

PMSA Homestay Risk Management Strategy - 2017



A strategy for managing homestay risks in PMSA schools

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STATEMENT OF COMMITMENT

It is the goal of the PMSA and its schools to create safe environments for Homestay Students and an environment in which they can successfully pursue their academic careers and personal development.

The PMSA is committed to protecting the security, safety and wellbeing of Homestay Students under its care and will uphold the following principles under this strategy:

- 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.
- Homestay Students under the care of PMSA schools should be provided with the knowledge and information they require to feel empowered to take action in the event of abuse or neglect.
- Homestay Students are unique and valued individuals and deserve to be treated with care and respect. Respect for Homestay students is the foundation upon which all PMSA Homestay policies and procedures are developed.

PURPOSE

The purpose of this strategy is to ensure that the PMSA and its schools have appropriate policies and procedures in place to identify and minimise the risk of harm to Homestay Students where the school has taken responsibility for the accommodation, support and general welfare of the student. This Strategy also aims to provide PMSA schools with written processes to ensure Homestay Hosts, arranged by and for PMSA schools comply with the legislative requirements specified in the *Working with Children (Risk Management and Screening) Act 2000*, the *Working with Children (Risk Management and Screening) Regulation 2011*, for the care and protection of children and young people from harm and the risk of harm in Homestay arrangements.

In particular, the purpose of this Homestay Risk Management Strategy is to:

- promote the wellbeing of Homestay Students and to protect them from harm;
- assist the PMSA and its schools 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 for Homestay Hosts arranged by and for PMSA schools.

This Strategy should be read in conjunction with the *PMSA Child Protection Policy*, *PMSA Homestay Welfare and Accommodation Policy* and the School's *Homestay Code of Conduct*.

SCOPE

This Homestay Risk Management Strategy applies to all Homestay Hosts, permanent residents of and visitors to, Homestay residences and any student of a PMSA school participating in the School's Homestay program. The Strategy identifies the policies and procedures in place across the PMSA and its schools which, together, act to protect students from harm. It also identifies the strategies in place for selecting, training and monitoring Homestay families, guidelines for managing approved accommodation and welfare arrangements for homestay students, policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines, risk identification and management, communication and support about matters relating to child protection and processes for managing breaches of the *PMSA Child Protection Policy*.

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LEGISLATION

Relevant Legislation

Education (General Provisions Act) 2006 (Qld) Education
(General Provisions) Regulation 2006 (Qld) Education
(Accreditation of Non-State Schools) Act 2001 (Qld)
Education (Accreditation of Non-State Schools) Regulation 2001(Qld)
Education (Queensland College of Teachers) Act, 2005 (Qld)
Education Services for Overseas Students (ESOS) Act 2000 (Cth)
Education (Overseas Students) Act 1996 (Qld)
Public Health Act 2005 (Qld)
Working with Children (Risk Management and Screening) Act 2000
Working with Children (Risk Management and Screening) Regulation 2011

POLICIES AND PROCEDURES

PMSA Alleged Abuse of Former Students Policy

The *PMSA Alleged Abuse of Former Students Policy* and associated procedures outlines the PMSA's processes for dealing with allegations of Abuse relating to individuals who, as children, received education and/or accommodation or care within a PMSA school but who are not students of the school at the time the allegations are made, i.e. former students.

PMSA Blue Card Audit and Training Policy

The *PMSA Blue Card Audit and Training Policy* outlines the PMSA's reporting requirements for its schools in relation to the application of the employment screening process of the Department of Justice and Attorney-General to ensure the PMSA is compliant with its responsibilities under the *Working with Children (Risk Management & Screening) Act 2000* in relation to employment and volunteer, including Homestay arrangements in its schools.

PMSA Blue Card (Working with Children) Policy

The *PMSA Blue Card (Working with Children) Policy* requires that all persons who are engaged in, or provide services to, student children in PMSA schools, including Homestay Hosts (including parents of the school, but excluding those who are relatives of the child staying with them), adults, other than the designated Homestay Host who live permanently with the Homestay Host and paid employees of a Homestay Host (if they meet the regular contact provisions) must be holders of positive prescribed notices, known as 'Blue Cards', issued by the Department of Justice and Attorney-General, before commencing provision of services.

PMSA Child Protection Policy

The *PMSA Child Protection Policy* outlines the commitment of the PMSA and its schools to the welfare and well-being of the students of all its schools, including Homestay Students, where the school has taken responsibility for the accommodation, support and general welfare of the student. The Policy covers information for the handling of disclosures or suspicions of harm, including the reporting of physical, emotional and sexual abuse, as well as neglect, inappropriate behaviour and self-harm.



The Policy applies to all PMSA staff, students and volunteers at all PMSA schools, all staff, children and volunteers at all PMSA Early Learning Centres, Homestay Hosts, Homestay Students, and residents of, and visitors to Homestay residences, and is available:

- on the PMSA website;
- on the website of each school;
- in the Homestay Handbook of each school;
- in the Staff Policy Handbook of each school;
- student handbooks (summarised version)

PMSA Code of Conduct

The *PMSA Code of Conduct* outlines the standard of behaviour expected of all employees, volunteers, and contractors engaged by the PMSA including as it relates to interactions and relationships with children and young people.

