

International Students – Student Support Services and Critical Incident Policy

[ESOS Act – National Code Standards 5, 6]

- All of Brighton Grammar School’s policies are intended to be up to date and be consistent with all relevant laws.
- Employees are expected to comply with all applicable policies.
- Various parts of the policies require managers and staff to exercise discretion, and the policies are not intended to be applied in a legalistic or prescriptive manner.
- These policies may be varied by Brighton Grammar School from time to time, at its absolute discretion.
- Brighton Grammar School is fully committed to the protection of children and young people during all School activities and environments both within and outside of School hours.
- This is a whole of school policy and there may, from time to time, be variations in different parts of the School. In such circumstances, advice will be issued by the relevant Head of School.

Introduction

The Education Services for Overseas Student (ESOS) Act sets out the legal framework governing delivery of education to overseas students studying in Australia on a Student Visa. Within the ESOS legislative framework are the standards to ensure quality with which Brighton Grammar School (BGS) must comply in order to retain registration as an educational provider for International Students – the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018).

This Policy outlines the principles and approach for the welfare and protection of international students (under 18 years of age), including their adjustment to study and life in Australia, in line with Standards 5 and 6.

- Standard 5: Younger overseas students. Requires the registered provider to meet legislative and regulatory requirements relating to child welfare and protection for students under 18 years of age.
- Standard 6: Overseas support services. Requires the registered provider to provide assistance to students in adjusting to study and life in Australia.

Purpose

Brighton Grammar School acknowledges the cultural and social challenges faced by students from overseas countries while studying in Australia. These students at times may require additional support services as they are living and studying in an unfamiliar environment. Brighton Grammar School is responsible for providing access to services to ensure the mental and physical wellbeing of each international student studying with BGS.

The purpose of this policy is to outline the process in place to support an international student studying at Brighton Grammar and the managing of critical incidents involving International students.

Orientation of an International Student

General Information

Brighton Grammar School will provide each international student, their family and, where required their homestay host, with detailed age appropriate information on remaining safe and healthy whilst studying at BGS and living in Australia.

This includes information regarding:

- Study requirements including study support programs
- Extra-curricular opportunities
- EAL support programs that can be accessed
- BGS facilities and resources available
- Student Code of Conduct and expected behaviours while studying at BGS
- Student safety while studying in Australia, including information on:
 - Social etiquette and expectations
 - Water safety
 - Public transport
 - After-dark precautions
 - Emergency services
- Visa conditions and expectations, including attendance requirements and progress expectations
- Complaints and appeals processes in accordance with Standard 10
- Child Safety and Wellbeing laws including Information on seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse
- Cultural Safety (Including but not limited to Aboriginal Culture)
- Legal services (e.g. Victorian Legal Aid)
- Emergency Health Services
- Employment rights and conditions, through the Fair Work Ombudsmen
- Available support services, including School Counsellors/Psychologists, health services and assistance phone lines e.g. Headspace, Kidshelp line
- BGS Emergency contacts (also provided via the Student Safety Card) including critical incident management and assistance
- An overview of local amenities and general information e.g. public transport, beach, and shopping

All students will be provided with a Student Safety Card at their orientation. They will also be asked to record important numbers in their mobile phone (or in their parents' phone(s) in the case of Junior School students).

Orientation of a Student in Primary Studies

Our younger students must be accompanied to school on their first day by their parent(s).

The Junior School orientation program is carried out over a period of time to ensure students are not too overwhelmed and can adjust to their new environment. The program encompasses:

- Meeting with Deputy Headmaster, Head of Junior School
- Tour of the School (unless done prior to enrolment)
- Uniform purchasing assistance (if required)
- Meeting of homeroom teacher
- Meeting of specialist staff – Art, Music, Sport Teachers

Younger students will be monitored daily for the first weeks of their schooling to ensure they are settling in and supported.

All orientation activities will be recorded on the Orientation Checklist for International Students.

Orientation of a Student in Secondary Studies

Our Secondary School students' orientation will be overseen by the Director of Students and Head of Transition/Director of Operations.

The Director of Students, Head of Transition/Director of Operations or delegate will work through the Orientation Checklist for International Students to ensure all topics are covered with the student and parent prior to commencement and within the first week of studies.

During the orientation the student and parent/host will be introduced to the International Liaison Officer who will support both the parent and student with settling in to their new environment.

The support of an interpreter for Chinese and Japanese students is available if required.

All orientation sessions will be recorded on the Orientation Checklist for International Students.

School Support Services

Brighton Grammar School will provide all international students with support in mental and physical health and wellbeing both during school hours and, if needed, after hours. This is free of charge.

