



John Paul College



# JOHN PAUL COLLEGE

## HOMESTAY Risk Management

### Policies and Procedures 2011

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Independent Schools Queensland thanks the Commission for Children Young People and Child Guardian for supplying the materials used in developing the following templates.

A list of additional references can be accessed from the Commission’s website at [www.ccypcg.qld.gov.au/about/risk\\_management.html](http://www.ccypcg.qld.gov.au/about/risk_management.html)

## Legislation relating to Homestay care of children and young people

The *Commission for Children and Young People Amendment Regulation (No.1) 2006* Section 99G prescribes schools working with children and young people, including people involved in the Homestay industry, are required to have a Risk Management Strategy in place to address the following specific criterion:

- a) a statement about commitment to the safety and wellbeing of children and the protection of children from harm
- b) a Code of Conduct for interacting with children and young people
- c) procedures for recruiting, selecting, training and managing people engaged or proposed to be engaged by the operator, as the procedures relate to the safety and wellbeing of children and the protection of children from harm
- d) policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines
- e) a plan for managing breaches of the Risk Management Strategy
- f) policies and procedures for compliance with part 6 of the Act, including:
  - i. implementing and reviewing the Risk Management Strategy, and
  - ii. keeping a written record, in relation to matters under part 6, about each person engaged by the operator, for example:
    - whether or not the operator considers the operator must apply for a prescribed notice about the person, and
    - whether or not an application for a prescribed notice has been made by the operator about the person, and
    - if a positive notice has been issued for the person – the date of expiry of the notice
- g) risk management plans for high risk activities and special events
- h) strategies for communication and support, including:
  - i. written information for parents and persons engaged by the operator that includes details of the operator's Risk Management Strategy or where the strategy can be accessed, and
  - ii. training materials for people engaged by the operator to:
    - help identify risks of harm and how to handle disclosures or suspicions of harm, and
    - outline the operator's Risk Management Strategy.

## Homestay Policies and Procedures Compliance Checklist

<b>Risk management issues pertaining to children and young people under care of your school</b> <i>from Commission for Children and Young People Amendment Regulation (No.1) 2006</i>	<b>Do you have this included in existing policies? Y/N</b>
Statement of Commitment to the safety and wellbeing of children and the protection of children from harm	Y
Code of Conduct for interacting with children and young people in the Homestay industry	Y
Procedures for recruiting, selecting, training and managing Homestay	Y
Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines	Y
Plan for managing breaches of the Risk Management Strategy	Y
Policies and procedures for compliance with Part 6 of the Act i) including: <ul style="list-style-type: none"> <li>i. implementing and reviewing the Risk Management Strategy, and</li> <li>ii. keeping a written record, in relation to matters under part 6, about each person engaged by the operator, for example:               <ul style="list-style-type: none"> <li>- whether or not the operator considers the operator must apply for a prescribed notice about the person, and</li> <li>- whether or not an application for a prescribed notice has been made by the operator about the person, and</li> <li>- if a positive notice has been issued for the person – the date of expiry of the notice</li> </ul> </li> </ul>	Y
Risk management plans for high risk activities and special events	Y
Strategies for communication and support	Y

<b>Risk Management Child Protection Policy for John Paul College</b>	
<b>Name of School</b>	John Paul College
<b>Title of Policy</b>	Risk Management Policy: Child Protection
<b>Mission Statement</b>	It is the goal of John Paul College to create safe environments for Homestay students and an environment in which they can successfully pursue their academic careers and personal development.
<b>Statement of Commitment</b>	<input type="checkbox"/> John Paul College 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.
<b>Aims, objectives and strategies</b>	<p>The purpose of this Risk Management Policy for Child Protection is to:</p> <input type="checkbox"/> promote the well being of Homestay students and to protect them from harm;
	<input type="checkbox"/> reduce the risk of harm to Homestay students through written policies and procedures, including information and training, for all staff and volunteers involved with John Paul College.
<b>References</b>	<p>Some references that may be applicable are:</p> <input type="checkbox"/> <i>Commission for Children and Young People and Child Guardian Act 2000</i> <input type="checkbox"/> <i>Commission for Children and Young People Amendment Regulation (No.1) 2006</i> <input type="checkbox"/> <i>Child Protection Act 1999:</i> <a href="http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/C/ChildProtectA99.pdf">http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/C/ChildProtectA99.pdf</a> <input type="checkbox"/> <i>Education (Overseas Students) Act 1996:</i> <a href="http://www.legislation.qld.gov.au/LEGISLTN/ACTS/1996/96AC071.pdf">http://www.legislation.qld.gov.au/LEGISLTN/ACTS/1996/96AC071.pdf</a> <input type="checkbox"/> <i>Education (Overseas Students) Regulation 1998:</i> <input type="checkbox"/> <a href="http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/E/EducOverStuR98.pdf">http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/E/EducOverStuR98.pdf</a> <input type="checkbox"/> <i>Education (General Provisions) Act 2006:</i> <a href="http://www.legislation.qld.gov.au/LEGISLTN/ACTS/2006/06AC039.pdf">http://www.legislation.qld.gov.au/LEGISLTN/ACTS/2006/06AC039.pdf</a> <input type="checkbox"/> <i>Migration Act 1958:</i> <input type="checkbox"/> National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas ESOS 2007

