



Homestay
Risk Management Strategy
2019



PMSA



1. Preface

Sections 171 and 172 of the *Working with Children (Risk Management and Screening) Act 2000 (Qld) (Act)* require persons employing employees, volunteers, board members and managers in regulated employment and persons conducting regulated businesses to develop and implement a written risk management strategy about the regulated employment or regulated business that implements employment practices and procedures to promote the wellbeing of a child affected by the regulated employment or regulated business.

The risk management strategy must include the matters prescribed under section 3 of the *Working with Children (Risk Management and Screening) Regulation 2011 (Qld)*.

PMSA schools engage people who conduct a regulated business of 'child accommodation services including homestays' and employ employees and volunteers in regulated employment. This strategy meets the legislated requirements.

2. Scope

This strategy applies to all PMSA facility's homestay hosts and their contractors and visitors.

3. Related legislation

- 3.1 Child Protection Act (1999) (Qld)
- 3.2 Child Protection Regulation 2011 (Qld)
- 3.3 Education and Care Services National Law (Queensland) Act 2011(Qld)
- 3.4 Education and Care Services National Law (Queensland) Regulation 2011
- 3.5 Education and Care Services Act 2013 (Qld)
- 3.6 Education and Care Services Regulation 2013
- 3.7 Education (General Provisions Act) 2006 (Qld)
- 3.8 Education (General Provisions) Regulation 2017 (Qld)
- 3.9 Education (Accreditation of Non-State Schools) Act 2017 (Qld)
- 3.10 Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)
- 3.11 Education (Queensland College of Teachers) Act 2005 (Qld)
- 3.12 Education (Queensland College of Teachers) Regulation 2016 (Qld)
- 3.13 Education Services for Overseas Students (ESOS) Act 2000 (Cth)
- 3.14 Education (Overseas Students) Act 2018 (Qld)
- 3.15 Education (Overseas Students) Regulation 2018(Qld)
- 3.16 Working with Children (Risk Management and Screening) Act 2000 (Qld)
- 3.17 Working with Children (Risk Management and Screening) Regulation 2020 (Qld)

4. Our commitment to child protection

- 4.1 The PMSA commitment to child protection is immersed in our vision:
'To build communities based on Christian foundations, by providing teaching and learning environments of excellence, permeated by Christian faith and actions'
- 4.2 The PMSA is committed to the safety and wellbeing of children and the protection of children from harm. We see this as an outward expression and evidence of our Christian faith.

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- 4.3 Every person who shares in the work of the PMSA communities – including employees, volunteers, board members, managers and visitors as well as homestay hosts – shares in the responsibility to care for and protect all children from threats or perceived threats of harm.

5. Expectations of commitment and behavior of personnel

- 5.1 In performing any role in any PMSA facility, our people are expected to work in a manner consistent with the PMSA Christian ethos and values. The PMSA Code of Conduct outlines the standards of behaviour expected of all personnel in the PMSA Facilities. We expect that our personnel will be caring, compassionate individuals who take an interest in children and who set appropriate boundaries within their relationships with children.
- 5.2 Our employees, volunteers, homestay hosts, board members and managers must ensure that their interactions with children are appropriate and professional at all times. They must actively strive to prevent harm to children and support any children in a PMSA facility who have been harmed.
- 5.3 Our personnel will treat all children respectfully and within the child protection laws of Australia (free from any form of abuse). Specific protocols which relate to situations involving children include:
- (1) Personnel must not have a romantic or sexual relationship with a child.
 - (2) Personnel should avoid situations where they are alone in an enclosed space with a child.
- 5.4 When physical contact with a child is a necessary part of the homestay experience, employees and volunteers must ensure that the contact is appropriate and acceptable. The employee or volunteer must always advise the child of what they intend doing and seek their consent.
- 5.5 Employees, volunteers, board members and managers should not transport children in their own vehicles unless they have specific permission from the child or student's parent/carer, their supervisor and/or the Principal or nominated supervisor prior to the journey, where there is no feasible option available to provide alternative transportation or in the event of an emergency situation.
- 5.6 Employees, volunteers, board members and managers must not develop a relationship with any child that is, or that can be interpreted as being, a personal rather than a professional relationship.
- 5.7 Employees, volunteers, board members and managers must not use electronic devices, such as email, social networking sites, mobile video, phones or SMS texting to distribute sexually explicit material to a child or for solicitation or harassment.
- 5.8 All homestay interactions with children by email or other electronic means must be directly related to the educational context and must be professional always.
- 5.9 Employees, volunteers, board members and managers must not invite children to join their personal electronic social networking site/s or accept student invitations to join their social networking site/s.
- 5.10 The PMSA has a Code of Conduct for homestay hosts which outlines the standards of behaviour expected of homestay hosts, their families and all visitors who interact with homestay students in homestay residences. These standards are consistent with the values and principles of our homestay program.