PMSA Homestay Code of Conduct

The *PMSA Homestay Code of Conduct* establishes clear professional standards of conduct to be followed by all staff of PMSA schools, Homestay Hosts, arranged by and for PMSA schools, and residents of, and visitors to Homestay residences, regarding acceptable conduct, child protection obligations and interactions with students, that ensures a high standard of care and wellbeing is maintained for students in Homestay arrangements, and promotes the protection of those students from any threat or risk of harm.

The Homestay Code of Conduct is available:

- in individual school Homestay Handbooks
- on individual school websites

An example of the *Homestay Code of Conduct* can be found in Appendix 2 of this document.

PMSA Homestay Welfare and Accommodation Policy

The *PMSA Homestay Welfare and Accommodation Policy* provides written processes to ensure that PMSA schools and Homestay Hosts, arranged by and for PMSA schools, comply with legislation applying to the care and protection of children in Homestay arrangements. In particular, the purpose of this Policy is to:

- ensure that the PMSA has in place arrangements to protect the personal safety and wellbeing of Homestay Students and to protect them from harm;
- meet the requirements of Queensland's child protection framework, Migration Act and Regulations and the standards of the ESOS Act regulatory framework outlined in the National Code 2017 (Interim Code) established under the *Education Services for Overseas Students (ESOS) Act 2000*;
- provide guidelines for the selection of Homestay families to ensure suitable accommodation and a stable environment is provided to Homestay Students throughout the duration of their studies;
- provide guidelines to manage potential risk associated with activities undertaken, outside of school hours, by Homestay Students enrolled in PMSA schools.

PMSA Professional Relationships with Students Policy

The *PMSA Professional Relationships with Students Policy* outlines to all employees, volunteers including Homestay Hosts arranged by and for PMSA schools and contractors that any action that encompasses inappropriate behaviour that compromises the employees' ability to have professional relationships with students will not be tolerated by the PMSA, and may, in certain circumstances, result in the initiation of disciplinary action under the *PMSA Employee Discipline Policy and Procedure*. This policy also outlines the standard of behaviour expected of employees and what an individual can do to address the inappropriate behaviour. The focus on this policy is to promote and encourage professional relationships with students.



PMSA's School's Accreditation Manual

The *PMSA's School's Accreditation Manual* provides all PMSA schools with strategies to meet the accreditation requirements of *The Education (Accreditation of Non-State Schools) Act 2001*. The Act requires PMSA schools, as established non-government schools, to demonstrate compliance once every five (5) years with key accreditation criteria. PMSA schools must provide evidence of written processes about the appropriate conduct of staff and students, including those in homestay arrangements, that accord with legislation applying in the State about the care and protection of children, including processes for:

- the reporting by a student to a stated staff member of behaviour of another staff member that the student considers to be inappropriate; **and**
- how the information reported to that stated staff member must be dealt with by that stated staff member

PMSA Social Media Policy

The protection of children and young people (both within and outside of PMSA schools) from emotional and psychological abuse, sexual abuse or exploitation perpetrated through electronic means is taken very seriously by the PMSA. The *PMSA Social Media Policy* provides clarity on how employees of the PMSA should conduct themselves in their use of Social Media and provides guidelines for all employees on appropriate and inappropriate use of electronic devices, such as email, social networking sites, mobile video phones and SMS texting, as it relates to their interactions with students and young people.

School Blue Card Register

To ensure compliance with legislation and PMSA Policy, each PMSA school maintains a register (Blue Card Register) of the Blue Card numbers of all Homestay Hosts (including parents of the school, but excluding those who are relatives of the child staying with them), adults, other than the designated Homestay Host who live permanently with the Homestay Host and paid employees of a Homestay Host, and the dates of expiry.

School Homestay Handbook

The *Homestay Handbook* forms part of a comprehensive Homestay information pack, provided to all Homestay Hosts arranged by and for PMSA schools, to ensure their visiting students have a fulfilling Homestay experience. The Homestay Handbook sets out clear criteria, for the Homestay Host, with regard to how it makes decisions about the suitability of a Homestay situation and covers minimum requirements with regard to:

- Working With Children "Blue Card" requirements
- Facilities and infrastructure
- Hygiene
- Cultural awareness
- School and Homestay rules
- Services provided (e.g. meals, laundry)

SELECTION AND SCREENING

Selection

The PMSA and its schools recognise that risk management for children in Homestay arrangements begins with the selection of the right people to provide appropriate accommodation, support and general welfare to Homestay Students, and continues by having consistent procedures in place for all stakeholders to follow, with adequate training and support from the school, to ensure that, they comply with these procedures.

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In choosing a Homestay Host all PMSA schools are required to comply with any relevant legislation and be satisfied 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 school and adjusting to living in a new environment. To be considered for selection in a PMSA school's Homestay programme, all prospective Homestay Hosts must agree to uphold the provisions of the PMSA and school's Child Protection Policy and Homestay Code of Conduct, and follow the guidelines and procedures outlined.

Each PMSA school has implemented a general policy to select Homestay Hosts known to them, such as parents of the school or members of the school community and those families already established as Homestay Hosts for other reputable organisations within the wider local area.