<p><b>Definitions</b></p>	<p><b>Homestay Provider</b> is the school or person arranging the Homestay student's accommodation.  <b>Homestay Host</b> is the volunteer or paid family who cares for the Homestay student in their home.  <b>Homestay Student</b> is the child or young person staying in the home of the Homestay Host.</p>
<p><b>Who must comply with this policy</b></p>	<p>This Policy applies to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Homestay Providers and staff of the school</li> <li><input type="checkbox"/> Homestay Hosts</li> <li><input type="checkbox"/> Residents of Homestay Host homes</li> <li><input type="checkbox"/> Homestay students</li> <li><input type="checkbox"/> Visitors to Homestay host home</li> </ul>
<p><b>Scope</b></p>	<p>This Policy relates to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Statement of Commitment to the safety and wellbeing of children and the protection of children from harm</li> <li><input type="checkbox"/> Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines</li> <li><input type="checkbox"/> Plan for managing breaches of the Risk Management Strategy</li> <li><input type="checkbox"/> Strategies for communication and support</li> </ul>
<p><b>Implementation</b></p>	<p>This Policy will become effective as at <b>31 August 2008</b> and be available for viewing by stakeholders via:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Policy available online</li> <li><input type="checkbox"/> Induction and ongoing training for Homestay Provider Coordination Staff and Homestay Hosts</li> <li><input type="checkbox"/> Homestay Student Handbook/Information Sheet</li> </ul>
<p><b>Monitoring of compliance with the Policy</b></p>	<p>Adherence to this Policy will be monitored by the Homestay Provider via:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Complaints Register (ensure incident reports for students and hosts are linked if they relate to the same incident)</li> <li><input type="checkbox"/> Surveys</li> <li><input type="checkbox"/> Ongoing counselling and communication with students</li> <li><input type="checkbox"/> Ongoing telephone calls to students and hosts</li> <li><input type="checkbox"/> Regular email contact with students and host</li> <li><input type="checkbox"/> Homestay induction and training meetings</li> </ul> <p>Reports regarding compliance/non-compliance with this Policy will be provided to the Headmaster of John Paul College at every occurrence and at least every 12 months.</p>

<b>Breaches</b>	<p>Breaches of this Policy will be managed via:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Breaches will be determined by the Homestay Coordinator in consultation with the Director, John Paul International.</li> <li><input type="checkbox"/> Suspected breaches will be dealt with by investigation and reporting to relevant authorities where necessary (refer to the School's Child Protection Policy, and, in particular, the section on Reporting Harm or Abuse);</li> <li><input type="checkbox"/> Penalties for breaches will be enforced in accordance with the Code of Conduct.</li> </ul> <p>Appeals process will be as specified within the Complaints Procedure.</p>
<b>Evaluation and review</b>	<p>This Policy will be evaluated and reviewed annually by the School's Homestay Coordinator in consultation with the Child Protection Officer/Committee. A copy of any changes will be provided to the Headmaster for endorsement.</p>
<b>Contacts</b>	<p>Further details and information concerning this Policy are available from the Homestay Coordinator on telephone (07) 3826 3442 or (07) 3826 3474 or Student Counsellor.</p>
<b>Date</b>	<p>This Policy was last reviewed and updated on 21 March 2011.</p> <p>Next Review: <b>31 March 2012</b></p> <p>Signed: Position: Russell Welch Director, John Paul International</p>

# Guidelines for Mutual Respect

## Values and principles

- It is the goal of John Paul College to create safe environments for Homestay students and an environment in which they can successfully pursue their academic careers and personal development.
- John Paul College 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.