This commitment is evidence of the PMSA fulfilment of the requirements of section 3(1)(b) of the Regulation.

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6. Policies and procedures

6.1 The PMSA is committed to providing a safe environment for all children in our care by developing and implementing policies and procedures which ensure that:

- (1) all Personnel are screened and trained in the requirements and processes of child protection and professional behaviour; and
- (2) students and parents/carers are provided with information and education in child protection.

6.2 PMSA Alleged Abuse of Former Students Policy

The PMSA Alleged Abuse of Former Students Policy and associated procedures outlines the PMSA 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. they are former students.

6.3 PMSA Blue Card (Working with Children) Policy outlines the PMSA's reporting requirements for schools.

The PMSA Blue Card (Working with Children) Policy requires that all persons who are engaged in, or provide services to, children in PMSA Facilities, except those who fall into the exempted categories, must have met the Blue Card screening requirements, as required by the Act before commencing service.

The PMSA and each PMSA facility are required to establish and maintain Blue Card registers of all Personnel involved in child-related activities which includes:

- (1) whether or not the person requires a Blue Card (if not, why not e.g. the parent exemption applies);
- (2) the type of application (e.g. paid or volunteer);
- (3) when the person applied and/or the date of issue of the positive notice and Blue Card;
- (4) the expiry date of the Blue Card;
- (5) the renewal date (an application must have been lodged prior to the expiry of a Blue Card for the person to be permitted to continue working in child-related employment after the expiry of the card and before receipt of the new card – for volunteers the application must be lodged at least 30 days prior to the expiry);
- (6) whether a negative notice has been issued;
- (7) any change in status to a Blue Card (e.g. a change in Police Information, the Blue Card is cancelled or suspended);
- (8) where there is a change in Police Information, the date of receipt of information of the change;
- (9) when a Blue Card holder leaves the facility and the date the facility informs Blue Card Services, and
- (10) any change of personal information of a Blue Card holder, including the date they informed Blue Card Services (Note: it is an offence for an employee to fail to notify Blue Card Services, on the appropriate form, within 14 days, of any change in personal details).

The PMSA and all PMSA Facilities will conduct internal audits of our Blue Card register annually, and we will arrange an external audit every four years.

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6.4 PMSA Child Protection Policy

The PMSA Child Protection Policy outlines the commitment of the PMSA and the PMSA Facilities to the welfare and well-being of all children in their care. The Policy covers information for handling disclosures or suspicions of harm, including the reporting of physical abuse, emotional or psychological abuse, sexual abuse or exploitation as well as neglect, inappropriate behaviour and self-harm.

The PMSA Child Protection Policy applies to all PMSA Personnel and is available:

- (1) on the PMSA website;
- (2) on the website of each PMSA facility;
- (3) in the Staff Policy Handbook of each PMSA facility;
- (4) at reception of each PMSA facility; and
- (5) in student handbooks (summarised version).

6.5 PMSA Code of Conduct

The PMSA Code of Conduct for homestay arrangements outlines the standard of behaviour expected of all homestay Personnel and contractors engaged by PMSA, including as it relates to interactions and relationships with children.

6.6 PMSA Homestay Child Protection Policy

The PMSA Homestay Child Protection Policy provides written processes to ensure that PMSA schools and homestay hosts arranged by and for PMSA schools comply with the Education Services for Overseas Students (ESOS) Act 2000 (Cth) and the requirements of Standard 5 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 for ensuring the suitability of accommodation, support and general welfare for homestay students under 18 years of age.

