas Students (ESOS) Act 2000 (Cth) . It outlines nationally consistent standards for the

conduct of registered providers and the registration of their programs.

Nominated Relative	A suitable relative aged 21 or over who is nominated by a student's parents or legal guardian, and is approved by the DHA to be responsible for a student's welfare while studying in Australia. They can be a grandparent, spouse, de facto partner, brother, sister, aunt, uncle, niece, nephew, step-parent, step-grandparent, step-brother, step-sister, step-aunt, step-uncle, step-niece, or step-nephew.
SGA	Study Group Australia Pty Limited.
State/Territory	For the purposes of this policy, the Australian State or Territory in which a College operates.
Terms and Conditions of enrolment	The Student Contract of Enrolment, including the Letter of Offer, Acceptance of Offer, terms and conditions, the SGA Cancellation and Refund Policy and Procedures, and associated policies and procedures.

7. Related Documents

The following legislation and documents are related to this Policy:

Children and Young People Act 2008 (ACT)

Children and Young Persons (Care and Protection) Act 1998 (NSW)

Education Services for Overseas Students Act (ESOS) Act 2000 (Cth)

Education Services for Overseas Students Regulations 2019 (Cth)

Education Services for Overseas Students (Foundation Program Standards) Instrument 2021

ELICOS Standards 2018

Privacy Act 1988 (Cth)

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

Cancellation and Refund Policy and Procedures

Critical Incidents Policy and Procedures

Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy and Procedures

Progression, Exclusion and Graduation Policy and Procedures

Records Management Policy and Procedures

Safeguarding Policy and Procedures

[Standards of Conduct Policy](#)

Student Enrolment Terms and Conditions

Student Privacy Policy

SGANZ Working with Children Check and Children's Worker Safety Check Policy

[Study Group Global Code of Conduct](#)

8. Policy governance

Document name	SGA Accommodation and Caregiver Policy and Procedures		
Version number	3.0		
Policy Owner	Head of ISCs		
Endorsed	Executive Team	Date endorsed	8 December 2021
Approved	Managing Director, SGANZ	Date approved	8 December 2021
Review date	3 years after approval date		

9. Document History

Commencing Date	Version / Summary of Changes	Next Review Date
30 May 2016	v1.0 Initial approval by Executive Directors	May 2021
15 September 2018	v2.0 Retitled and minor amendments to maintain regulatory and business currency. Former title 'SGA Students Under the Age of 18 Overall Policy and Procedure'	September 2023
2 April 2019	v2.1 Minor administrative amendment to maintain currency	September 2023
7 June 2019	v2.2 Minor administrative amendment to maintain currency. Extension of scope to include University of Sydney Foundation Program (CRICOS Course Code: 022310D) delivered by SGA's Taylors College (Sydney campus) on behalf of the University of Sydney (CRICOS Provider code 00026A). (Authorised by COO-ANZ. Effective from 7 June 2019)	September 2023
8 September 2020	v2.3 Minor amendment to maintain regulatory and business currency.	September 2023
8 December 2021	v3.0 Major review. Policy renamed from previous Safety and Wellbeing of Under-18 Students Policy and Procedure to cover caregiver requirements, minimum standards for providers and to better align with College processes. Safety and wellbeing of under 18 students and child protection covered primarily under new Safeguarding Policy and Procedures, to better align with global policy.	8 December 2024