In selecting a Homestay Host, each PMSA school must ensure (as a minimum) that:

- Host families are carefully selected from within the school community (where possible).
- All Host families have undergone a police check as required by Queensland law.
- Host families are interviewed and assessed by a trained School-based Homestay Coordinator.
- Host families receive a comprehensive Homestay information pack, including a Homestay Handbook, to ensure their visiting student has a fulfilling Homestay experience.
- Host families can provide visiting students with suitable accommodation and a stable environment for the duration of their stay.
- Host families are aware of, and can effectively manage potential risks associated with activities undertaken by visiting students.
- Host families agree to provide assistance to access appropriate transport to and from school and related school activities.
- Host families agree to the school's Homestay Code of Conduct and the PMSA's Child Protection Policy

Each school also has an established Homestay information pack, which in addition to the Homestay Handbook, includes:

- an Introductory Letter to Homestay Host
- an Application to provide Homestay Accommodation
- an Agreement for Homestay Accommodation
- instructions on how to apply for a Blue Card
- the PMSA Child Protection Policy
- the PMSA Homestay Welfare and Accommodation Policy
- Homestay Code of Conduct

The *PMSA Homestay Welfare and Accommodation Policy* provides guidelines to assist schools in the selection, training and monitoring of Homestay Hosts.

Screening

As part of the Homestay application and selection process for PMSA schools, all Homestay Hosts (including parents of the school, but excluding those who are relatives of the child staying with them) must have positive prescribed notices (Blue Cards) issued by the Department of Justice and Attorney-General under the *Working with Children (Risk Management and Screening) Act 2000* **except** when an exemption applies under the Act.



INDUCTION

The PMSA and its schools value the work of Homestay Hosts and recognise their responsibility to offer support and assistance to ensure that Homestay arrangements work well for all concerned.

Once Homestay Hosts have been successfully selected and screened, all new Homestay Hosts are required to attend a compulsory induction session, conducted by the school's Homestay Coordinator. These induction programs are designed to make Homestay Hosts aware (as a minimum) of the following:

- The PMSA and school's commitment to providing environments which are safe, caring and supportive to children and young people.
- The PMSA and school's policies and procedures relating to the protection from harm of students in Homestay arrangements.
- Procedures to follow when harm is disclosed or suspected
- Their rights and responsibilities
- What is expected of them
- What they can and can't do – the boundaries of their roles
- The roles of the key people in the school and/or PMSA and to whom the Homestay Host should report or go for help
- What to expect if there is an allegation of harm made against them or to them
- Reporting and grievance procedures

These induction sessions are run periodically throughout each year and are designed to:

- Enhance the skills and knowledge of Homestay Hosts, enabling them to contribute positively to the growth and development of the students in their care
- Reduce exposure to risks
- Support friendly environments for children and young people

All Homestay Hosts, and prospective Hosts, are also provided with a copy of the School's Homestay Handbook as part of the induction process.

MONITORING

Monitoring of the service provided by all Homestay Hosts, arranged by and for PMSA schools, is conducted by each School, through the Homestay Coordinator and includes (but is not limited to):

- Conducting periodic surveys of Homestay Students, which includes an evaluation of their accommodation and welfare arrangements and taking action as required
- Regular contact with the Homestay Host by phone and/or email to discuss and review the arrangement
- Conducting informal meetings with Homestay Students and pastoral care meetings to monitor adjustment; at a minimum once per study period
- Where appropriate liaise with teachers of Homestay Students
- Where appropriate undertake occasional visits to the Homestay Residence to check on the wellbeing and safety of students
- School's Complaints Register



- Self-assessment by Homestay Hosts
- Exit statements by Homestay Students and Hosts

Homestay Hosts are also encouraged to contact the school's Homestay Coordinator immediately if they have any concerns.

At each PMSA school, internal audits of their Blue Card Registers are conducted annually, and an external audit is conducted every four years under the *PMSA Blue Card Audit and Training Policy* as part of the PMSA's Risk Management and Assurance Program. All Homestay Hosts are required, on an annual basis, to sign a register that they have read and understood the PMSA Child Protection Policy.

PROFESSIONAL DEVELOPMENT

The PMSA and its schools believe that ongoing improvement grows from continuous learning, and as such professional development opportunities in relation to child protection are provided on a regular basis by each school, to School Homestay Coordinators.

In addition Homestay Hosts are provided with regular updates regarding legal compliance with respect to child safety and risk management, to address any issues regarding Homestay arrangements.

PLANNING HIGH RISK ACTIVITIES AND SPECIAL EVENTS

All PMSA schools have an established 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. The types of risks associated with Homestay arrangements include risks relating to the student's pre departure; risks to which the student may be exposed post arrival and risks relating to the student's departure from Australia. An example of the Homestay Risk Register held by each PMSA school can be found in Appendix 1.

Potential risks to Homestay Students are also included as part of the standard risk management processes applied by all schools when developing risk management plans for high risk and special events in which students, including Homestay Students, may participate. The types of activities and events that would be included under this category include, but are not limited to, sporting carnivals, school excursions and camps.

