

International Students – Enrolment Policy

[ESOS Act – National Code Standards 1, 2,3, 4]

- 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 seeks to ensure that there is a consistently communicated and standardised approach to enrolling prospective international students at BGS and provides that students are enrolled at the School in a manner that is fair, consistent and transparent. The Policy sets out the basis on which applications for admission are assessed and accepted, and the process from application to confirmation of enrolment. It is expected that all parents and guardians bearing legal parental responsibility for a prospective student (Parent(s)) will jointly undertake the admissions and enrolment process on behalf of the prospective student.

This Policy outlines the enrolment process for international students in line with Standards 1, 2, 3 and 4:

- Standard 1: Marketing information and practices. Registered providers must uphold the integrity and reputation of Australia's education industry by ensuring the marketing of their courses and services is not false or misleading.
- Standard 2: Recruitment of an overseas student. Registered providers must recruit responsibly and ensure that overseas students are appropriately qualified for the course they are seeking to enrol in. Overseas students must have sufficient information to enable them to make informed decisions about studying with their chosen registered provider.
- Standard 3: Formalisation of enrolment and written agreements. The obligations and rights of both registered providers and overseas students must be clearly set out in a formal written agreement between the two parties.
- Standard 4: Education Agents. Registered providers must ensure that their education agents act

ethically, honestly and in the best interest of overseas students and uphold the reputation of Australia's international education sector.

Purpose

BGS is a registered CRICOS provider (00132K) with the VQRA. This allows BGS to accept enrolments of up to 70 International Students.

BGS is approved to provide both primary and secondary school curriculum to international students and will accept enrolment applications from boys studying in Prep through to Year 12 (VCE). All enrolments are subject to the outcome of the enrolment process and the availability of places in the required year level.

This policy sets out the School's approach in the following areas:

- Admissions Process
- International Education Agents
- Recognition of Prior Learning

Priority and Suitability

Priority

Applications for enrolment will be accepted at the discretion of the School, applications may be given priority for enrolment based on factors including (not in any particular order):

- Family or other association with the School;
- Date of a properly completed application
- Siblings currently or previously at the School;
- Academic record and potential;
- Co-curricular and leadership record and potential;
- Sons of permanent staff;
- Principles and values alignment;
- Willingness and ability to contribute to the wider life of the School;
- Good character, as evidenced by behaviours, attitudes and willingness to serve for the greater good;
- Interview;
- Returning students who were offered a priority at the time of departure.

Suitability

Mandatory requirements for prospective students to be considered for enrolment at BGS are that they must:

- Meet all Government Visa entry requirements,
- Have appropriate [Overseas Health Cover](#) for the full term of their visa, and
- Meet the AEAS English language requirements - as per below and as listed in the International Handbook.

AEAS English Language Entry Requirements <i>Only testing via AEAS will be accepted*</i> * Brighton Grammar School reserves the right, at its discretion, to require AEAS testing as a condition of enrolment. The School may accept alternative forms of assessment or waive this requirement entirely where appropriate.	o Junior School	AEAS Minimum score of 46
	o Year 7-8	AEAS Minimum score of 60
	o Year 9	AEAS Minimum score of 70
	o Year 10	AEAS Minimum score of 75
	o Year 11-12	AEAS Minimum score of 85

The programs BGS run, the way BGS teach and the facilities BGS build are all about boys. In line with the Equal Opportunities Act 2010 (Commonwealth), the School reserves the right to limit enrolment to those assigned to the male sex at birth.

Where information obtained by the School suggests:

- A profile of misconduct, illegal activities or anti-social behaviours that indicate the prospective student's enrolment at the School is likely to be detrimental to other students, the staff or the School, or
- The parents/guardians may not be able to meet the financial commitment required by having a student at the School, or
- The level of English language proficiency of the prospective student is not adequate to fully participate in School life, both academically and socially,

Notwithstanding that the prospective student may be the sibling of a current student, the School may decline to proceed any further with the enrolment process.

Learning Support Requirements

The primary consideration is to ensure that the School is able to support the learning requirements of the prospective student, whilst continuing to support the learning requirements of all other students.

As part of the Enrolment Questionnaire, Parent(s) will be asked to declare any learning support requirements for the prospective student. This includes Learning Disorders, Physical Disabilities and Developmental Disorders. The School will require the parents/guardians to provide medical, psychological or other reports from specialists outside the school. These details are reasonably assumed to indicate a possible need for either education support services or for some measures or actions to assist the student to participate in the School's courses or programs and/or to use the School's facilities or services.

In respect of any prospective enrolment, the School reserves the right to have members of its staff make further enquires to better understand the prospective student's learning support requirements.

The School will then seek to identify the exact nature of the prospective student's needs, and the strategies required to address them. Having obtained this information, the School will determine whether the prospective student, if enrolled, would require some measures or adjustments to assist them to participate in the School's courses or programs and/or to use the School's facilities or services on the same basis as a student without the disability or special learning need.