Appendix A: SGA Minimum Standards for Accommodation Providers and Caregivers

Residential Accommodation Provider Obligations

1. Residential Accommodation Providers must:
 - (a) advertise and promptly inform students, and their parents, legal guardian or caregiver, of all fees for the following year, including placement and boarding fees, by 30 September of the previous year;
 - (b) advertise and comply with their cancellation and refund policies;
 - (c) confirm a student's placement in writing to the student and SGA no later than 2 weeks before the start of the student's course;
 - (d) provide to each student and SGA, a current and accurate residential staff directory, including an emergency point of contact;
 - (e) provide a single point of contact for students under 18 that is available 24 hours a day, 7 days a week;
 - (f) ensure that students are picked up and dropped off on arrival and departure days;
 - (g) provide to each student age and culturally appropriate information on seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse;
 - (h) notify SGA and the student's caregiver of any issues in a timely manner;
 - (i) ensure that SGA and the student's caregiver have access to the student's accommodation within 48 hours after the student's arrival, and at least once every 6 months thereafter, to verify that the accommodation is appropriate for the student's age and needs;
 - (j) maintain appropriate and compulsory (guaranteed) insurance cover for the residential provider and students, as determined by SGA from time to time, and in line with industry expectations.
2. Residential Accommodation Providers must make publicly available on the internet, policies and procedures:
 - (a) explaining the fee structure and cancellation and refund policy for all payments made;
 - (b) their expectations of students, including accommodation rules and room standards;
 - (c) a current list of support staff and their responsibilities towards students under 18;
 - (d) complaint handling processes, including provision to arrange for an alternative room, where the student's existing room is unsuitable due to a dispute or otherwise; and avenues for complaint escalation;
 - (e) a copy of the proposed binding agreement to be signed by the Residential Provider, the student and their parents or legal guardian, or caregiver.
3. Residential Accommodation Providers must provide evidence of:
 - (a) a documented and comprehensive approach to student orientation;
 - (b) ongoing training for support staff of students under 18, including supporting data and training materials ;

- (c) regular communication and liaison with students' parents, legal guardians or caregiver;
 - (d) a 24 hours, 7 days a week critical incident and phone support strategy, including procedures for follow-up action required during a critical incident;
 - (e) an ongoing strategy for the management and accountability of all payments made on behalf of the student;
 - (f) compliance with working with children (or equivalent) checks as per State/Territory requirements.
4. Within two working days of any request by SGA, Residential Providers must provide:
- (a) copies of each binding agreement between the relevant student, parents or legal guardians and the residential provider, including the start and end dates for the residential arrangement. Such agreements must be dated, signed by all parties and include the residential provider contact details. The residential commencement date must be between 7 to 14 days prior to the student's arrival. The end date must not be before the student turns 18;
 - (b) a complete list of all past, current and pending students under the care of the residential provider;
 - (c) information regarding, but not limited to:
 - (i) student complaints;
 - (ii) critical incidents;
 - (iii) working with children (or equivalent) checks;
 - (iv) compliance.

Homestay Provider Obligations

1. The Homestay Provider must:
- (a) provide the highest possible standard of services to students in a consistent, efficient and reasonable manner, that meet SGA's requirements and that are appropriate for a student's age and needs;
 - (b) keep all the personal information it handles secure and confidential, including the information of students, Homestay Hosts and their household members or relatives, and as required by relevant privacy laws and SGA requirements;
 - (c) enter into a written agreement with each Homestay Host on the terms consistent with SGA's requested services;
 - (d) enter into a written agreement that is agreed and signed with each student and their parents or legal guardian before the homestay accommodation is provided, which includes a start date between 7 to 14 days before the start of the student's course with SGA;
 - (e) carry out agreed services and obligations with all due care and skill and by appropriately qualified, competent, trained and registered (as applicable) personnel

- (f) ensure that Homestay Provider personnel are appropriately trained and qualified for working with students under 18, provide ongoing training to personnel who are responsible for students under 18 and maintain documented evidence of the training;
- (g) ensure that none of the Homestay Provider personnel have been convicted of an offence that would result in disqualification under relevant State/Territory laws and requirements for working with children;
- (h) maintain current and applicable insurances, licenses, registers of State/Territory working with children (or equivalent) checks, and qualifications, and provide SGA with certified copies of these before a written agreement with SGA is signed;
- (i) notify SGA immediately if it becomes aware of any criminal convictions, charges, allegations and investigations in respect of a Homestay Host or Homestay Provider personnel member;
- (j) provide to SGA within 24 hours of an SGA request, a current list of host families and their details, including relevant State/Territory working with children (or equivalent) checks and clearances;
- (k) make available to SGA, no later than September each year (or a mutually agreed date), an annual schedule of fees and charges effective 1 January the following year, which includes boarding and placement fees and confirmation that fees and charges will not increase within a calendar year.