The International Liaison Officer is the official point of contact should a student need support. However, students also have access to the BGS Counsellors/Psychologists, and all external health services such as 'Headspace' for mental health support when needed.

When studying at Brighton Grammar School all students are allocated a 'House'. The student's House Tutor and Head of House are responsible for the pastoral care of the student. The Head of House will liaise with parents, guardians, homestay families and the International Liaison Officer to ensure international students are provided with any assistance needed.

Updating Details

BGS will review the student and family information 6 monthly to confirm that all details of the student and family are current and correct. Information reviewed will be:

- Student's current residential address
- Phone and email contact details of the Parent(s)
- Phone and email contact details of the Student (if any)
- Any accommodation and welfare arrangements, including emergency contacts

This process will be undertaken through the International Liaison Officer and communicated to the Admissions Coordinator for updating on the student's file.

Per the Conditional Letter of Offer and Written Agreement, any changes to these details must be proactively communicated to the School within 7 days of the change occurring.

Supporting Younger Students

The care and welfare of students is a priority for Brighton Grammar School and the school will ensure that all international students will have the appropriate levels of welfare and care prior to, and while attending BGS.

Brighton Grammar School will only enrol students under the age of 13 if they are residing in Australia with their parent(s). BGS will not engage in any conversation regarding homestay arrangements for students in the Junior School or under 13.

All students studying at Brighton Grammar School under a CAAW homestay arrangement will be introduced to the International Liaison Officer and be allocated a BGS staff member to be their support person. Both the International Liaison Officer and support person will ensure that the student is cared for at all times and has appropriate levels of welfare and wellbeing. If the parents wish to also engage with an external support person the school will support this decision and work with this extra support. However, responsibility for the student will always remain with the School.

The International Liaison Officer will visit all international students and their families (or homestay homes) regularly to ensure that the student is safe, supported and cared for at home. Please see the International Students - Homestay Accommodation Policy for further details on this arrangement.

If, for any reason the school cannot maintain a homestay welfare arrangement with the student, the School will immediately contact the student's family to seek alternate arrangements. The School will continue to provide welfare and care arrangements until other arrangements can be confirmed and put in place.

Supporting Parents and Families

Brighton Grammar School encourages international students to reside with their parents when studying in Australia and offers parent and family support in order to further assist in the transition in to the BGS community.

The Brighton Grammar School International Liaison Officer welcomes all international parents and families to Brighton Grammar prior to School commencement and assists all family members, mothers in particular, with integration in to the community. The International Liaison Officer will coordinate activities such as:

- Assistance in English language lessons and/or language translation assistance
- Community engagement and participation
- Wellbeing support

Course Progress and Attendance

It is expected that all students, including international students, maintain regular attendance at School both during school time and for any co-curricular after school activities in which they chose to participate. APS Sports on a Saturday morning is a compulsory activity that all Secondary School students must partake in.

Under the ESOS Act, registered providers are required to notify both students and the Australian Government when students have breached their student visa conditions as a result of having failed to maintain satisfactory course progress or attendance. Please see the International Students – Academics and Attendance Policy for further details.

Should a critical incident affect the international student's ability to attend the course or satisfactorily complete the course, the School will advise the relevant authority of such event to ensure that visa conditions are not breached.

If students have concerns with their attendance, academic performance or other related issues that are placing them at risk of not achieving the requirements of their course, they should contact their House Tutor, Head of House. International Students can also contact the International Liaison Officer for support.

All students' progress and attendance are monitored. Guidance and support are provided where unsatisfactory results are identified.

Staffing

Brighton Grammar ensures that staffing resources are sufficient and appropriate for the size and scope of its overseas student program, in alignment with CRICOS Standard 11.1. Staffing levels are regularly reviewed to confirm that the number of qualified academic, welfare, and support personnel is adequate to meet the educational and wellbeing needs of all overseas students. Recruitment, induction, and professional development is maintained to ensure staff are equipped to deliver quality education and support services, with adjustments made as enrolments increase or program requirements change.

Critical Incidents

The National Code defines a critical incident as ‘a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury’. This does not include serious academic misconduct.

Critical incidents are not limited to, but could include:

- Missing students
- Severe verbal or psychological aggression
- Death, serious injury or any threat of these
- Natural disaster
- Issues such as domestic violence, physical, sexual or other abuse
- Other non-life-threatening events

All students are provided age and culturally appropriate information regarding safety at School and outside of School while living and studying in Australia. This information and support are provided as part of the orientation process and through-out ongoing activities within the classroom as part of the wellbeing curriculum.