Where the School determines that the prospective student would require some such measures or adjustments, the School will seek to identify the nature of the measures or adjustments required and whether they are reasonable. In assessing whether a particular measure or adjustment for a particular student is reasonable, the School will comply with the standards outlined in the Disability Standards for Education 2005 (Commonwealth) and Equal Opportunity Act 2010 (Commonwealth).

Where the School determines that the learning needs of the prospective student cannot be met at BGS through reasonable measures or adjustments, the School may decline to offer a position for the prospective student.

Admissions Process

Application to and enrolment at Brighton Grammar School is a four-step process, as below.

Step 1: Submit an application

Apply online via the School website: [Apply now - international student enrolment form | Brighton Grammar](#).

Parents must complete the digital International Student Admission form, and then submit the requested copies of the current Visa, Overseas Health Cover, and results from AEAS testing directly to the Admissions Coordinator for assessment.

Please note:

- An application is a pre-requisite for admission but not a promise of admission.
- The online application must be completed by, or with the consent of, all adults bearing parental / legal responsibility
 - Please note that the School is unable to involve itself in any family matters. In the case of all families, including divorced or separated parents, it is the School's assumption and understanding that prior to submitting an application, all parents/guardians are in agreement to the application and potential enrolment of their son.
 - Unless otherwise stated in Family Court Orders or equivalent, all parents/guardians are required to sign the online application to indicate their consent. Should a place be offered, all parents/guardians must sign the Enrolment Agreement.
- The School may offer a place to any prospective student, irrespective of the date of application.
- A non-refundable application fee of \$250 applies and is payable at the time of application.
- Most year levels are over-subscribed, and applicants are added to an application register.

Step 2: Application processing

- Applications are considered for all year levels.
- All applications are processed and placed on the application list for the selected year of entry.
- Acknowledgement of receipt of the online application and application fee will be sent to the nominated email address.
- Not all prospective students will be made an offer of enrolment, due to demand for places exceeding the number of places available.
- Parents/guardians of prospective students seeking enrolment for a non-core entry level will only be contacted by the School if there is a possibility of a place for the prospective student.
- An application may be cancelled if no confirmation of interest is received by the required date.
- The admissions process may vary by year level, and additional documentation may be required, including translated reports and academic transcripts.
- If the documentation meets the School's requirements and there may be an available place in the required year level, an interview will be arranged with the appropriate Head of School.

Step 3: Offers of enrolment

Following the interview, the prospective student may be made an offer of enrolment, or placed on a waiting list.

Offers of enrolment are conditional upon the following:

- An available place in the required year level of entry
- Satisfying the required English language requirements for Year 5 and above
- Attendance certificate from previous study at an Australian School (if applicable)
- Certified copy of satisfactory school reports (in English)
- Interview with Head of School

Step 4: Confirmation of enrolment

If the School is able to make an offer of enrolment, this will be issued in a Conditional Letter of Offer and Written Agreement. The Conditional Letter of Offer and Written Agreement:

- Outlines the details of the Offer
- Lists the steps required to accept the offer and confirm the place, inclusive of:
 - Signing and returning the Conditional Letter of Offer and Written Agreement
 - Making payment of the non-refundable enrolment fee
 - The additional supporting documentation to be provided
- Provides an outline of the Financial Commitment for the duration of the enrolment (within Certificate of Enrolment dates)
- Gives details of and links to the binding documents that are acknowledged by signing and returning the Conditional Letter of Offer and Written Agreement, inclusive of:
 - Business Notice and General Regulations
 - Student Code of Conduct
 - Parent and School Community Code of Conduct
 - Schedule of Fees
 - International Student – Enrolment Policy
 - International Student – Refund Policy
 - International Student – Academics and Attendance Policy
 - International Student – Complaints and Appeals Policy
 - International Student – Homestay Accommodation Policy
 - International Student – Student Support Services and Critical Incident Policy
 - International Student – Transfer, Defer, Suspend or Cancel Enrolment Policy
- Notes additional available information, for example:
 - International Handbook
 - Other BGS policies, including the Privacy Policy

An enrolment is confirmed and a binding Enrolment Agreement entered in to when an offer is accepted by the execution of the following:

1. Parent(s) thoroughly reading, understanding and signing the Conditional Letter of Offer and Written Agreement, which includes also acknowledging additional BGS policies as listed
2. Parent(s) sending the following documents to the Admissions Coordinator by email:
 - A signed copy of the Conditional Letter of Offer and Written Agreement
 - A copy of the Student's birth certificate
 - A copy of the Student's immunisation certificate, certified by a Medical Practitioner (GP) – Junior School students only
 - Any current visa documentation
 - Overseas Health Cover certificate
3. Payment of the non-refundable fee of \$2350 - made up of a \$2000 confirmation of enrolment fee and \$350 for lifetime membership of the Old Brighton Grammarians' Society, as detailed in the Business Notice and General Regulations.

