ACCOMMODATION SUPERVISION AND STUDENT WELFARE PROCEDURE

Under 18 Junior Program and Short-Term Study Tours

1. Purpose

The purpose of this procedure is for The Lan-Grove Office Training Centre Pty Ltd, trading as The Sydney Business and Travel Academy, SBTA Culinary Institute, SBTA Community Care and The Sydney English Language Academy (collectively referred to as "The Academy") to establish clear operational requirements for the accommodation supervision, safety and welfare of students under 18 years of age participating in The Academy's Junior Programs and short-term study tours.

The Academy recognises that accommodation arrangements may involve hotels, homestays or other suitable accommodation organised by The Academy, approved accommodation partners, parents/legal guardians, overseas schools or authorised travel organisers.

This procedure establishes the responsibilities of The Academy and other relevant parties, ensuring appropriate safeguards, supervision arrangements, emergency contact procedures and student welfare measures are in place.

The Academy is committed to protecting students from foreseeable harm and responding promptly to any accommodation-related safety or welfare concerns.

2. Scope

This procedure applies to students aged 12–17 participating in short-term study tours and Junior Programs delivered in Sydney, Brisbane and the Gold Coast.

It applies to Academy staff, approved group leaders, accommodation coordinators, relevant contractors and third-party providers involved in accommodation or student welfare arrangements.

Accommodation may be arranged through one of the following arrangements:

2.1 Academy-Arranged Accommodation

Accommodation booked, organised or contracted directly by The Academy, including hotels and homestays. The Academy is responsible for ensuring that relevant screening, suitability, supervision, monitoring and emergency arrangements are established.

2.2 Third-Party or Partner-Arranged Accommodation

Accommodation organised by an overseas school, travel organiser or contracted accommodation provider as part of an agreed study tour arrangement. Responsibilities for screening, suitability assessments, supervision, monitoring and emergency response must be identified and documented in writing.

2.3 Independently Arranged Accommodation

Accommodation arranged independently by parents/legal guardians, overseas schools or authorised travel organisers, where The Academy has not been engaged to organise, approve or manage the accommodation.

In these circumstances, routine accommodation supervision outside scheduled Academy activities remains with the designated responsible adult and accommodation organiser under the agreed arrangements, subject to applicable law.

The Academy will obtain relevant accommodation and emergency contact information and respond appropriately to any child safety or welfare concerns reported to it.

The Academy's obligations during scheduled classes, excursions, supervised transport and other Academy-organised activities remain unchanged.

3. General Accommodation Supervision Principles

All accommodation arrangements involving minors must support the safety and wellbeing of students.

The following principles apply:

- Students must have clearly identified responsible adults and emergency contacts.
- Accommodation and supervision responsibilities must be established before student arrival.
- Students must receive appropriate information about accommodation rules and emergency procedures.
- Suitable arrangements must be established for travel between accommodation and program activities.
- Students must not travel independently unless a specific arrangement is lawfully authorised and expressly approved under the program's supervision requirements.
- Student health, medical conditions, allergies and other relevant support needs must be communicated to responsible persons on a need-to-know basis.
- Any allegation or indication of abuse, neglect, exploitation or unsafe accommodation must be addressed immediately.
- A student must not be returned to accommodation where an identified serious safety risk remains unresolved.

The Academy will maintain a 24-hour emergency contact arrangement during each study tour.

4. Accommodation Selection and Suitability Requirements

4.1 Academy-Arranged Hotels

Before approving a hotel for under-18 accommodation, The Academy must ensure that:

- The hotel is situated in a reasonably safe and accessible location.
- Appropriate building security and access controls are available.
- Emergency evacuation procedures are established.
- Suitable room allocation and supervision arrangements can be implemented.
- Emergency assistance is accessible, including appropriate after-hours hotel contact arrangements.
- The hotel has been advised that minors will be accommodated as part of an organised educational group.
- Relevant accommodation arrangements are confirmed in writing.

4.2 Academy-Arranged Homestays

Where The Academy arranges homestay accommodation, the requirements of its Homestay Screening, Approval and Monitoring Policy must be followed.

These include, where applicable:

- Host family application and identity verification.
- Assessment and verification of applicable NSW Working with Children Check or Queensland Blue Card requirements.
- Accommodation suitability and safety inspections.
- Confirmation of appropriate sleeping, bathroom and household arrangements.
- Verification of host family contact and emergency information.
- Assessment of supervision and transport arrangements.
- Communication of relevant student medical and dietary requirements.
- Written host family agreements and student welfare responsibilities.
- Student arrival and ongoing welfare monitoring.

