Homestay Risk Management Strategy

Developing character,
inspiring hope

STATEMENT OF COMMITMENT

SSC is committed to the protection of all children in its care. In order to manage the risks surrounding child protection the following strategies and procedures apply for the safety and protection of students in homestay.

The school will uphold the following principles under this strategy:

- SSC believes all homestay students have the right to feel safe, be listened to, be involved in decisions that affect them, have their cultural values respected, not be unjustly discriminated against on the basis of their status, activities, expressed opinions or beliefs of their parents or carers, and have their best interests considered.
- Students under the care of SSC should be provided with the knowledge and information they require to feel empowered to take action in the event of abuse or neglect.
- SSC acknowledges that homestay students are unique and valued individuals and deserve to be treated with care and respect.
- SSC recognises that respect for homestay students is the foundation upon which all policies and procedures are developed. We are committed to promoting their wellbeing and to protecting the security, safety and wellbeing of homestay students under our protection.

This Homestay Risk Management Strategy is evidence of SSC's commitment to the safety and wellbeing of children and the protection of children from harm in fulfilment of the requirements of section 3(1)(a) of the *Working with Children (Risk Management and Screening) Regulation 2011 (Qld)*.

PURPOSE OF THE STRATEGY

The purpose of this strategy is to provide written processes to ensure that homestay service providers and homestay hosts for SSC comply with legislation applying in Queensland about the care and protection of children in homestay arrangements.
In particular, the purpose of this Risk Management Strategy for Child Protection is to:
- promote the wellbeing of homestay students and to protect them from harm
- assist SSC to deliver a quality service to the young people in its care
  reduce the risk of harm to homestay students through written policies and procedures, including information and training, for homestay providers and hosts involved with SSC

This strategy should be read in conjunction with the SSC Child Protect Policy. GCSAC Homestay Policies and Procedures, SSC Homestay Code of Conduct, SSC Child Protection Risk Management Strategy, Child Protection Reporting Legislation and SSC Child Protection Policy

SCOPE

This strategy applies to: homestay service providers, homestay hosts, residents of homestay host homes, homestay students and visitors to homestay hosts' homes; and covers information about the College's commitment to child protection, procedures related to recruiting, selecting, training

and managing staff, including hosts and homestay service providers; policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines; risk identification and management; and communication and support.

LEGISLATION AND DEFINITIONS

Legislation

- *Working with Children (Risk Management and Screening) Act 2000 (Qld)*
- *Working with Children (Risk Management and Screening) Regulations 2011 (Qld)*
- *Child Protection Act 1999 (Qld)*
- *Education (General Provisions Act) 2006 (Qld)*
- *Education (General Provisions) Regulation 2006 (Qld)*
- *Education (Queensland College of Teachers) Act 2005 (Qld)*
- *Education (Accreditation of Non-State Schools) Act 2001 (Qld)*
- *Education (Accreditation of Non-State Schools) Regulation 2001 (Qld)*
- *Education Services for Overseas Students (ESOS) Act 2000 (Cth)*
- *National Code of Practice for Providers of Education and Training to Overseas Students 2007 (Cth)*
- *Queensland Development Code Mandatory Part 3.4*
- Child and Youth Risk Management Strategy Toolkit

DEFINITIONS

Guardian: of a child means a person who is recognised in law as having all the duties, powers, responsibilities and authority relating to the child that, by law, parents have relating to their children.

Homestay Service Provider: is the school, person or organisation arranging the homestay student's accommodation.

Homestay Host: is the volunteer or paid family who cares for the homestay student in their home.

Homestay Student: is the child or young person staying in the home of the homestay host.

SSC: Saint Stephen's College

GCSAC: Gold Coast Student Accommodation Centre

SSC expects homestay hosts to conduct themselves as follows:

Homestay hosts are expected to always behave in ways that promote the safety, welfare and well-being of children and young people. They must actively seek to prevent harm to children and young people, and to support those who have been harmed.