International Education Agents

The School welcomes the use of Agencies when families are sourcing education in Australia, and will work with authorised Agents when required. BGS will not outsource any enrolment duties to any other institution and will process all CoE and CAAW documentation in PRISMs through the BGS Admissions and Compliance departments.

BGS will not pay an education agent a commission for the recruitment of an overseas student who is transferring from another provider.

Agents are expected to communicate in the first instance directly with the Admissions Coordinator and provide all requested paperwork in a timely manner in order to secure enrolment of the International Student. Payment will only be made to the Agent once the School has received the student's second Semester fees. which are due at the end of Term 2.

Agent applications will only be accepted if the agent maintains ethical and honest processes and is working in the best interest of the student. All agency activities must, at all times, maintain confidentiality, transparency and act in good faith.

Brighton Grammar School may authorise an Agent to represent the School. In doing so the School will enter into a written agreement with the Agent, which must outline:

- The School's responsibilities, in line with ESOS Act and National Code 2018.
- The requirements of the Agent in representing BGS.
- The School's processes for monitoring the Agent's activities and ensuring prospective students are provided with accurate and up to date information.
- The corrective actions that may be taken and the grounds for termination of the written agreement with the Agent.
- The circumstances in which information about the Agent may be disclosed by the School and the Commonwealth or State/Territory agencies.
- The obligations upon the Agent to act in line with the values of confidentiality, transparency and professionalism, and behaviours as listed above.

The School will maintain a register of all agencies and key contacts within them. Details will be maintained in PRISMS and will also be available on the school website. Brighton Grammar School will actively monitor the performance and conduct of all authorised education agents on an ongoing basis. Monitoring may include periodic review of application quality, student outcomes, compliance trends, complaints, and verification of information provided to prospective students. Records of monitoring activities and outcomes will be retained in accordance with CRICOS record-keeping requirements.

The School may require an Agent to undertake immediate corrective action should there be any concerns regarding their proficiency or conduct. The requirement for corrective action is at the School's discretion and the School may immediately suspend the Agent's authority to recruit or represent the School while the prescribed corrective action is undertaken. Corrective action may include training, remediation and/or a compliance plan with a specified time-frame, including but not limited to:

- On-shore training for the Agent
- Requiring the Agent to complete the AEI online Agent Training Course

The School will not engage with, will cease to engage with, and where applicable, will terminate an agreement with, an Agent if it becomes aware that:

- There is a conflict of interest such as:
 - Double charging of fees to the student's family and the school
 - Financial interest in the arrangement by the Agent
 - Personal relationships between an Agent and employee of the school
- The Agent does not have the appropriate knowledge and understanding for the Australian International Education and Training Agent Code of Ethics.
- Providing migration advice, unless that education agent is authorised to do so under the Migration Act 1958
- Misleading advice or recruitment practices has been provided to the student, the student's family or the school.
- Dishonest recruitment practices have been engaged in or previously engaged in, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 of the National Code
- The Agent is found to be creating CoE's in PRISMS for non-bona fide students or facilitating enrolments knowing there will be non-compliance of visa conditions.

Recognition of Prior Learning and Granting Course Credit

Brighton Grammar does not offer course credit in the Junior School or from Year 7 to Year 9. For students who are transferring in to the School in Years 10 to 12 that have already studied a VCE subject with another Victorian Secondary School, the results achieved in this subject will be recognised as prior learning and considered valid under course credit guidelines.

Students must provide proof of course completion and their results prior to the credit being recognised. This can be in the form of past school reports, a letter from the previous schools outlining the details of subjects studied and results obtained, or official results from the VCAA. If a student believes that there is another reason for granting credit then a submission should be made in writing to the Headmaster for consideration.

Further discussions regarding the granting of course credit will be undertaken directly with the student in the initial enrolment interview. The school will provide the approval and recognition of course credit in writing, or a detailed reason why the application for course credit has not been recognised.

Generally, the recognition of course credit will not alter the duration of the course. However, if this is found to be the case the Director of Students will, in consultation with the Headmaster, Compliance Coordinator and student's family outline this exception and ensure the CoE is updated in PRISMs to reflect the variation.

All information and details on course credit will be kept on the student file in the school's database and retained for a minimum of 2 years after the individual ceases to be a student.

For further information on course credit recognition Brighton Grammar School recommends the following website:

<https://www.vcaa.vic.edu.au/assessment/results/credit-recognition/credit-vce/Pages/Index.aspx>

Fees and Additional Costs

All International fee-paying families must abide by the terms set out in the Business Notice and General Regulations and the International Students Handbook.

Brighton Grammar School will ensure that tuition fees for overseas students are set, disclosed, invoiced and (where applicable) varied only in a manner that is consistent with the student's written agreement and the provider's obligations under the ESOS Act, including sections 28 and 29.

Deferring, Suspending or Cancelling an Enrolment

It may be possible to defer a prospective student's start date. Please refer to the International Student – Defer, Suspend or Cancel Enrolment Policy.

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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