## Who must comply with this Code of Conduct?

This code of conduct applies to all paid staff and volunteers, Homestay students, other students, and all other Homestay stakeholders.

## Related documents

The Guidelines for Mutual Respect should be read in relation to the following school policies:

- Child Protection
- Privacy
- Grievance/Complaints Procedures
- Recruitment and Selection
- Anti-Discrimination

## Standards expected

John Paul College will uphold the following principles under this Policy:

- Protecting students from harm and the risk of harm is fundamental to maximising their personal and academic potential.
- John Paul College recognises that people who are subjected to abuse are harmed by it.
- At John Paul College, the welfare and best interests of the child will always be a primary consideration.
- John Paul College expects our students to show respect to our staff and volunteers and to comply with safe practices.
- All employees must ensure that their behaviour towards and relationships with students reflect proper standards of care for students, and are not unlawful.
- Sexual acts by an adult employee or volunteer with a student who is a child will always be sexual abuse.
- John Paul College will respond diligently to a report of suspected or actual harm, or risk of harm to a student.
- Reprisals against students or others making a complaint will not be tolerated.
- Student management practices will be administered with respect and in a manner which maintains the student's dignity.
- John Paul College will act fairly and reasonably towards an employee or volunteer who is the subject of allegations of improper conduct.
- John Paul College will support an employee or volunteer who is the subject of a proven false allegation of causing harm to a student.
- Anybody within John Paul College who becomes aware or reasonably suspects that a student is being harmed must report it to the School in accordance with the School's Procedures for Reporting Harm.

- John Paul College will take disciplinary action against employees who harm others, and appropriate action against volunteers who harm others.
- John Paul College will not permit people to work in a position if the School believes on the basis of all information available that, if the allegations against them were wholly or partly true, there would be an unacceptable risk that others might be harmed.
- John Paul College will cooperate with state authorities in resolving allegations of harm.

### **Breaches of the Guidelines for Mutual Respect**

*If Guidelines for Mutual Respect is breached the College has a Grievance Policy outlining steps necessary to deal with any breaches in the Guidelines for Mutual Respect.*

*Students may nominate a support person during any stage of a dispute.*

## **Procedures for recruiting, selecting and training and managing Homestay Hosts**

John Paul College recognises that risk management for child protection begins with the recruiting, screening and selection of the right people to work in schools, and continues by having consistent procedures in place for all staff (including volunteers) and contractors to follow, with adequate management and supervision to ensure they comply with these procedures.

The School therefore has a written policy on the selection, supervision and management of staff, volunteers and contractors, including Homestay parents.

### **Procedure for recruitment/selection of Homestay**

1. Initial inquiry regarding entry to the Homestay program is directed to Homestay coordinator
2. Homestay coordinator outlines the requirements and sends out a Homestay application package to interested person/s.

The **Homestay application package** contains the following documents:

- Criteria for accepting Homestay families into the John Paul College Homestay Program
  - Homestay Family Application form
  - Duty of care statement
  - School Guidelines for Mutual Respect
  - Blue card application
  - Homestay Guidelines (given, if approved)
  - Cover letter outlining the procedure for entry to the program and explaining the requirement for an inspection of accommodation and interview with accommodation officer before final acceptance
3. Once completed forms are received and relevant document is sighted. The Homestay Officer arranges inspection of accommodation and interview with family.
  4. At inspection the Accommodation Officer completes Homestay Inspection report and answers any further queries regarding entering the program.
  5. The accommodation officer returns Homestay Inspection report to Accommodation Officer and reviews relevant points.
  6. Homestay Inspection report is sent to Director, John Paul International for approval.
  7. Prospective Homestay host is informed of the outcome.

### **Additional notes regarding recruitment/ selection of Homestay hosts**

#### **1. Screening**

It is the policy of the School that all members of staff, volunteers and contractors are cleared to work with children:

- all members of academic staff are registered or provisionally registered with the College of Teachers (formally Board of Teacher Registration), or have received special dispensation from the College;
- all non-teaching members of staff and all volunteers and contractors (including Board members), who are required to hold a blue card, have a current card;

- in some cases, deemed appropriate by the School, paid or unpaid employees who work with children but are not required to hold a blue card (e.g. a parent volunteer) may be asked to consent to a criminal history check through the Queensland Police Service;
- where volunteer parents are working with children, it will always be in the presence of academic or non-teaching staff who are cleared to work with children.

