



# Younger Students Policy & Procedures

## Scope & Purpose

This policy and procedure applies to all Russo Business School courses, all students under the age of 18 years and all employees involved with the management of Younger Students .

This policy addresses 'Standard 5 – Younger Students' of the *'National Code of Practice for Providers of Education and Training to Overseas Students 2018*, which states: *"Where the registered provider enrolls a student who is under 18 years of age, it must meet the Commonwealth, state or territory legislation or other regulatory requirements relating to child welfare and protection appropriate to the jurisdiction(s) in which it operates."*

### POLICY OBJECTIVES

Russo Business School is committed to providing a harmonious and supportive environment for all students. Russo Business School aims to provide support to enhance students' experience during their studies and assist students to achieve success.

Russo Business School welcomes Students aged under 18 years who meet the Admission Requirements of its courses.

Russo Business School recognises that students who are under the age of 18 (particularly international students) have unique needs. RBS has developed a procedure for supporting and monitoring Younger Students and Protocols for Activities with Younger Students.

Russo Business School takes on the responsibility of approving the accommodation, support and general wellbeing arrangements of international students on a student visa under the age of 18 who are not residing with a parent or guardian (as nominated by the parents). Russo Business School approves appropriate accommodation for such students in StudentOne being a purpose-built student accommodation facility or the Australian Homestay Network (AHN). Russo Business School has designated staff members who are appropriately trained who are responsible for supporting and monitoring the welfare of students under 18 years of age.

## Definitions and Abbreviations

**Admission requirements** are the requirements that an applicant must satisfy in order to be eligible for selection. Admission requirements comprise general entry requirements, including English language proficiency and course entry requirements.

**Blue Card** – is Queensland's Working with Children Check.

**Course** is an appropriate suite and sequence of subjects that meets the requirements and specifications of the relevant level of the *Australian Qualifications Framework AQF 2<sup>nd</sup> ed, 2013* and which leads to the conferral of an award. For example, a Diploma of Business.

**Younger Student** –an Australian or International Student under the age of 18.

#### Procedure

1. Information for Younger International Students, including accommodation options and support mechanisms, will be included into the Russo Business Student Prospectus each year.
2. Prior to enrolling an applicant under the age of 18, the Executive Dean, Russo Business School (or their nominee) will undertake a risk assessment to determine the profile of the applicant and whether acceptance into a Russo Business School course is in the student's best interest and can be managed appropriately by Russo Business School. Russo Business School may choose to not make an offer to a student based on this assessment. Students must be at least 17 years of age upon commencement at Russo Business School.
3. International students who are admitted to Russo Business School courses and are studying on-campus in Australia and who will be under the age of 18 at the time of commencement will be required to demonstrate acceptable living and welfare arrangements in accordance with the [Education Services for Overseas Students Act 2000 \(Cth\)](#) before commencing their course of study. International students will be required to have secured accommodation in either Student One or with an approved Homestay family registered with Australian Homestay Network (AHN), which are registered to provide accommodation to Younger students and staff have Blue Cards as required by law.
4. Upon the younger international student's enrolment into a Russo Business School course, the Executive Dean Russo Business School (or the nominated designated officer) will implement systematic arrangements to assess and monitor the student's welfare and wellbeing and provide regular counselling and/or assistance throughout the student's enrolment. All notes of meetings are to be documented and saved in accordance with internal processes. RBS staff who have ongoing and individual contact with Younger Students will be encouraged to apply for a Blue Card.
5. If the International student is not residing in Australia with a parent or guardian, the dates for which Russo Business School will accept responsibility for the student will be nominated in the Under 18 Student Confirmation of Appropriate Accommodation and Welfare (CAAW) letter, generated in the Provider Registration and International Students Management System (PRISMS). Russo Business School's accommodation partners, Student One and Australian Homestay Network (AHN), will be contacted to confirm that the student is to be placed in appropriate accommodation in accordance with this procedure.
6. If the International student is to be living in Australia with a parent or guardian, or nominated relative, this will be approved by the Department of Home Affairs and a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter will not be generated in PRISMS.
7. All documentation is to be signed by a parent or guardian of the Younger Student.
8. The designated staff member will be nominated as per the Russo Business Schools Delegation Register.
9. Staff must ensure where possible, that younger students are counselled in a location with other staff and if a situation is deemed to be 'at risk', must have another staff member or the student's preferred representative present.
10. Should a student report concerning behaviour which has occurred at Russo Business School or elsewhere,

Russo Business School the report will be investigated and managed in accordance with relevant policies and procedures.

Domestic students who are under the age of 18 are not subject to same scrutiny of living and welfare arrangements as International Students who are studying in Australia without a guardian.

## Protocols for Activities with Younger Students

The protocols set out below complement the Student Code of Conduct Policy and provide further guidance to Russo Business School members on how to behave when they are engaged in activities related to younger students.

In circumstances where Russo Business School activities with students are conducted at another organisation’s site, or on behalf of another organisation, the codes and policies of that organisation may also apply while those activities are being conducted. The application of the other organisation’s codes and policies will operate in conjunction with Russo Business Schools Student Code of Conduct Policy and this Policy.