Specific responsibilities include:

- Homestay hosts should be conscious of situations where they are alone in an enclosed space with a student.
- When physical contact with a student is a necessary part of the teaching/learning residential experience, homestay hosts must exercise caution to ensure that the contact is appropriate and acceptable. Homestay hosts must always advise the student of what they intend doing and seek their consent.
- Homestay hosts must not develop a relationship with any student that is, or that can be interpreted as having a personal rather than a professional interest in a student.
- Homestay hosts must not have a romantic or sexual relationship with a student.
- All people and entities identified in the scope of this strategy are expected to reflect the highest standards of care in their behaviour towards and relationships with students. They must not under any circumstances engage in physical or emotional abuse or engage in sexual contact of any nature with a student living in accommodation approved by the school. It is irrelevant whether the conduct is consensual or non-consensual, or condoned by parents or caregivers. Failure to behave in an appropriate manner may result in criminal proceedings and/or disciplinary action, including dismissal of staff or suspension of a homestay host.

Selection and Training of Homestay Hosts

SSC recognises that risk management for children in homestay begins with the recruiting, screening and selection of the right people to provide an accommodation service, and continues by having consistent procedures in place for all stakeholders to follow, with adequate management and supervision to ensure they comply with these procedures.

SSC in conjunction with GCSAC, has a written policy on the selection, supervision and management of homestay hosts.

SELECTION

In choosing a homestay host SSC must comply with any relevant legislation and satisfy itself of the ability of the homestay host to care for the student in a safe and secure environment, and to provide age appropriate support and supervision for a child or adolescent attending SSC and adjusting to living in a new environment.

All homestay hosts must agree to a Code of Conduct and the SSC's Child Protection Policy. The GCSAC List of Policies and Procedures sets out clear criteria with regard to how it makes decisions about the suitability of a homestay situation. These criteria cover the minimum requirements with regard to:

- Blue Card requirements
- Access to transport
- Hygiene
- Cultural awareness
- School and homestay rules
- Services provided (e.g. meals, laundry)

All homestay families, and prospective families, are supplied with a copy of this Homestay Policies and Procedures

INDUCTION

SSC values the work of homestay hosts and recognises its responsibility to offer support and assistance to ensure that homestay arrangements work well for all concerned. Once homestay hosts have been successfully screened, all new homestay hosts receive an induction by GCSAC and the College.

The Induction process includes, but is not limited to:

- SSC's commitment to providing environments which are safe, caring and supportive to children and young people.
- SSC's policies and procedures relating to the protection from harm of students in homestay arrangements.
- Procedures to follow when harm is disclosed or suspected
- What is expected of them

In addition, homestay induction includes providing information to homestay hosts about the aims of the homestay program responsibilities of hosts **and** of the homestay students; possible problems that may arise and possible solutions; legal issues; contact points for homestay hosts needing assistance or in an emergency; and cultural differences of which they should be aware .[1]

MONITORING

Monitoring of the service provided by all homestay hosts is conducted through the following;

- Periodic surveys of homestay students, which includes an evaluation of their accommodation and welfare arrangement and taking action as required.
- Regular contact with the homestay host by phone and/or email to discuss and review the arrangement
- Conducting informal meeting with homestay students to monitor adjustment, at a minimum once per study period.
- Where appropriate liaise with teacher of homestay students
- Where appropriate undertake occasional visits to the homestay residence to check on the wellbeing and saftety of students

CHILD PROTECTION POLICY (SSC Child Protection Policy)

Concerns about harm to a child held by anybody employed by SSC in any capacity, including as a homestay host or service, should be reported and managed under the Child Protection Policy and Child Risk Management Strategy.

In the case of a volunteer at SSC who provides any type of volunteer service to the school, including as a homestay host or service, and in accordance with the *Child Protection Act* 1999, if the volunteer is aware or reasonably suspects that harm has been caused to a child, the volunteer

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[1] For more information about induction programs, refer to the Queensland Government publication, *Guide to providing homestay in Queensland,* available on the ISQ 2010 CD of International Education Resources.

must report the harm to the school's Principal. The types of harm reported may include sexual abuse or likely sexual abuse, emotional or psychological abuse or neglect or sexual exploitation.