A homestay must not be described as inspected, screened or approved by The Academy unless the relevant checks have actually been completed and documented.

4.3 Independently Arranged Accommodation

Where accommodation is independently arranged by parents/legal guardians, overseas schools or authorised travel organisers, The Academy will request relevant information before the student commences the program.

This includes:

- Host family or accommodation provider's name.
- Residential accommodation address.
- Host family or accommodation contact details.
- Name and contact details of the designated responsible adult.
- Arrangements for supervision outside scheduled Academy activities.
- Arrangements for student transport and collection from designated meeting points.
- After-hours emergency contact details.
- Written confirmation from the responsible organiser regarding accommodation suitability and applicable child safety screening arrangements.

The Academy may request supporting documents where necessary to address identified safety or welfare risks.

Receipt of these documents does not automatically constitute inspection, approval or management of independently arranged accommodation by The Academy.

Where information provided identifies an unresolved safety risk, management must assess the matter and determine appropriate protective action before the student participates in the relevant arrangements.

5. Supervisor and Responsible Adult Allocation

5.1 Academy-Arranged Accommodation

Where The Academy is responsible for accommodation supervision, a designated Lead Supervisor or accommodation coordinator must be identified before student arrival.

The responsible supervisor must:

- Meet applicable child-related work screening requirements.
- Understand emergency and child protection procedures.
- Have access to student emergency contact information.
- Be familiar with accommodation arrangements and student locations.
- Ensure appropriate supervision and welfare monitoring are maintained.
- Report safety or behavioural concerns promptly.
- Arrange a suitable replacement or backup contact when unavailable.

For hotel-based groups, supervising staff should be accommodated close to students where reasonably practicable and consistent with the approved risk assessment.

5.2 Independently Arranged Accommodation

Where accommodation is independently arranged, the parent/legal guardian or accommodation organiser must identify the responsible adult supervising the student outside Academy activities.

The Academy will record the responsible adult's details and confirm the arrangements for student arrival, departure, transport and emergency communication.

The Academy does not automatically provide overnight accommodation supervision for independently arranged homestays.

This does not remove The Academy's responsibility to respond appropriately to safety concerns arising during its programs or otherwise brought to its attention.

6. Accommodation Allocation and Student Records

For Academy-arranged accommodation, The Academy must maintain appropriate student accommodation records, including:

- Accommodation provider and address.
- Student room or homestay allocation.
- Responsible supervisor or host family details.
- Emergency contact information.
- Arrival and departure dates.
- Relevant medical and welfare arrangements.
- Applicable transport and supervision responsibilities.

For hotel accommodation, room allocations should consider student age, privacy, gender, individual safety needs and appropriate separation from unrelated adults.

Students must not change accommodation or allocated rooms without the required approval.

For independently arranged accommodation, The Academy will retain the information supplied by the responsible organiser and record any relevant changes notified during the tour.

7. Student Arrival and Accommodation Orientation

Before or upon arrival, students must receive an appropriate accommodation orientation from the party responsible for the accommodation.

The orientation should cover:

- Accommodation address and contact information.
- Introduction to the responsible adult or supervisor.
- Household or hotel rules.
- Curfew and supervision arrangements.
- Emergency exits and evacuation procedures.
- How to seek help if feeling unsafe or uncomfortable.
- Transport and collection arrangements.
- Attendance requirements and meeting points for Academy activities.
- Emergency contact numbers, including The Academy's 24-hour contact.

Where the accommodation is independently arranged, The Academy will confirm that the student and responsible organiser have received the necessary program meeting and emergency contact information.

8. Student Behaviour Expectations

All students must comply with The Academy's Code of Conduct for Minors, together with reasonable accommodation rules communicated by the responsible accommodation provider.

Students must:

- Treat host families, hotel employees, supervisors and other residents respectfully.
- Follow approved curfew and supervision arrangements.
- Respect the privacy and property of others.
- Keep their designated responsible adult informed of relevant safety or welfare concerns.
- Attend scheduled program activities punctually.
- Follow agreed transport and collection procedures.
- Inform The Academy promptly if accommodation concerns affect their safety or participation.

Students must not:

- Leave accommodation without the approval required under their supervision arrangements.
- Invite unauthorised visitors.
- Engage in bullying, harassment, intimidation or threatening behaviour.
- Possess or consume alcohol or prohibited substances.
- Change accommodation without the necessary approval.
- Engage in behaviour placing themselves or others at risk.

Serious incidents must be reported promptly and handled in accordance with The Academy's child safety and complaints procedures.