All Homestay Hosts are also expected to identify risks relating to activities under their supervision and to ensure child protection issues are addressed as part of the standard risk management processes in the Homestay arrangement. This includes risks associated with levels of supervision of the student during the Homestay, including outside of school hours, and risks associated with the student's general welfare, including social activities and travel.

Each PMSA school has a Risk Management Committee with the role of identifying risks to students of the school, including those who are accommodated in Homestay arrangements and all Homestay Hosts are expected to report risk situations to the school's Committee, via the School Homestay Coordinator or Principal.

The risk management approach implemented by all PMSA schools is consistent with the framework set out in the *PMSA Enterprise Risk Management Framework*.



CRITICAL INCIDENTS

A critical incident involving a Homestay Student will be managed by the school in accordance with the *PMSA Critical Incident Management Policy* and the *Critical Incident Management Plan* of the relevant school.

EXTERNAL CONTRACTORS

All paid employees of a Homestay Host (if they meet the regular contact provisions) are required to be holders of Blue Cards, issued by the Department of Justice and Attorney-General, before commencing provision of services. These employees are also required to agree to the School's Homestay Code of Conduct and the PMSA Child Protection Policy.

MARKETING AND ADVERTISING

All PMSA schools have in place a policy for the use of key messages and images featuring children, and will ensure, in respect of photographs of students being accommodated in Homestay arrangements, that:

- The permission of the parent or guardian of the child has been obtained, including specification by the parent and child as to how the image will be used; **and**
- When obtaining consent to use an image the child's confidentiality is maintained and the child is not put at risk or the child's best interest compromised.

COMMUNICATION AND SUPPORT STRATEGIES

Homestay Students and Parents

Policies and procedures have been developed for the education of all students in PMSA schools regarding the prevention of harm, and the process for disclosure of, or the suspicion of harm, including self-harm.

The PMSA Child Protection Policy is made available to Homestay Students and parents via individual school websites, student diaries, Homestay Handbooks and the PMSA website. The Policy is also displayed on at least one noticeboard within each school and the attention of parents and students drawn to the Policy at least twice a year via school newsletters. A copy of the PMSA Child Protection Policy is also available from Administration staff at each school. This Homestay Risk Management Strategy is also available via the PMSA and individual school websites.

A "*Student Guide for Protection from Abuse or Harm*" is included in all student handbooks and students are informed at assembly and regular classroom meetings about how to protect themselves, and to whom to report if they are concerned about their safety.

Homestay Hosts

To ensure that all Homestay Hosts, adults who permanently live with the Homestay Host, visitors to the Homestay residence and paid employees of the Homestay Host, understand what is expected of them with regard to providing a safe and secure environment for students in Homestay arrangements, this Homestay Risk Management Strategy is directed, by each school, to the attention of all Homestay Hosts through the Homestay Handbook, and in particular, during the induction process for all new Homestay Hosts. The Homestay Risk Management Strategy is also publicly available via the PMSA and individual school websites.



RESPONDING TO DISCLOSURES AND SUSPICIONS OF HARM

A Homestay Host arranged by or for a PMSA school must be aware of and comply with the *PMSA Child Protection Policy* with regard to procedures for reporting of harm, such that if a Homestay Host becomes aware or suspects that harm has been caused by anyone to a student of the school who was under 18 at the time, the Homestay Host should report it to the Principal either directly or via the Homestay Coordinator, and keep a written record of the actions.

The PMSA Child Protection Policy outlines the procedures for reporting and responding to disclosures of harm, including self-harm, regardless of whether:

- The harm to the child or young person has been caused by a person from within or outside a PMSA school, or
- The child or young person disclosing the harm is from within or outside a PMSA school.

Each PMSA school keeps a confidential register in the Principal's office of all incidents related to sexual abuse, harm or inappropriate behaviour. Where an incident is reported, full details, including the steps taken to resolve the incident, are entered in the register.

Each school also has a comprehensive complaints handling procedure, for access by staff, parents and students, in cases where an issue is not resolved to their satisfaction.

MANAGING BREACHES OF PMSA CHILD PROTECTION POLICIES

Each PMSA school reviews all allegations of breaches of any of its policies, and will take steps to minimise the risk of any further breaches. Non-compliance with the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* will result in penalties imposed under the Act.

The *PMSA Child Protection Policy* addresses consequences that may result when a Homestay Host, adults permanently residing in or visiting the Homestay residence and/or employees of a Homestay Host, act in contravention of their obligations under the Policy. Suspected breaches are dealt with by investigation and reporting to relevant authorities where necessary.

It is a requirement that any breach of the school's *Homestay Code of Conduct* must be reported to the School Homestay Coordinator as soon as reasonably practicable and, in the case of any incident involving harm of a physical or sexual nature to a Homestay Student, to the Principal, in accordance with the *PMSA Child Protection Policy*.

Homestay Hosts, arranged by or for PMSA schools are made aware of, and must accept that any breach of the *PMSA Child Protection Policy* and/or school's *Homestay Code of Conduct*, including any failure to report a breach of the Code of Conduct may result in:

- removal of the Homestay Student from the Homestay Residence and the control of the Homestay Host;
- termination of the Homestay Host's participation in the Homestay Program;
- the Homestay Host being reported to appropriate authorities; or
- possible criminal prosecution.