6.7 PMSA Professional Relationships with Students Policy

The PMSA Professional Relationships with Students Policy informs all Personnel and contractors that PMSA will not tolerate any action that constitutes inappropriate behaviour compromising their ability to have professional relationships with students. Such action may 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 Personnel and what an individual can do to address the inappropriate behaviour. This policy promotes and encourages professional relationships with students.

6.8 PMSA Social Media Policy

Protecting children in the care of PMSA Facilities 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 clarifies how Personnel of the PMSA Facilities should conduct themselves in their use of social media. It provides guidelines for all Personnel 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 children and adult students.

6.9 Individual PMSA facility Information, Communication and Technology (ICT) Policy

Cyber safety is a serious risk management issue for the PMSA and our facilities in relation to child protection. Each PMSA facility has a policy about the appropriate use of information technology. The policy outlines the protocols and procedures for the use of our electronic devices, including internet access, email protocols, electronic record access, security information and confidentiality requirements.

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6.10 School's Accreditation Manual

The PMSA's Schools Accreditation Manual provides all the PMSA schools with strategies to meet the accreditation requirements of The Education (Accreditation of Non-State Schools) Act 2017 which requires the PMSA schools to provide evidence of written processes about how the school will respond to harm or allegations of harm to a student under 18 years old and the appropriate conduct of staff and students. The processes include a process for reporting sexual abuse or suspected sexual abuse and likely sexual abuse in compliance with the Education (General Provisions) Act 2006 and the process for reporting a reportable suspicion of harm under the Child Protection Act 1999. Furthermore, the governing body must ensure that staff, students and parents are made aware of the processes; that staff are trained in implementing the processes; that the school is implementing the processes; and that the processes are readily accessible by staff, students and parents. The PMSA Child Protection Policy has details of all the reporting requirements.

6.11 Student Guide for Protection from Abuse or Harm

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

6.12 Ten Commandments of Child Protection for Staff at the PMSA Schools

The PMSA has developed the "Ten Commandments of Child Protection for Staff at the PMSA Schools and Workplaces", designed to cover the 10 most important things for individuals to remember, as employees of the PMSA, in respect of child protection.

All PMSA child protection policies and risk management strategies are available on the PMSA website or on the PMSA Staff Portal.

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

7. Selection and screening

7.1 Selection

We 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. It 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.

In choosing a homestay host we will comply with any relevant legislation. We will satisfy ourselves about 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 our homestay programme, all prospective homestay hosts must agree to uphold the provisions of the PMSA and our school's policies, procedures and codes of conduct.

We have implemented a general policy to select homestay hosts known to us, such as parents of the school, members of the school community and those families already established as homestay hosts for other reputable organisations within the local area.

In selecting a homestay host, we will ensure (as a minimum) that:

- (1) host families are carefully selected from within the school community (where possible).
- (2) all host families have Blue Cards as required by Queensland law.

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- (3) host families are interviewed and assessed by a trained school-based homestay co-ordinator.
 - (4) host families receive a comprehensive homestay information pack, including a Homestay Handbook, to ensure their visiting student has a fulfilling Homestay experience.
 - (5) host families can provide visiting students with suitable accommodation and a stable environment for the duration of their stay.
 - (6) host families are aware of, and can effectively manage potential risks associated with activities undertaken by visiting students.
 - (7) host families agree to provide assistance to access appropriate transport to and from school and related school activities.
 - (8) host families agree to the school's Homestay Code of Conduct and the PMSA Child Protection Policy.
- 7.2 We have an established homestay information pack, which in addition to the Homestay Handbook, includes:
- (1) an introductory letter to homestay host
 - (2) an application to provide homestay accommodation
 - (3) an agreement for homestay accommodation
 - (4) instructions on how to apply for a Blue Card
 - (5) the PMSA Child Protection Policy
 - (6) the PMSA Homestay Child Protection Policy
 - (7) Homestay Code of Conduct

7.3 Screening

All homestay hosts (including parents of the school, but excluding those who are relatives of the child staying with them) must have Blue Cards) except when an exemption applies under the Act.