According to Section 9 of the *Child Protection Act* 1999, **harm**, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.

1. It is immaterial how the harm is caused.
2. Harm can be caused by—
   a) Physical, psychological or emotional abuse or neglect; or
   b) Sexual abuse or exploitation.
3. Harm can be caused by—
   a) A single act, omission or circumstance; or
   b) A series or combination of acts, omissions or circumstances.

The Principal will then report and manage the volunteer's report under the Child Protection Policy and Child Risk Management Strategy.

This commitment is evidence of SSC's fulfilment of the requirements of section 3(1)(d) of the Regulation.

BREACHES

Breaches of this Strategy are managed as follows:

- For domestic parties – via the SSCs usual Dispute Resolution Policy and Procedures
- For international parties – via the SSC's Complaints and Appeals Policy and Procedures for International Students and their Families
- The SSC's Complaints and Appeals Policy and Procedures for International Students and their Families is based on Part D Standard 8 of the *National Code of Practice for Providers of Education and Training to Overseas Students* 2007. The Policy and Procedures include reference to the Overseas Student Ombudsman. The Policy and Procedures are outlined below:
    o Informal resolution
    o Formal resolution
    o Breaches are determined by the AHIE in the first instance;
    o Suspected breaches will be dealt with by investigation and reporting to relevant authorities where necessary and, in particular, the section on Reporting Harm or Abuse
    o Penalties for breaches will be enforced and may result in:
        o Removal of the homestay student from the homestay residence
        ▪ Pointing out to the homestay service provider or host that they are in breach of their agreement and therefore can no longer work with GGSAC or SSC
        ▪ the homestay host being reported to appropriate authorities; or
        ▪ possible criminal prosecution

o An appeals process is specified within the SSC's Complaints and Appeals Policy and Procedures for International Students and their Families

IMPLEMENTING AND REVIEWING THE CHILD RISK MANAGEMENT STRATEGY

This Strategy in its entirety and its related policies and procedures are evidence of fulfilment of the requirements of section 3(1)(f)(i) of the Regulations relating to implementation.

The introduction to this Homestay Risk Management Strategy and the "Compliance and Monitoring" section below state SSC's commitment to reviewing the Strategy annually and are evidence of fulfilment of the requirements of section 3(1)(f)(i) of the Regulations relating to review.

BLUE CARDS

All homestay service providers and homestay hosts (including parents of the school, but excluding those who are relatives of the child staying with them) must have prescribed notices (blue cards) **except** when:

- The 'employment' is arranged by the school; **and**
- The employee performs the function as a volunteer; **and**
- The employee performs the function for 10 days or less; **and**
- The employee does not perform the function on more than two occasions in the same year.

Paid employees of a homestay host must hold a blue card if they meet a 'regular contact' provision.[2]

All adults who reside with the homestay provider must hold a blue card. Any student aged 18 or over who is residing with a homestay provider who is also hosting a student aged under 18 years must also hold a blue card.

GCSAC maintains a register of:

- All blue card numbers of people in the above categories and the dates for renewal.

RISK MANAGEMENT ([SSC Child Protection Risk Management Strategy](#))

SSC has established a risk register which identifies and evaluates risks involved with the accommodation, support and general welfare of a student accommodated in homestay arrangements, and an established process for developing strategies to minimise the impact of these risks. See Appendix 1 for the homestay risk register.

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[2] Note that there is a frequency test for volunteer homestay or billeting parents which allows a person to provide homestay and/or billeting for ten or less days in a year without requiring a blue card, provided that the service is not provided on more than two occasions in one year.

[2] Regular contact provision applies to paid employees who work:

o Eight consecutive days; or
o once a week, each week, over four weeks; or
o once a fortnight, each fortnight, over eight weeks; or
o once a month, each month, over six months.