GOVERNANCE

The PMSA Education and Pastoral Care Committee has responsibility for the oversight relating to all child protection matters, including those which relate to students in Homestay arrangements.



Risk Management Reporting

Compliance with Child Protection legislation and PMSA Child Protection policies and procedures requires any identified risks or incidences pertaining to child protection in individual schools and breaches of the *PMSA Child Protection Policy* and/or *PMSA Homestay Welfare and Accommodation Policy*, to be included in a Risk Management report provided by each PMSA School Council on a quarterly and annual basis respectively.

Incidents, risks or breaches of major significance, including criminal acts, are reported directly to the PMSA Councillors on a more urgent basis as they are identified. Consultation by the individual School Council Chairman and Principal with the PMSA Chairman to determine the trigger for such reporting is recommended.

Risk Management Review

The PMSA and its schools ensure that this Homestay Risk Management Strategy is implemented, reviewed annually and updated as necessary to ensure compliance with the *Working with Children (Risk Management) Act 2000*, and any other legislation which may, in the future be enacted in relation to child protection.

RELATED POLICIES AND DOCUMENTS

- PMSA Alleged Abuse of Former Students Policy
- PMSA Blue Card Audit and Training Policy
- PMSA Blue Card (Working with Children) Policy
- PMSA Child Protection Policy
- PMSA Critical Incident Management Policy
- PMSA Code of Conduct
- PMSA EEO, Anti-Discrimination, Sexual Harassment & Bullying Policy
- PMSA Enterprise Risk Management Framework
- PMSA Homestay Code of Conduct
- PMSA Homestay Welfare and Accommodation Policy
- PMSA Professional Relationships with Students Policy
- PMSA Schools' Accreditation Manual
- PMSA Social Media Policy
- Student Guide for Protection from Abuse or Harm



Appendix 1 Risk Register for Homestay Arrangements

Risk Register for Homestay Arrangements

Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Pre-arrival						
Homestay Student misses the flight from the home country	Possible	Minor	Moderate	Email and phone communication between Homestay Student, parents, travel agent, school and Homestay family	Parents contact School Homestay Coordinator Homestay Coordinator contacts travel agent to organise new flight	Homestay Student and Parents
Homestay Student misses the flight at the stopover destination	Possible	Moderate	High	Phone communication between Homestay Student, the school Homestay Coordinator and Homestay family	Homestay Coordinator contacts school homestay coordinator and new arrival details are provided.	Homestay Student
Flight delayed at final destination	Possible	Minor	Moderate	Phone communication between the School Homestay Coordinator and Homestay Family	Homestay Family contacts school Homestay Coordinator	Homestay Family
Homestay Student kidnapped during the journey	Unlikely	Catastrophic	High		Homestay Coordinator contacts police or relevant authorities, parents, school	PMSA School
Homestay Student ill/hurt during the journey	Possible	Major	High	Phone communication between Homestay Student, School Homestay Coordinator, School and emergency services (if applicable)	Student seeks medical attention. Contact Homestay family, Homestay Coordinator and parents	Airport Reception Service

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PMSA Child Protection
Homestay Risk Management Strategy 2017

Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Homestay Student not met at the airport	Possible	Major	High	Visible school signs at the airport; Emergency contact numbers provided to student before departure	Student contacts school Homestay Coordinator. School to arrange alternative pick up	School Homestay Coordinator
Homestay Student fails to clear customs	Possible	Major	High	Pre-departure information to Homestay Student	Airport reception service to contact School Homestay Coordinator - contact to be made with the Homestay Student and appropriate actions taken so that Homestay Student will enter the country or arrangements made to return home	Airport Reception Service
Post arrival						
Mismatch between student and Homestay family	Possible	Moderate	High	Homestay recruitment, induction and monitoring process. Information provided to Homestay Students (e.g. Pre-departure Orientation Program). Homestay Coordinator Position Description.	School's discretion. If after the decision, the Homestay Student is still unhappy the student must be given access to the school's complaints and grievance procedures.	PMSA School
Student abuses Homestay Host's children	Possible	Catastrophic	Extreme	Homestay Code of Conduct, Orientation	Move student to another Homestay Provider. Initiate investigation, School Homestay Coordinator contacts Homestay Student's parents using translating services if required.	PMSA School

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Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Physical abuse of Homestay Student by Homestay Host	Possible	Catastrophic	Extreme	Blue Card register. Regular communications between student, school and Homestay. Informal sharing of information across networks of inappropriate families. Regular monitoring of homestay by the Homestay Coordinator.	Immediately move the student to another Homestay Provider. School to arrange medical treatment and counselling. School to contact police, student's family and PMSA.	PMSA School
Physical abuse of Homestay Student by person other than Homestay Provider	Possible	Catastrophic	Extreme	Regular communications between student, school and Homestay Provider.	School to arrange medical treatment and counselling. School to contact police, Homestay Student's family and PMSA.	PMSA School
Psychological abuse of Homestay Student by Homestay Host	Possible	Catastrophic	Extreme	Blue Card register. Regular communications between Homestay Student, school and Homestay Provider. Informal sharing of information across networks of inappropriate families.	Move Homestay Student to another Homestay Provider. Initiate investigation. School contacts Homestay Student's parents (using translating services if required) and PMSA.	PMSA School
Psychological abuse of Homestay Student by person other than Homestay Host	Possible	Catastrophic	Extreme	Regular communications between Homestay Student, School and Homestay Host.	School Homestay Coordinator to investigate, with possible movement of Homestay Student. School contacts Homestay Student's parents (using translating services if required) and PMSA.	PMSA School