Supporting and Maintaining Contact with Overseas Students Undertaking Online or Distance Units (National Code Standard 6)

Where an overseas student is undertaking any online or distance unit(s) of study (whether temporarily or as the primary mode of delivery), Brighton Grammar School will implement and maintain a documented contact and support plan to monitor student engagement, welfare, and access to support services. The plan will specify agreed contact channels (e.g. school email, LMS messaging, phone), expected response timeframes, time zone considerations (if the student is outside Australia), and the staff role responsible for maintaining contact (International Liaison Officer or delegate).

At a minimum, the School will:

- Maintain current student and parent/guardian contact details and emergency contact details, and confirm these at least every 6 months (or sooner if notified of a change).
- Conduct scheduled check-ins with the student appropriate to age, study load and risk factors), including confirmation of wellbeing, accommodation/welfare status (where applicable), and access to learning support.
- Implement a non-response escalation process where the student does not respond within the agreed timeframe: (1) attempt contact via at least two channels on the same day; (2) within 24 hours attempt phone contact and notify the student’s parent/guardian and, where applicable, homestay provider/approved welfare carer; (3) within 48 hours, if there are welfare concerns or the student cannot be located, escalate as a critical incident and follow the “Missing Student” process (including contacting police/emergency services as appropriate).
- Refer the student to appropriate internal and external support services (including Counsellors/Psychologists and health services) where wellbeing concerns are identified, and provide information on how to access emergency services.
- Document all contact attempts, responses, concerns raised, referrals, and actions taken on the student file, including dates/times, the staff member responsible, and any follow-up required.

Managing Critical Incidents – Emergencies in Australia and in a Student’s Home Country (National Code Standard 6)

Critical incident management applies to traumatic events or threats of such events occurring within Australia or outside Australia (including in a student’s home country). The School will respond promptly to protect the student’s safety and welfare, communicate with relevant parties, and maintain appropriate records in line with ESOS and the National Code.

In all emergency situations, the School will:

- Take immediate action to address safety risks (including calling 000 in Australia, or local emergency services overseas where feasible and appropriate).
- Notify and convene (as required) the emergency communication group to coordinate decisions, communications and student support, including the International Liaison Officer and relevant Head of School/Director of Students.
- Verify the incident information using reliable sources where possible (e.g., direct contact with the student/family, host family, agent, medical provider, police, or official advice) and manage information sharing on a need-to-know basis.
- Contact the student's parent(s)/guardian as soon as practicable (unless doing so would increase risk to the student), and where relevant notify the homestay provider/approved welfare carer.
- For emergencies affecting the student or the student's immediate family overseas (including in the student's home country), the School will support the student to access appropriate assistance, which may include facilitating contact with the relevant embassy/consulate (where appropriate), assisting the student to access counselling support, and supporting academic adjustments consistent with School policies (e.g., leave, extensions, or deferral/suspension processes where applicable).
- Where a critical incident results in a change to enrolment status, welfare arrangements, or has the potential to impact visa conditions, the School will follow relevant internal processes and meet any required external reporting and PRISMS-related actions within required timeframes.
- Record all actions and communications (including dates/times, parties contacted, decisions made and supports provided) and undertake a post-incident debrief to identify any required follow-up actions.

Students Under 18 Years of Age – Emergency Situations and Disruption to Welfare Arrangements

For overseas students under 18 years of age, the School will ensure appropriate welfare and accommodation arrangements are maintained at all times. Where an emergency occurs, or where the School becomes aware that welfare arrangements (including CAAW-related arrangements) are disrupted, the School will implement the following process to protect the student's safety and wellbeing.

The process includes:

- Immediate safety check: confirm the student's current location and immediate safety; if there is an imminent risk, call 000 (or relevant emergency services) and ensure the student is supervised by a responsible adult.
- Immediate notification: contact the parent(s)/guardian as soon as practicable and, where applicable, the homestay provider/approved welfare carer to confirm the situation and agree immediate next steps.
- Interim welfare arrangements: where existing welfare arrangements cannot be maintained, implement immediate interim arrangements to ensure continuous welfare and accommodation (e.g., alternative approved homestay placement, placement with an approved relative, or other approved arrangement) until longer-term arrangements are confirmed.
- Regulatory notification: where required, notify relevant authorities and update required systems (including PRISMS where applicable) within required timeframes (including within 24 hours where the School is required to report a change or where a critical incident has the potential to impact visa conditions or welfare responsibilities).
- Ongoing support and monitoring: provide access to counselling and wellbeing supports, monitor the student closely, and confirm that welfare arrangements remain appropriate and effective.
- Record keeping: document the trigger for the disruption, safety actions taken, interim and final welfare arrangements, approvals, notifications made, and all communications with dates and times, and file these records on the student file.