All homestay providers and homestay hosts are expected to report risk situations to SSC and GCSAC, as well as to identify risks related to activities under their supervision and to comply with all policies and strategies of the school that have been established for the safety of children.

In addition to complying with the school's risk management strategies, it is expected that homestay providers, independent of the school, will establish their own policies and procedures for risk management of students whose accommodation is sourced and managed by them. Homestay hosts must be particularly aware of recent legislative changes to risk management, such as the *Queensland Development Code Mandatory Part 3.4*.

COMMUNICATION AND SUPPORT

Professional Development

All homestay providers and hosts are required, on an annual basis, to sign a register that they have read and understood the SSC's Child Protection Policy (see Appendix 3).

In addition, SSC demonstrates its commitment to providing information and training on how to identify risks of harm and disclosures of suspicions of harm to all stakeholders by:

- Regular training for all Homestay Providers, Coordinators and Hosts;
- Enrolment package for families involved in the Scheme; and
- Orientation / induction handbook for Students.

Communication

The location/availability of the SSC's Homestay Risk Management Strategy is publicised in the following manner in order to provide access to the Strategy to all stakeholders within the Scheme:

- Homestay Parent Information, issued upon enrolment with the Scheme;
- Homestay Student Information, issued upon enrolment with the Scheme;
- Homestay Host Induction Information;
- Intranet for general staff;
- College website;

RESPONSIBILITIES

SSC is responsible for developing and implementing this Homestay Risk Management Strategy and related policies and procedures to ensure it fulfils its obligations.

All homestay hosts at SSC are responsible for acting in compliance with this Homestay Risk Management Strategy and related policies and procedures.

RELATED POLICIES AND DOCUMENTS

- Homestay Code of Conduct
- Orientation Program for Homestay Families
- Information for Homestay Families
- Homestay Rules
- RSM Host Family Insurance
- Blue Card Application Form
- Homestay Feedback

- Student Feedback
- GCSAC Policies and Procedures
- Child Protection Policy
- Student Bullying Policy
- Anti-Discrimination Policy
- Sexual Harassment Policy
- Dispute Resolution Policy
- Complaints and Appeals Policy for International Students and their Families
- ESOS Framework for CRICOS-Registered Schools ESOS Regulations

Appendix 1 – Risk Register for Homestay Arrangements

Activity	Description of risks Source of risk, likely effect of the problem	Existing control	Likelihood of risk occurring Almost certain, likely, possible, unlikely, rare	Consequences	Level of Risk Extreme, High, Moderate, Low
Student misses flight from home country	• Flight cancellation • Student is sick • Late arriving at airport	• Communication between agent, student, parent, homestay family and student airport pick-up	Possible	Minor	Moderate
Student misses connecting flight	• Flight delayed • Loses track of time	• Communication between agent, student, parent, homestay family and student airport pick-up • For younger students an unaccompanied minor assistance form is implemented	Possible	Moderate	High

Flight delayed at final destination	• No one is at the airport to meet the student	• Student airport pick-up company tracks flight arrival times to ensure they are there to meet students • Communication between homestay family and airport pick-up so they are aware that the student will arrive at their home later than scheduled • Student is given emergency contact numbers before departure	Possible	Minor	Moderate
Inadequate orientation of student	• incorrect information • understanding / misinterpretation of information • mistranslation of information • timing of orientation session • transport issues • reporting of issues • safety information • lack of ongoing Communication Strategy	• information is consistent from organisation and homestay host • written information in a number of languages • modelling behaviours by homestay host and organisation • open door policy for reporting • one on one sessions if necessary	Unlikely to Possible	Moderate to Extreme	Moderate to Extreme
Poor criterion for selection of Homestay hosts	• not addressing the element of the RMS • inadequate data gathering • lack of formal process • who conducts the interview from the organisation • not paying attention to visual evidence of accommodation • not considering what is the motivation of the homestay host	• registration of homestay host with organisation • written criterion that is communicated to homestay hosts • regular contact with homestay hosts • inspection process (interview) • exchange of information • follow up inspections of homestay facility	Rare	Extreme	High