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Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Homestay Student disappears during the stay in Queensland	Unlikely	Catastrophic	High	Orientation programs; Emergency contact card; Absence monitoring	School contact police, parents, DIAC	School
Accident at school - Homestay Student injured	Likely	Major	High	School procedures	School prepares incident report and notifies parents	School
Accident outside of the School - Homestay Student injured	Possible	Major	High	School procedures	Homestay Student/Homestay Host seeks help and medical attention.	Homestay Host
Homestay Student extorted during the stay in Queensland	Possible	Major	High	Awareness raising campaign	School contacts police, parents	School
Homestay Student accesses inappropriate Internet websites	Possible	Moderate	High	Homestay Student Code of Conduct, Orientation program	International/Homestay Coordinator discuss issue with the student	Homestay family, school
Homestay Student watches pornographic movies	Possible	Moderate	High	Student Code of Conduct, Orientation program	Homestay Coordinator discuss issue with the Homestay Student	Homestay host, school
Homestay Student self-harm	Unlikely	Catastrophic	High	Monitoring by school staff. Training and professional development for staff	Medical treatment and counselling, School contact parents and PMSA.	Homestay Host, school
Culture shock	Likely	Moderate	High	Monitoring by school Homestay Coordinator, School orientation program and pastoral care program	Homestay Coordinator arranges discussions between Homestay Student and School guidance officer and Homestay Host	Homestay host and school
Homestay Student becomes pregnant	Unlikely	Major	Moderate	School orientation, Human Relationship Education orientation; School Nurse intervention	School contacts parents with a view to student returning home.	School

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Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Unsupervised travel during holidays	Possible	Moderate	High	School travel policy must require Principal to approve all travel plans, school not liable for travel done without school approval. Also encourage School arranged Holiday Programs as safe alternative	International/Homestay Coordinator discuss issue with the Homestay Student, contacts Principal if breach, issues warning letter, Principals to contact parents	School
Travel during school term	Unlikely	Major	Moderate	DIAC 80% attendance rules in place, School orientation information sessions advise of travel policy	School to contact parents	School
Homestay Student does not show up at school	Possible	Minor	Moderate	DIAC 80% attendance requirement, school truancy policy for domestic students applies	School to contact family and police if necessary	School
Homestay Student lacks confidence	Possible	Minor	Moderate	Orientation sessions, appropriate school placement and support mechanisms in School, Chaplains and/or Guidance Officers in School to assist	School Chaplains and/or Guidance Officer to assist, depending on cause alternative schooling and or accommodation placement could be arranged if appropriate.	School
Homestay Student arrives home late at night	Possible	Minor	Moderate	Breach of Homestay rules as outlined in the Homestay Code of Conduct. Breach of visa rules and Homestay Student can be sent home	If consistent ascertain why. Counselling at school level. Negotiate with Homestay Host if problem originating there.	School

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PMSA Child Protection
Homestay Risk Management Strategy 2017

Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Homestay Student is involved with people influencing them to make bad decisions	Possible	Major	High	School based orientation to address issues relating to inappropriate influences.	School to counsel, discipline if necessary and implement behaviour contracts	School
Alcohol abuse by Homestay Student	Possible	Major	High	Against the law therefore against Homestay Code of Conduct. School orientation to address these issues	Inform of possible visa cancellation due to breach of Australian law, Homestay Coordinator to counsel. Possible return home.	School
Drug abuse by Homestay Student	Possible	Major	High	Against the law therefore against Homestay Code of Conduct. School orientation to address these issues	Inform of possible visa cancellation due to breach of Australian law, Homestay Coordinator to counsel. Refer to police.	School
Homestay Host abuse alcohol/drugs	Possible	Major	High	Homestay Host interviews and blue card requirements.	School to talk to Homestay Host, shift student and perform investigation.	School
Pandemic (e.g. Bird/Swine Flu)	Unlikely	Catastrophic	High	Hygiene awareness, evacuation plans	No more COE's issued after level 4. Parents contacted and Homestay Student to be sent home.	School
Homestay Student bringing in contraband	Possible	Major	High	School Pre-departure Orientation Program, School orientation	Involvement of Australian Quarantine Information Service (AQIS) and confiscation of banned goods.	School, AQIS
Money laundering	Unlikely	Major	High	Customs regulations, Homestay Code of Conduct	Inform police, Homestay Student to be sent home, COE cancelled	School
Homestay Student drives without a licence	Possible	Major	High	Breach of Australian law, School orientation to address issues around driving in Australia	Homestay Coordinator to appropriately counsel Homestay Student, possible expulsion from the program due to breach of Australian Law and therefore visa requirements	School

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PMSA Child Protection
Homestay Risk Management Strategy 2017

Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Homestay Student visits night club underage	Possible	Major	High	Breach of Australian law, school orientation to address issues	Homestay Coordinator to appropriately counsel Homestay Student, possible cancellation from the program due to breach of Australian Law and therefore visa requirements	School
Homestay Student rides bicycle without helmet	Possible	Minor	Moderate	Breach of law, school orientation to address	Homestay Coordinator to appropriately counsel Homestay Student, possible expulsion from the program due to breach of Australian Law and therefore visa requirements	School
Homestay Student being bullied	Possible	Moderate	High	Schools policy on bullying	Homestay Coordinator to counsel Homestay Student and report incident to the school	School
Homestay Student sexually active	Possible	Moderate	High	School orientation including relationships education, involvement of School Nurse	Homestay Coordinator to counsel Homestay Student, ensure not in breach of Australian law (below age of consent)	School
Homestay Student participating in unsafe events	Possible	Moderate	High	Orientation to address issues of safety, Homestay Host not to include Homestay Student in unsafe events	Homestay Coordinator to counsel Homestay Student, Homestay Code of Conduct to address issues around safety	School
Homestay Student working without appropriate visa rights	Possible	Moderate	High	Australian Law and Homestay Code of Conduct	Counsel and warnings, possible cancellation of enrolment if academic/attendance affected.	School

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PMSA Child Protection
Homestay Risk Management Strategy 2017

Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Work affecting a student's well-being	Possible	Moderate	High	Work/life balance information pre-departure and during orientation, Homestay Code of Conduct outlining obligations to academic improvement and possible expulsion from program for non-achievement	Homestay Host/School teachers/Homestay Coordinator to counsel Homestay Student, encouragement to seek balance, cut back hours until academic results improve	School
Homestay Student changes homestay without telling school	Likely	Moderate	High	Breach of visa conditions, School orientation	Original Homestay Provider to contact School, appropriate response to be determined by School	Original Homestay Provider/School
Homestay Student staying with family member who has actually gone home	Possible	Major	High	Breach of visa conditions	Homestay Coordinator to contact parents, DIAC, Homestay Student to be moved into appropriate accommodation immediately or sent home	School
Homestay Student bringing into the country more than \$10,000	Possible	Major	High	Australian Law, pre-departure information	Homestay Coordinator to counsel Homestay Student, report to appropriate authority and measures to ensure safety and security adopted	School
Homestay Student moving out of homestay without permission	Possible	Major	High	Breach of visa conditions School orientation	Original Homestay Host to contact School, appropriate response to be determined by School	Original Homestay Host
Homestay Student using unsafe transport methods	Possible	Minor	Moderate	School orientation	Homestay Coordinator to counsel Homestay Student, seek alternatives to unsafe travel	School

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Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Departure						
Airport pick up does not arrive	Possible	Moderate	High	Contracted to reputable company with many drivers in case one doesn't show up.	Homestay Host to contact School/Airport pickup service and arrange alternatives	Homestay family, school and Airport Pickup company
Homestay Student misses the flight from Queensland	Unlikely	Moderate	Moderate	Early arrival plans at airport, Homestay Host to assist with early preparations	Travel agent/airline and parents contacted immediately, alternative arrangements made	Homestay Host/Airport drop-off company
Homestay Student does not arrive at the destination	Unlikely	Moderate	Moderate	Pre-departure arrangements checked by Homestay Host.	Parents to call School, Airline to be contacted	School

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Appendix 2 Code of Conduct for Homestay Arrangements

Homestay Code of Conduct Guidelines for interacting with children and young people in Homestay Accommodation

BACKGROUND

While it is not the intention of the PMSA to stifle the warm and friendly relationship between families and Homestay Students, Homestay Hosts and families should be aware that problems in this area do arise from time to time and they should exercise all appropriate care and consideration towards the Homestay Students in their home. The best way of ensuring appropriate behaviour is to abide by relevant legislation and PMSA and school policies, comply with the points agreed to in the Homestay Agreement and exercise common sense and caution with regard to the homestay student in their care. In exercising “common sense and caution” Homestay Hosts should take into account the significant cultural differences between their own ideas of appropriate behaviour and those of their students.

PURPOSE

This Code of Conduct outlines the standards of behaviour expected of the Homestay Host, their families and all visitors who interact with the Homestay Student in the Homestay Residence. These standards are consistent with the values and principles of the School's Homestay Program.

WHO MUST COMPLY WITH THIS CODE OF CONDUCT

This Code of Conduct applies to

- Homestay Hosts
- Residents of Homestay Hosts' homes
- Visitors to Homestay Residences
- Employees of Homestay Hosts (if they meet a “regular contact” provision)

As part of the Homestay Agreement the Homestay Host acknowledges that this Code of Conduct applies at all times when any of the people referred to above interact with the Homestay Student or are in the presence of the Homestay Student. It is expected that the Homestay Host will comply with and will ensure that all occupants of or visitors to the Homestay Residence who interact with the Homestay Student comply with this Code of Conduct at all times.