9. Curfew and Overnight Supervision

9.1 Academy-Arranged Hotel Accommodation

Where The Academy provides hotel accommodation and supervision:

- A curfew must be established and communicated to students.
- Students must remain in assigned rooms after curfew unless authorised or requiring emergency assistance.
- Supervisors must conduct appropriate nightly welfare checks.
- An appropriately briefed supervisor or designated backup must be contactable overnight.
- Student absences must be investigated immediately.
- Appropriate records of overnight checks and incidents must be maintained.

Welfare checks must respect student privacy and dignity.

9.2 Academy-Arranged Homestays

Where The Academy arranges homestays, the host family must follow agreed supervision, curfew and welfare arrangements.

The Academy will undertake welfare monitoring in accordance with its Homestay Screening, Approval and Monitoring Policy.

9.3 Independently Arranged Accommodation

Where accommodation is independently arranged, overnight supervision and routine accommodation monitoring remain the responsibility of the designated responsible adult and accommodation organiser under the agreed arrangements, subject to applicable law.

The Academy will not conduct routine overnight inspections or welfare checks unless these services have been expressly agreed and appropriate arrangements established.

Students and parents may contact The Academy regarding urgent safety or welfare concerns, including those arising in independently arranged accommodation.

10. Morning Supervision and Student Attendance

For Academy-arranged accommodation, the designated supervisor must ensure students are accounted for before departure for scheduled activities.

Arrangements may include:

- Morning roll calls or welfare checks.
- Confirmation of student wellbeing.
- Verification of transport arrangements.
- Head counts before group departure.
- Notification of unexplained absences.

For independently arranged accommodation, the designated responsible adult or accommodation organiser must ensure students reach the agreed program meeting point in accordance with the documented arrangements.

The Academy will record attendance at its scheduled activities and promptly follow up on unexpected absences.

Where a student's whereabouts cannot be established, staff must activate the applicable missing-student emergency procedure.

11. Transport Between Accommodation and Program Activities

Students must travel between accommodation and program venues under the supervision arrangements approved for their particular study tour.

Where The Academy arranges transport, it must ensure:

- Approved transport arrangements are documented.
- Supervising staff are identified.

- Student attendance and head counts are completed.
- Designated pickup and drop-off locations are communicated.
- Appropriate procedures are in place for delays, missed pickups and emergencies.

Where accommodation is independently arranged, responsibility for transport to and from agreed Academy meeting points must be confirmed with the parent/legal guardian and responsible organiser.

Students must not be released at the end of an activity without complying with the approved handover arrangements.

12. Emergency Response in Accommodation

If an emergency occurs at accommodation, the responsible adult or supervisor must take immediate action to protect the student.

Actions may include:

1. Calling 000 for an emergency requiring Police, Fire or Ambulance assistance.
2. Following appropriate building evacuation procedures.
3. Moving students to a safe location where practicable.
4. Providing first aid within the responder's training.
5. Confirming the safety and whereabouts of affected students.
6. Contacting The Academy's designated emergency contact.
7. Notifying parents/legal guardians promptly where appropriate and safe.
8. Recording the incident and relevant actions.

Where an emergency arises in independently arranged accommodation, The Academy will respond within its responsibilities and coordinate with parents, responsible adults, emergency services and relevant authorities as necessary.

Immediate emergency assistance must not be delayed while seeking management approval.

13. Medical Situations and Student Wellbeing

Where a student becomes ill, injured or experiences a medical or psychological emergency:

- Immediate safety and medical needs must be assessed.
- Emergency services must be contacted where necessary.
- First aid must be provided by appropriately trained persons.
- Relevant medical information must be made available to treating professionals where appropriate.
- The Program Coordinator must be informed promptly.
- Parents/legal guardians must be notified as soon as appropriate.
- Suitable supervision and support must be maintained until a safe handover or appropriate care arrangement is confirmed.

For independently arranged accommodation, the host family or designated responsible adult must be contacted as appropriate to the circumstances.

If a student reports feeling unsafe in their accommodation, The Academy must assess the concern immediately and take appropriate safeguarding action.

A student must not be returned to accommodation considered unsafe while serious concerns remain unresolved.

14. Missing Student from Accommodation

Where a student under 18 cannot be located, the person identifying the absence must take immediate action.

1. Confirm the student's absence and last known location.
2. Notify the designated Lead Supervisor, Program Coordinator or responsible adult as appropriate.
3. Check the immediate area and attempt direct contact with the student, while ensuring other students remain supervised.
4. Contact the accommodation provider or relevant host family where appropriate.
5. Contact Police immediately where there is concern for the student's safety or welfare. There is no mandatory waiting period before reporting a missing child.
6. Notify the Chief Executive Officer and parent/legal guardian promptly, subject to safety considerations and any instructions from authorities.
7. Continue coordinating appropriate actions until the student is located and their wellbeing is confirmed.
8. Record all actions, communications and outcomes in an incident report.