Protocol	Examples
Conduct interactions in the presence of other adults	<ul style="list-style-type: none"> <li>To help a student feel safe, avoid being alone with Younger Students. Ensure that another adult is present, or close by <u>and</u> able to observe interactions when providing one-on-one services to Younger Students.</li> </ul>
	<ul style="list-style-type: none"> <li>Wherever possible, conduct interactions in professional spaces and not in a home environment.</li> </ul>
	Do not transport unaccompanied Younger Students unless parental consent is provided.
Avoid unnecessary physical contact	Do not initiate, encourage or accommodate unnecessary physical contact.
	Deal sensitively with inappropriate physical contact and report it to a supervisor.
	Ensure that any physical contact with a younger student is appropriate <u>and</u> can be explained in terms of the appropriate activity and needs Younger Students
Behave professionally at all times	<ul style="list-style-type: none"> <li>Only make contact in an official capacity and as part of duties.</li> </ul>
	<ul style="list-style-type: none"> <li>Avoid discussing personal details.</li> </ul>
	<ul style="list-style-type: none"> <li>Be a positive role model</li> </ul>
	<ul style="list-style-type: none"> <li>Do not show favouritism and treat all students and vulnerable adults equitably and respectfully.</li> </ul>
	<ul style="list-style-type: none"> <li>Any steps taken to manage disruptive or unsafe behaviour should not be humiliating or isolating.</li> </ul>
	<ul style="list-style-type: none"> <li>While in hearing range of Younger Students, avoid conversations with other adults on adult or personal subject matter (e.g. relationships, lifestyle, and alcohol consumption).</li> </ul>
	Ensure that photographing, audio recording or filming via any medium is authorised in writing by the parent or guardian (see the Procedures for guidance in relation to arrangements) and/or younger student and is used solely for the purposes for which they have been authorised.
	Ensure that there is no identifying personal information in photographs or film footage of Younger students, e.g. name tags; and avoid images of students in minimal clothing, e.g. swimwear.
	Take steps to encourage the responsible use of personal equipment e.g. mobile devices should not be used to photograph, record or film.
	Do not provide personal contact details and always use the Russo Business School email and telephone for communication.
	Do not “friend” or “connect” via social media unless for purposes related to the work and with the consent of the parent or guardian.

Use technology appropriately	Be aware of issues associated with online safety. A useful resource for this is the website of the Australian Government Office of the Children’s e-Safety Commissioner.
Listen and act	If a student raises a concern, ask open questions, listen patiently, be compassionate and reassure them; and then take appropriate action to address the concern.
	If a child reports concerning behaviour which has occurred at Russo Business School or elsewhere, take action to report the behaviour in accordance with this Policy.
Seek parental consent and assent from the child or vulnerable adult, where appropriate	Seek consent from a parent or guardian of a student where prudent to do so.
	Where appropriate, seek written assent from the student to participate in an activity e.g. a research study.
Planning of spaces	Select venues and spaces for activities and events which facilitate the personal safety and access of students.
	Ensure that principles of personal safety are a requirement in design briefs for new and refurbished spaces (e.g. visibility into rooms accessed by students).
Planning an activity	Engage in risk planning and management.

## COMPLAINTS AND APPEALS

If a student is not satisfied with a decision related to this policy and procedure, they may seek an appeal as outlined in the Student Complaints and Appeals Policy and Procedure.

### Related legislation and standards to be read in conjunction with

[Blue Card Information](#)

[Homestay for Overseas Students \(under 18\) Policy.](#)

[Commonwealth Register of Institutions and Courses for Overseas Students \(CRICOS\)](#)

[Educational Services for Overseas Students Act 2000 \(ESOS Act\)](#)

[Higher Education Standards Framework \(Threshold Standards\) 2021](#)

[Higher Education Support Act 2003 \(HESA\)](#)

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

[Privacy Act 1988](#)

[Privacy Amendment \(Enhancing Privacy Protection\) Act 2012](#)

[Commission for Children and Young People and Child Guardian Regulation 2011](#)

### Related documents

*Admissions Policy*

*Health and Wellbeing Policy and Procedure*

*Student Code of Conduct*

*Staff Code of Conduct*

*Student Support Policy and Procedures*

*Privacy Policy*

### Delegation

Delegated Authority	Delegation
<b>Governance</b>	
Board of Directors	Refer to the Terms of Reference

Learning and Teaching Committee	Refer to the Terms of Reference
<b>Executives</b>	
Chief Executive Officer	Relevant to Accountability Statement
Executive Dean	Relevant to Accountability Statement
<b>Management</b>	
Dean of Studies	Relevant to Accountability Statement
Academic Support Staff – Adviser/Lecturers	Relevant to Accountability Statement
<b>Operatives</b>	
Student Administration	Relevant to Accountability Statement
Student Services	Relevant to Accountability Statement

### Version control

Policy & Procedure Version	Policy & Procedure Sponsor	Approval Authority	Date of Approval	Date for next review
1/2015	Ms Kathleen Newcombe CEO Education Group	Academic Board	1/12/2015	1/12/2016
2/2017	Dr Elizabeth O'Brien Executive Dean, Russo Business School	Academic Board	13/6/2017	13/06/2018
3/2018	Dr Paul Greenfield Executive Dean, Russo Business School	Academic Board	25/06/2018	25/06/2019
4/2020	Ms Kathleen Newcombe CEO (Education Group)	Academic Board Minor Amendment)	3/6/2020	3/6/2021
5/2022	Chief Operating Officer	Board of Directors	14/6/2022	14/6/2025