		• orientation of prospective homestay hosts			
Student accommodated with Homestay host	• student suffering from mental health issues not appropriately managed e.g. student suffering depression may self-harm	• Homestay host trained in reporting risk of harm. Homestay manager trained in managing risks of harm to students, including networking with other support agencies.	Possible	Extreme	Extreme
Student accommodated with Homestay host	• Mishandling of student's disclosure of harm that occurred in country of origin	• Homestay host is trained in reporting risk of harm. Homestay manager trained in managing risks of harm to students, including networking with other support agencies.	Possible	Extreme	Extreme

Appendix 2

Homestay Code of Conduct

Guidelines for interacting with children and young people in Homestay Accommodation

Saint Stephen's College is committed to the safety and wellbeing of all children and young people in homestay. Homestay families will treat all students with respect and understanding at all times and listen to their concerns. To ensure students in homestay are kept safe from harm, the following Code of Conduct outlines the expected behaviour when interacting with students in homestay. The Code of Conduct applies to homestay hosts, residents of the homestay hosts' homes and visitors to the homestay home.

It is expected that the homestay host will comply with and will ensure that all occupants of or visitors to the homestay home who interact with the student will comply with this Code of Conduct at all times.

The standards of appropriate behaviour

Behaviour	Appropriate	Inappropriate
Language	• Using encouraging/positive words and a pleasant tone of voice • Open and honest communication	• Insults, criticisms or name calling • Bullying, swearing or yelling • Sexually suggestive comments/jokes • Obscene gestures
Relationships	• Being a positive role model • Building relationships based on trust	• Bullying, harassment • 'Grooming' children or young people
Physical Contact	• Allowing for personal space • Touching due to medical emergency or protecting from physical harm • Non-threatening	• Violent or aggressive behaviour including hitting, kicking, slapping or pushing • Any inappropriate or invasive physical contact
Discipline	• Will be in consultation with the College and GCSAC	• Any form of corporal punishment
Personal Appearance	• Clothing will be worn in the presence of a student • Level of personal hygiene maintained	• Nudity
Other – Homestay student will not be;	• Provided with alcohol • Made to be in the presence of drunken or intoxicated individuals • Provided with cigarettes or permitted to smoke • Permitted to drive a car, unless they are lawfully licensed to do so in Australia •	

Appendix 3

Agreement to comply with Homestay Risk Management Strategy

It is a breach of SSC Homestay Risk Management Strategy for any person to whom this strategy applies to have been found to have:

- engaged in child abuse
- done anything contrary to the policies referred to within the Strategy
- breached the Code of Conduct
- failed to follow the Scheme Policies and procedures for the protection, safety and welfare of children
- appointed or continued to employ any person in contravention of the strategy

I, <insert name>, have read the following documents:

- Homestay Risk Management Strategy
- Policy Statement of commitment to the safety and wellbeing of children and the protection of children from harm
- SSC Child Protection Policy
- SSC Child Risk Management Strategy
- Homestay Code of Conduct for interacting with children and young people in Homestay
- procedures for recruiting, selecting, training and managing homestay hosts
- policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines
- plan for managing breaches of the Homestay Risk Management Strategy
- policies and procedures for compliance with chapter 8 (this relates to Blue Cards) of the *Working with Children (Risk Management and Screening) Act* 2000
- risk management plans for high risk activities and special events, and
- strategies for communication and support.

Having read these documents, I understand SSC commitment to maintaining a safe, friendly environment for children and young people. I agree to uphold the Child Protection Policy and Code of Conduct, and to follow the guidelines and procedures outlined. I will work to contribute positively to the growth and development of the organisation and the children and young people for whom it provides services.

Signed: _____

Date: _____

Witness: _____

Date: _____