This section must be read together with The Academy's Critical Incident and Emergency Management Plan.

15. Child Protection and Accommodation-Related Complaints

Any concern involving suspected abuse, grooming, neglect, exploitation, harassment, violence, inappropriate conduct or unsafe accommodation must be taken seriously and addressed promptly.

Staff must:

- Listen respectfully to the student.
- Assess immediate safety and welfare needs.
- Take appropriate protective action without delay.
- Avoid requiring the student to confront the person complained about.
- Notify an appropriate unconflicted senior staff member.
- Contact emergency services and make any legally required child protection reports without delay.
- Follow The Academy's Under-18 Complaints and Concerns Procedure.
- Maintain appropriate confidentiality and secure records.

Where the concern involves a host family member or designated responsible adult, that person must not be relied upon to provide safe supervision while the relevant risk is being assessed.

Where alternative accommodation or care is required, the Academy will coordinate appropriately with the responsible organiser, parent/legal guardian and relevant authorities, having regard to its legal and contractual responsibilities.

16. Documentation and Record Keeping

The Academy must retain appropriate records relevant to its accommodation responsibilities.

These may include:

- Accommodation and host family contact information.
- Written responsibility agreements.
- Screening and suitability verification where applicable.

- Room allocation or homestay placement records.
- Parent/guardian consent documentation.
- Transport and handover arrangements.
- Emergency contact information.
- Student welfare monitoring records.
- Incident and complaint records.
- Communication logs.
- Corrective actions and follow-up documentation.

For independently arranged accommodation, The Academy must distinguish between documents supplied by the responsible organiser and checks actually performed by The Academy.

Student personal, medical and safeguarding information must be stored securely and accessed only by authorised persons with a legitimate need.

17. Staff and Accommodation Provider Responsibilities

The Program Coordinator is responsible for ensuring relevant accommodation information, emergency contacts and supervision arrangements are confirmed before the study tour commences.

The designated Lead Supervisor is responsible for implementing the supervision arrangements allocated to The Academy.

Accommodation providers, host families and external organisers are responsible for carrying out the duties assigned to them under their agreements and applicable legal requirements.

The Chief Executive Officer provides executive oversight, ensures appropriate resources are available and oversees serious incidents requiring management intervention.

No agreement or delegation removes any duty or statutory obligation that applies directly to The Academy.

18. Breach of Procedure

A failure by Academy staff or representatives to comply with this procedure may result in:

- Immediate protective action.
- Removal or reassignment from supervisory duties.
- Internal investigation.
- Corrective training or performance management.
- Disciplinary action where warranted.
- Reporting to appropriate authorities where required.

Where concerns relate to an external accommodation provider, The Academy may require corrective action, suspend relevant arrangements or take other appropriate steps within its contractual and legal responsibilities.

Student safety and wellbeing must remain the primary consideration.

19. Procedure Review and Continuous Improvement

This procedure will be reviewed at least annually or earlier where:

- A serious accommodation-related incident occurs.
- Legislative or regulatory requirements change.

- A safeguarding concern identifies a procedural weakness.
- Accommodation delivery arrangements change significantly.
- Feedback from students, parents, host families or staff identifies opportunities for improvement.

The Academy will ensure the procedure remains consistent with its Child Protection and Child Safety Policy, Homestay Screening, Approval and Monitoring Policy, Critical Incident and Emergency Management Plan and other relevant Under-18 procedures.

Related Academy Policies and Procedures

- Child Protection and Child Safety Policy
- Working With Children Compliance Policy
- Homestay Screening, Approval and Monitoring Policy
- Code of Conduct for Minors
- Under-18 Complaints and Concerns Procedure
- Critical Incident and Emergency Management Plan
- 24-Hour Emergency Contact and Response Procedure
- Supervision Ratio and Student Monitoring Policy
- Excursion Risk Management Plan
- Hygiene, Food & Water Safety and Food Allergy Management Policy

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Version Control Table

Version No.	Author	Date developed/ updated	Approved by & date:	Effective date	Summary of changes
1.0	Jane Koch, CEO	14/08/2026	Marcela Haddad, PEO	14/08/2026	Initial creation
2.0	Jane Koch, CEO	26/10/2026	Marcela Haddad, PEO	26/10/2026	Updated to reflect accommodation including hotels and homestays