2. The Homestay Provider must:

- (a) as soon as possible and no later than 7 days after receipt of an SGA request, recommend and make available suitable, and where applicable culturally-specific, Homestay Accommodation, including a completed inspection report;
- (b) ensure students are given age and culturally-appropriate information approved by SGA on:
 - (i) who to contact in emergency situations, including contact numbers of a nominated staff member of the Homestay Provider and of SGA; and
 - (ii) who to seek assistance from and who to report any incident or allegation involving actual or alleged sexual, physical or other abuse;
- (c) nominate the dates for which the Homestay Provider and Homestay Host have contractually agreed to be responsible for assisting SGA in approving a student's welfare arrangements and advise SGA of the dates required by SGA;
- (d) ensure that Homestay Provider personnel, including the Homestay Host and relevant household members, have current and cleared working with children (or equivalent) checks as required by the relevant State/Territory jurisdiction, and maintain registers of these checks and clearances;
- (e) visit each Homestay Accommodation:
 - (i) to conduct a pre-selection inspection;
 - (ii) regularly and no less than once every six months and provide SGA with inspection reports and reports on any matter requested by SGA;
 - (iii) upon request by SGA
 - (iv) within 24 hours in the event of an emergency;

- (f) ensure that Homestay Provider personnel and Homestay Hosts have access to SGA's policies relevant to students aged under 18;
- (g) conduct briefing sessions that are approved and requested by SGA, with each potential and current Homestay Host on matters including, but not limited to:
 - (i) understanding the needs of students, including students under 18, most of whom are away from their home environment for the first time;
 - (ii) understanding cultural, linguistic and religious differences;
 - (iii) a flexible approach to house rules, discipline and shared responsibilities;
 - (iv) what to do if an issue arises;
 - (v) updates or changes to legislation, policies or procedures.
- (h) maintain a record of training and a register of all Homestay Hosts and their families' attendance at the training;
- (i) have implemented and documented processes for SGA to verify that each student's Homestay Accommodation is appropriate to the student's age and needs and prior to the Homestay Accommodation being approved and at least every six months thereafter;
- (j) have access to the SGA Critical Incident Policy and Procedures, including the process for managing emergency situations and disruptions to a student's welfare arrangements;
- (k) maintain and provide to SGA upon request, up-to-date records of the student's contact details, including:
 - (i) the student's current residential address, mobile number (if any) and email address (if any);
 - (ii) who to contact in emergency situations;
 - (iii) the contact details of the student's parent(s), legal guardian or any adult responsible for the student's welfare; and
 - (iv) any changes to those details, within seven days of the change;
- (l) advise SGA within 12 hours if the Homestay Provider is no longer able to assist SGA in approving a Homestay Accommodation option;
- (m) have documented policies and processes for selecting, screening and monitoring any Homestay Hosts engaged by the Homestay Provider, including with regard to organising and assessing each Homestay Accommodation option;
- (n) immediately notify SGA when the Homestay Provider becomes aware that a Homestay Accommodation option is no longer available or no longer meets SGA's minimum standards, and, if requested by SGA, make all reasonable efforts to ensure that the student's parents or legal guardian are notified as soon as practicable;
- (o) immediately notify SGA if the Homestay Provider or Homestay Host is unable to contact a student and has concerns for the student's welfare, including assisting SGA in locating the student and if requested, assist in notifying the police and any other relevant State/Territory or Commonwealth agencies as soon as practicable;
- (p) where SGA suspends or cancels the enrolment of a student and it notifies the Homestay Provider, the Homestay Provider must continue to make available the

Homestay Accommodation placement for a student until SGA notifies the Homestay Provider that the accommodation is no longer required, or any of the following applies:

- (i) the student has alternative Homestay Accommodation approved by another registered provider;
- (ii) care of the student by a parent, legal guardian or nominated relative is approved by the DHA;
- (iii) the student leaves Australia.