8. Induction

- 8.1 We value the work of homestay hosts and we accept responsibility to offer support and assistance to ensure homestay arrangements work well for all concerned.
- 8.2 Once homestay hosts have been successfully selected and screened, all new homestay hosts must attend an induction session, conducted by the school's homestay co-ordinator.
- 8.3 These induction programs are designed to make homestay hosts aware (as a minimum) of the following:
- (1) the school's commitment to providing environments which are safe, caring and supportive to children.
 - (2) the school's policies and procedures relating to protecting students in homestay arrangements from harm.
 - (3) procedures to follow when harm is disclosed or suspected.
 - (4) their rights and responsibilities:
 - (a) what is expected of them.
 - (b) what they can and can't do - the boundaries of their roles.

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- (c) the roles of the key people in the school and/or PMSA and to whom the homestay host should report or go for help.
- (d) what to expect if there is an allegation of harm made against them or to them.

8.4 Reporting and grievance procedures

We run induction sessions periodically throughout each year. They are designed to:

- (1) enhance the skills and knowledge of homestay hosts, enabling them to contribute positively to the growth and development of the students in their care;
- (2) reduce exposure to risks; and
- (3) support friendly environments for children.

We provide all homestay hosts, and prospective hosts, with a copy of the school's homestay handbook as part of the induction process.

9. Monitoring

9.1 Our homestay co-ordinator monitors the service provided by all our homestay hosts. Co-ordinator monitoring includes (but is not limited to):

- (1) conducting periodic surveys of homestay students, with an evaluation of their accommodation and welfare arrangements and taking action as required;
- (2) regular contact with the homestay host by phone and/or email to discuss and review the arrangement;
- (3) conducting informal meetings with homestay students and pastoral care meetings to monitor adjustment; at a minimum once per study period;
- (4) where appropriate, liaise with teachers of homestay students;
- (5) where appropriate, undertake occasional visits to the homestay residence to check on the wellbeing and safety of students;
- (6) school's Complaints Register;
- (7) self-assessment by homestay hosts;
- (8) exit statements by homestay students and hosts.

9.2 Homestay hosts should contact the school's homestay co-ordinator immediately if they have any concerns.

9.3 All homestay hosts are required, on an annual basis, to sign a register that they have read and understood the PMSA Child Protection Policy.

10. Professional development

The PMSA and our schools believe that ongoing improvement grows from continuous learning. We provide professional development opportunities in relation to child protection on a regular basis, to our homestay co-ordinator. In addition, we provide our homestay hosts with regular updates about child protection and risk management.

11. Planning high risk activities and special events

11.1 We have a risk register which identifies and evaluates risks involved with the accommodation, support and general welfare of a student accommodated in homestay arrangements, and a process for developing strategies to minimise the impact of these risks. The types of risks associated with homestay arrangements include:

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- (1) risks relating to the student pre departure;
- (2) risks to which the student may be exposed post arrival, and
- (3) risks relating to the student's departure from Australia.

An example of our Homestay Risk Register is in Appendix 1.

- 11.2 Potential risks to homestay students are also included as part of the standard risk management processes we apply 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.
- 11.3 All homestay hosts must 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 school hours, and risks associated with the student's general welfare, including social activities and travel.
- 11.4 We have a Risk Management Committee with the role of identifying risks to students, including those who are accommodated in homestay arrangements. Homestay hosts must report risk situations to the school's Committee, through the school homestay co-ordinator or Principal.

12. Critical incidents

We will manage any critical incident involving a homestay student in accordance with the PMSA Critical Incident Management Policy and our own Critical Incident Management Plan.

13. External contractors

All paid employees of a homestay host (if they meet the regular contact provisions) are required to be holders of Blue Cards, before commencing provision of services. These employees must agree to the school Homestay Code of Conduct and the PMSA Child Protection Policy.

14. Marketing and advertising

- 14.1 We 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:
 - (1) the permission of the parent or carer of the child has been obtained, including specification by the parent and child as to how the image will be used; and
 - (2) 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.