Critical Incident Whilst at School

Should a whole School incident occur onsite at BGS, all students, including international students, will follow the instructions of their classroom teacher and emergency wardens in line with the School's Emergency Management Plan.

If a health or safety incident occurs involving an individual student whilst on the School grounds, during the course of a School day or during a school related activity, the student should present to a First Aid room or seek assistance from their House Tutor (classroom teacher in Junior school), Head of House (Deputy Headmaster in Junior School), Director of Students (Deputy Head of Junior School) or School Counsellor/Psychologist.

The School will follow all protocols as specified within school policies in order to ensure the health and safety of the student and to appropriately record (in line with ESOS Standards) and report the incident. This may include the contacting of emergency services or DFFH if required.

If such an incident occurs that results in the potential breach of visa conditions, the School will advise the relevant authority within 24 hours.

Critical Incident Outside of School Hours

Should an incident occur to an international student outside of normal School hours and whilst not involved in a School-related activity, the student should contact the BGS International Liaison Officer in the first instance. If they cannot contact the International Liaison Officer, then the Director of Students (Deputy Head of Junior School) will be available to support the student. All contact details for out of hours emergencies are provided to all international students and their parents via the BGS Student Safety card.

The International Liaison Officer is required to communicate with the School immediately regarding all incidents involving an international student. As soon as the School is informed of the incident, the School will call any appropriate emergency services and/or 000 for support.

The Director of Students (Deputy Head of Junior School) will then contact the following people and establish an emergency communication group:

- Appropriate Head of School
- International Liaison Officer
- Homestay family (if applicable)
- Nominated School support person assigned to support the student and family
- School Counsellor/Psychologist
- Risk and Compliance team
- School Health Officer (If deemed necessary)
- Head of House

The student's nominated School support person or Director of Students (Deputy Head of Junior School) will contact the student's parents to explain the situation and to assure them that the safety and wellbeing of the student is priority.

As determined by the emergency communication group, contact will be made with the appropriate authorities, such as DFFH, Department of Home Affairs, counselling services, etc.

Brighton Grammar School will endeavour to manage and resolve all incidents with the student and their family or homestay providers in a timely manner. Details will be appropriately recorded in line with ESOS Standards.

Missing Student

If a student is not in attendance at school the school will contact the parent or host family before midday to seek an explanation. All reasonable attempts will be made to contact and locate the student immediately. If the student cannot be contacted and the school has concerns for his welfare as a result of the non-contact, the Director of Students (Deputy Head of Junior School) will engage the relevant emergency services to assist.

The school will then contact the parents, homestay hosts and appropriate government departments to report the situation and seek assistance. The Director of Students (Deputy Head of Junior School) will convene the emergency communication group to assist in the immediate situation and to offer further ongoing support to the student and family once the situation has been resolved.

Ongoing Support

A post incident debrief will be undertaken with the emergency communication group and Headmaster once the incident has been resolved.

Ongoing support will be provided to the student and family, this may include:

- Supporting the student through ongoing medical treatment whether physical or psychological;
- Working with the family and homestay provider to ensure ongoing safety;
- Finding alternative accommodation if required. If CAAW arrangements are compromised as a result of any critical incident, the School will work closely with the student and family to seek immediate and alternate arrangements in order to maintain the ongoing safety and welfare of the student. This may include placing the child with an approved relative and notifying immigration of the situation (within 24 hours).
- Advising and working with Immigration departments to assist with or resolve any underlying issues;
- Assisting the student academically;
- Consultation with the student and parent to establish a mutually agreeable outcome should the student be unable to complete their studies due to the incident.

If a course transfer, cancellation or suspension has resulted due to an incident, procedures outlined in the Transfer, Defer, Suspend or Cancel Enrolment Policy will be enacted, this includes the communication of subsequent arrangements to the required authorities and in PRISMS. However, the School will continue to be responsible for the welfare of the student until all arrangements are finalised.

All communications including timelines of key contacts and communications will be documented by the Director of Students (Deputy Head of Junior School) and saved in the student's file.

Record Keeping

We acknowledge that good records management practices are a critical element of International Student Safety and Wellbeing and manage our records in accordance with our Records Management Policy and Procedures which are aligned with the Public Record Office Victoria Recordkeeping Standards and the Records, Retention and Disposal Schedule for Non- Government Schools guidelines.