3. The Homestay Provider must:

- (a) facilitate contact between each student and their assigned Homestay Host when the student arrives in Australia;
- (b) immediately inform SGA of any concerns, complaints or matters raised by a student and/or a Homestay Host;
- (c) ensure that any hazards or risks are promptly investigated and, if required, promptly rectified as appropriate;
- (d) provide to the Homestay Hosts the Homestay Guidelines and any other applicable documents (as amended from time to time by SGA);
- (e) ensure that the Homestay Hosts are aware of and comply with the Homestay Guidelines and all applicable laws at all times;
- (f) make available to the public online all policies, procedures and documents, which includes the responsibilities of the Homestay Provider and Homestay Host, the Homestay Provider's and Homestay Host's expectations, and avenues for students to lodge complaints and appeals;
- (g) have and implement a documented process to allow SGA to access information online or in writing in relation to students, including in relation to complaints, within two working days of a request;
- (h) have and implement a documented communication plan for communication and feedback between all stakeholders, including SGA, the Homestay Provider, the Homestay Hosts, students and their parents and/or guardians, and caregivers.

Caregiver Obligations

1. The Caregiver must:

- (a) verify that each student's accommodation is appropriate to the student's age and needs, including:
 - (i) after the student's arrival at the accommodation facility/homestay, and
 - (ii) at least once every six months thereafter;
- (b) meet all students in person after their arrival at the accommodation facility/homestay;
- (c) provide a single point of contact for each student and their parents or legal guardians and provide an emergency contact number which must be answered 24 hours a day, 7 days a week;
- (d) maintain regular personal contact with the students, including:

- (i) speaking to students once every week by telephone; and
 - (ii) meeting students fortnightly in person at the College where the student is studying;
- (e) provide 24 hour telephone advice and emergency assistance for students;
- (f) provide age and culturally appropriate information to students on:
 - (i) who to contact in emergency situations, including contact numbers; and
 - (ii) seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse;
- (g) if the caregiver is unable to contact a student and has concerns for the student's welfare, the caregiver must notify SGA and make all reasonable efforts to locate the student.
- (h) provide orientation support for students, as appropriate, including:
 - (i) providing information about local public transport;
 - (ii) providing information about support services that a student can access outside of SGA;
 - (iii) assisting students with opening an Australian bank account, if required;
 - (iv) assisting students with obtaining an Australian SIM card or mobile data services, if required; and
 - (v) assisting students with personal problems or issues, as they arise;
- (i) send a report to each student's parents or legal guardian within 20 days of the date of the student's arrival, including:
 - (i) an overview of the student's accommodation, including photographs (if the host permits photos to be taken);
 - (ii) the student's local bank account details and how to transfer funds directly from the parent or legal guardian to the student;
 - (iii) the local mobile phone number of the student;
 - (iv) information on the general welfare of the student, including studies, transport to and from SGA and how the student is settling in;
 - (v) the caregiver's full name and direct contact details of carer, including the full office address and contact numbers for the caregiver; and
 - (vi) a 24 hour emergency number for parents or legal guardians to call in the event of an emergency.
- (j) subject to obtaining the written agreement of the student's parents or legal guardians, attend parent/teacher interviews and other relevant information sessions and, if possible, provide translated notes from parent/teacher interviews to the student's parents or legal guardians; and
- (k) provide other support to students as required.

2. The Caregiver must:
 - (a) liaise with students and their Homestay Provider regarding any student complaint or grievance in relation to the student's accommodation;
 - (b) notify SGA of any unresolved complaint or grievance in relation to the student's accommodation;
 - (c) represent students in liaising with SGA, including assisting students to lodge any complaint or grievance with SGA;
 - (d) meet with the SGA staff member responsible for under 18 students or welfare as requested;
 - (e) sign any documents that must be signed on behalf of student's parents or legal guardians.

3. The Caregiver must:
 - (a) ensure that all of its personnel involved in providing caregiver services have current and valid working with children (or equivalent) checks appropriate to the States/Territory in which the caregiver provides the services;
 - (b) have a transparent complaints handling process;
 - (c) have procedures to deal with critical incidents and/or emergencies; and
 - (d) explain to students the fee structure and refund policy for any payments made by a student to the caregiver.