15. Communication and support strategies

- 15.1 Homestay students and parents
 - (1) 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.
 - (2) The PMSA Child Protection Policy is available to homestay students and parents through our website, student diaries, Homestay Handbooks and the PMSA website. The policy is also displayed on at least one noticeboard within our school and the attention of parents and students is drawn to the policy at least twice a

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year through school newsletters. A copy of the PMSA Child Protection Policy is also available from our administration staff. This Homestay Risk Management Strategy is available through our website.

- (3) We include A Student Guide for Protection from Abuse or Harm in all student handbooks. We inform students at assembly and regular classroom meetings about how to protect themselves, and to whom to report if they are concerned about their safety.

15.2 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 to the attention of all our homestay hosts through the Homestay Handbook, and in particular, during the induction process for all new homestay hosts. This Homestay Risk Management Strategy is also publicly available through our website.

16. Responding to disclosures of suspicions of harm

- 16.1 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 reporting harm. 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 must report it to the Principal either directly or through the homestay co-ordinator, and keep a written record of the actions.
- 16.2 The PMSA Child Protection Policy outlines the procedures for reporting and responding to disclosures of harm, including self-harm, regardless of whether:
 - (1) the harm to the child has been caused by a person from within or outside a PMSA school, or
 - (2) the child disclosing the harm is from within or outside a PMSA school.
- 16.3 We keep a confidential register in the Principal's office of all incidents related to sexual abuse, harm or inappropriate behaviour. Where an incident is reported, we enter full details of the incident, including the steps taken to resolve it in the register.
- 16.4 We have a comprehensive complaints handling procedure for access by staff, parents and students, in cases where an issue is not resolved to their satisfaction.

17. Managing breaches of PMSA child protection policies

- 17.1 We review all allegations of breaches of our policies and PMSA policies where the breach is connected with our school. We 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.
- 17.2 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. We deal with suspected breaches by investigation and reporting to relevant authorities where necessary.
- 17.3 Where a person believes that there has been a breach or a failure to follow due process regarding the Child Protection Policy, those matters, or incidents are to formally raised with the School in questions and utilising the individual Schools' Complaint Resolution Policy and Process.

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- 17.4 Any breach of the school's Homestay Code of Conduct must be reported to the school homestay co-ordinator as soon as reasonably practicable. Any incident involving harm of a physical or sexual nature to a homestay student, must be reported to the Principal.
- 17.5 Our homestay hosts, 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:
- (1) removal of the homestay student from the homestay residence and the control of the homestay host;
 - (2) termination of the homestay host's participation in the homestay program;
 - (3) the homestay host being reported to appropriate authorities; or
 - (4) possible criminal prosecution.

18. Governance

18.1 Risk management review

We ensure that this Homestay Risk Management Strategy is implemented, reviewed annually and updated as necessary to ensure compliance with all legislation enacted in relation to child protection.

19. Definitions

- 19.1 Act means the Working with Children (Risk Management and Screening) Act 2000 (Qld).
- 19.2 Blue Card is a positive notice issued by the chief executive of the Department administering the Act.
- 19.3 Blue Card Services means the section of the Department administering the Act responsible for processing Blue Card information, which section is usually referred to as Blue Card Services.
- 19.4 Personnel means employees, volunteers, board members and those who are concerned or take part in the management of a PMSA facility.
- 19.5 PMSA is The Presbyterian and Methodist Schools Association.
- 19.6 PMSA Facility is a school, early learning centre or child care centre conducted directly or indirectly under the PMSA's auspices.
- 19.7 Police Information, about a person, means the following-
- (1) The person's criminal history;
 - (2) Investigative information about the person;
 - (3) Information as to whether the person is or has been-
 - (4) a relevant disqualified person; or
 - (5) the subject of an application for a disqualification order; or
 - (6) named as the respondent to an application for an offender prohibition order.
- 19.8 Regulation means the Working with Children (Risk Management and Screening) Regulation 2020 (Qld).

20. Amendment register

Issue No	Date of Issue	Page No	Details of and reason for amendment
1	01/04/2019	All	Approval by the PMSA Board.
2	25/07/2019	11	Amendment to clause 17 to satisfy provisions for Non-State Schools Accreditation Board
3	01/04/2022	All	Legislative amendment only

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