All records and prescribed information about the accepted enrolment of each International Students are kept as set out in section 21 of the ESOS Act. All written agreements as well as receipts of payments made by students' families under the written agreement will be kept for a minimum of 2 years after the person ceases to be an enrolled student. Brighton Grammar will review all records relating to accepted international students every 6 months to ensure accuracy. This includes written confirmation of:

- Students current Australian residential address
- Students contact phone number.
- Students email address.

PRISMS - (Provider Registration and International Student Management System)

To ensure compliance with Section 21 of the ESOS Act, CRICOS Brighton Grammar maintains an up-to-date and accurate student register that records details of all enrolled overseas students. This includes promptly updating enrolment information such as course commencement dates, changes to student details, and course completions or terminations. The school will report any variations through PRISMS within the required frames specified by the ESOS legislation. Maintaining the currency of this register is essential for meeting the provider's obligations under the Act, supporting visa integrity, and safeguarding the rights and welfare of international students.

Changes to Registration Status

In accordance with CRICOS Standard 11.2, any change to the ownership, directorship, or key

management of the provider must be identified and reported without delay to the Department. Staff or Council members who become aware of such changes are required to notify the Principal immediately. The Principal will verify the details of the change, including the effective date and supporting documentation. Once verified, the Principal or delegate will notify the Department of Education through PRISMS or another prescribed channel within 10 working days of the change. Copies of all notifications, supporting evidence, and acknowledgement from the Department must be securely stored for a minimum of seven years.

The School will retain records as per the BGS Records and Data Management Policy, Records, Retention and Destruction Schedule, BGS Privacy Policy and ESOS Act. Records are kept on the student's file on the School database. Retention practices include:

Documentation	Criteria	Retention timeline
Attendance records, absence information, sign in and sign out registers	Homestay Students	Indefinitely
Attendance records, absence information, sign in and sign out registers	International students not in homestay	75 years from date of birth
Teaching and Learning – academic results, student reports	Homestay Students	Indefinitely
Teaching and Learning – academic results, student reports	International students not in homestay	75 years from date of birth
Co-curricular activities – participation, injury and accident records	Homestay Students	Indefinitely
Co-curricular activities – participation, injury and accident records	International students not in homestay	75 years from date of birth
Pastoral records, including orientation / transition checklists, critical incident records, behavioural reports	Homestay Students	Indefinitely
Pastoral records, including orientation / transition checklists, critical incident records, behavioural reports	International students not in homestay	75 years from date of birth
Details of any complaints or appeals	Homestay Students	Indefinitely
Details of any complaints or appeals	International students not in homestay	75 years from date of birth
Detailed records and copies of all original enrolment communication, which may include application records, Conditional Letters of Offer and Written Agreements, and payment receipts provided	All international students	At least 2 years after the student ceases to study at BGS (hard copies) Indefinitely (digital summary)
Records and communication related to changes to enrolment, which may include initial request documentation, decision making process and outcomes	All international students	At least 2 years after the student ceases to study at BGS (hard copies) Indefinitely (digital summary)
All departure/exit records	All international students	25 years from the student's date of birth (must be destroyed)

Supporting Documentation

- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Education Services for Overseas Students Act 2000
- International Students – Enrolment Policy
- International Students – Refund Policy
- International Students – Academics and Attendance Policy
- International Students – Student Support Services and Critical Incident Policy
- International Students – Homestay Accommodation Policy
- International Students – Transfer, Defer, Suspend or Cancel Enrolment Policy
- International Students – Complaints and Appeals Policy
- International Students – Conditional Letter of Offer and Written Agreement (Template)
- International Students Handbook
- International Students – Homestay Accommodation Request (Template)
- International Students – Formal Complaint form (Template). *NOTE: Also embedded in International Students – Complaints and Appeals Policy Appendix*
- International Students – Education Agent Agreement (Template)
- International Students – Student Safety Card (Template)
- Orientation Checklist for International Students
- BGS Business Notice and General Regulations
- BGS Records and Data Management Policy
- BGS Data Records, Retention and Destruction Schedule
- BGS Privacy Policy
- BGS Child Safety and Wellbeing Policy
- BGS Child Safety Code of Conduct
- BGS Child Safety and Wellbeing Reporting Obligations Policy
- BGS Child Safety and Wellbeing Complaints Process
- BGS Whistleblower Policy
- BGS Critical Incident Management Policy
- BGS Emergency Management Plan

This Policy is a controlled document. Any printing of this document is uncontrolled. Please refer to the school portal for the latest version of this policy	
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