DEFINITIONS

The PMSA Child Protection Policy provides the following definitions for Abuse and Sexual Abuse: “Abuse” means the activity or deliberate or careless inactivity which causes significant harm, that is to say, any detrimental effect of a significant nature on a person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. The harm can be caused by:

- Physical, psychological or emotional Abuse or neglect
- Sexual Abuse or exploitation



“Sexual Abuse” in relation to a relevant person, includes sexual behaviour involving the relevant person and another person in the following circumstances

- (a) The other person bribes, coerces, exploits, threatens or is violent toward the relevant person;
- (b) The relevant person has less power than the other person;
- (c) There is a significant disparity between the relevant person and the other person in intellectual capacity or maturity.

PRINCIPLES

As part of the Homestay Agreement, Homestay Hosts will uphold the following principles under this Code of Conduct:

- 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.
- Homestay Students should be provided with the knowledge and information they require to feel empowered to take action in the event of abuse or neglect.
- Homestay Students are unique and valued individuals and deserve to be treated with care and respect.
- Homestay Hosts are committed to promoting the wellbeing of Homestay Students under their protection by protecting their security, safety and wellbeing at all times.

RELATED DOCUMENTS

The Homestay Host acknowledges and accepts that in addition to the standards set out in this Code of Conduct the Homestay Host is also required to read and comply with any obligations or standards contained in the following relevant documents:

- PMSA Alleged Abuse of Former Students Policy
- PMSA Child Protection Policy
- PMSA Code of Conduct
- PMSA Homestay Welfare and Accommodation Policy
- PMSA Blue Card (Working with Children) Policy

STANDARDS OF CONDUCT REQUIRED

The Homestay Host will observe, and will ensure that all persons to whom this Code of Conduct applies observe, the following standards of conduct towards the Homestay Student:

Language

- Language used in the presence of the Homestay Student will be appropriate, inoffensive and culturally sensitive.

Physical Contact

- The Homestay Student will be given full respect of his/her personal space and will not be subjected to any inappropriate or invasive physical contact.
- Aggressive behaviour initiated by a Homestay Student will not be reciprocated beyond that which is reasonably required to restrain the Homestay Student or protect another person from the Homestay Student.

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Discipline

- Discipline of the Homestay Student will be decided in liaison with the School Homestay Coordinator and if necessary the parents of the Homestay Student and the Principal.
- In matters of a serious nature, action by the Homestay Host will be postponed until sufficient liaison with the Homestay Coordinator and the Principal has been carried out and an appropriate course of action has been decided.
- The Homestay Student will not be subjected to any form of corporal punishment.

Personal Appearance

- Appropriate levels of personal hygiene will be maintained and appropriate clothing will be worn in the presence of the Homestay Student.

General Behaviour

All behaviour must be appropriate to and respectful of the Homestay Student and his/her religious, ethnic or cultural background. In addition, the Homestay Student will not be:

- subjected to aggressive, violent or intimidating behaviour or bullying;
- be subjected to behavior which threatens or vilifies the Student;
- subjected to jokes, suggestive comments or offensive gestures related to the Homestay Students race, colour, ethnic origin, disability or gender;
- subjected to the distribution or display of material (including through e-mail, text messaging or social media) which may be offensive
- made to be in the presence of drunken or intoxicated individuals;
- provided with alcohol;
- provided with cigarettes or permitted to smoke;
- permitted to drive a car, unless they are lawfully licensed to do so in Australia;
- subjected to persistent questions about the Student's private life;

Sexual Harassment

Homestay Hosts are reminded that, for the purposes of Queensland and Commonwealth laws prohibiting sexual harassment in relation to accommodation, behaviour towards the Homestay Student is judged by the student's reasonable perception and interpretation of that behaviour, and not by the intention of the person demonstrating the behaviour.

Examples of behaviour that may be deemed to constitute sexual harassment includes any:

- unwanted, deliberate and/or inappropriate physical contact;
- suggestive remarks or action of a sexual nature;
- demands for sexual favours, either directly or by implication
- behaviour that may be deemed flirtatious or to be expressing romantic feelings;
- sexual exhibition of any kind;
- obscene gestures, language, jokes containing sexual references or deliberate exposure to the sexual behaviour of others in any form;
- conduct that would constitute a criminal offence of a sexual nature; or
- any other behaviour that might reasonably be interpreted as being designed or intended to arouse or gratify sexual desires.
- distribution or display of material (including through e-mail, text messaging or social media) which may be offensive, such as sexually explicit posters or pictures

Any advances of a sexual nature from a Homestay Student must be rejected and will be reported to the Homestay Coordinator immediately.



BREACHES OF THE CODE OF CONDUCT

Any breach of this Code of Conduct must be reported to the Homestay Coordinator as soon as reasonably practicable and, in the case of any incident involving Harm of a physical or sexual nature to the Homestay Student, to the Principal in accordance with the PMSA Child Protection Policy.

The Homestay Host acknowledges and accepts that any breach of this Code of Conduct, including any failure to report a breach of this Code of Conduct may result in:

- removal of the Homestay Student from the Homestay Residence and the termination of the Homestay Host's participation in the Homestay Program;
- the Homestay Host being reported to appropriate authorities; or
- possible criminal prosecution.

CONTACTS

The Homestay Host can obtain further information in relation to compliance with this Code of Conduct by contacting the School Homestay Coordinator.