### **Induction**

John Paul College has a written induction process which applies to all staff, volunteers and contractors (hereafter called 'staff') during the first twelve months of appointment, and includes procedures for making staff members aware of the legislation on Child Protection, and the Code of Behaviour expected of staff.

The Induction process includes, but is not limited to:

- professional development about identifying and reporting harm or suspected harm;
- making staff aware of the protocols for the protection of children, such as matters related to being alone with a child, physical contact, privacy, language, bullying etc.
- working through policies related to child protection such as;
  - behaviour management;
  - anti-bullying; and
  - disabilities policy.

### **Procedures specific to Homestay Hosts**

All new Homestay hosts are made aware of policies and information relevant to the Homestay Program when receiving Homestay Guidelines.

### **Professional Development**

All staff members are required, on an annual basis, to sign a register that they have read and understand the School's Child Protection Policy.

The School provides Professional Development in relation to child protection on a regular basis and a register is kept of such activities.

In addition Homestays receive regular newsletters and provide updates regarding legal compliance with respect to child safety and risk management, to address any issues regarding Homestay and as a means of developing networks amongst Homestay families.

## **Blue Card Register**

All staff members, volunteers, including Board members, Homestay parents and other people in contact with students of the school must have current Blue Cards or Exemption Cards where required by legislation.

The School maintains an electronic register of:

- all Teacher Registration numbers and Exemption Card number
- Blue Card numbers for all staff including homestay parents and the dates for renewal.

# Policies and Procedures for Handling Disclosures or Suspicions of Harm

## What is harm?

*Harm* is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by:

- Physical, psychological or emotional abuse or neglect;
- Sexual abuse or exploitation.

## Dealing with Incidents

John Paul College keeps a record of all incidents related to sexual abuse, harm or inappropriate behaviour.

Where legislation requires, incidents of harm or suspected harm are reported to the relevant state authorities immediately, and the incident is noted in the register.

Where an incident of inappropriate behaviour is reported, full details, including the steps taken to resolve the incident, are entered in the register.

Staff, parents and students can access the School's comprehensive complaints handling procedure in cases where an issue is not resolved to their satisfaction.

## Procedures for Reporting Harm

Staff members and volunteers at John Paul College are expected to reflect the highest standards of care in their behaviour towards and relationships with students.

Employees/volunteers of John Paul College must not under any circumstances engage in physical or emotional abuse or engage in sexual contact of any nature with a student of the school. It is irrelevant whether the conduct is consensual or non-consensual, or condoned by parents or caregivers. **The age of the student is also irrelevant.**

Failure to behave in an appropriate manner may result in criminal proceedings and/or disciplinary action, including dismissal/ removal from the Homestay program.

The following Table outlines the procedures for reporting harm which will apply in John Paul College.

Where a reference is made to **PROVIDING A WRITTEN REPORT** in the below procedures, the following matters are to be included in the written report:

1. Name of the person giving the report (the 'first person');
2. The student's name and sex;
3. Details of the basis for the first person becoming aware, or reasonably suspecting, that the student has been sexually abused by an employee of the school;
4. Details of the abuse or suspected sexual abuse;
5. Any of the following information of which the first person is aware:
  - the student's age;
  - the identity of the employee who has abused, or is suspected to have abused the student;

## ACTION PLAN FOR REPORTING HARM AT JPC

Subject	If	Then
Reporting Harm (Accreditation Regulation s.10)	You as a student are aware or reasonably suspect that harm has been caused by anyone to a student of the school who was under 18 at the time	report it to any staff member or after hours Student Assistance Hotline: 1800 024 157.
	You are a staff member and you are aware or reasonably suspect that harm has been caused by anyone to a student of the school who was under 18 at the time	report it to the principal or to the deputy principal  keep a written record of your actions
	You are:- the principal or the deputy principal and you receive a report of harm or suspected harm to a student of the school; <b>and</b> you are aware of the harm having been caused or you reasonably suspect the harm to have been caused	report it to the police or the Department of Child Safety  keep a written record of your actions
Reporting Inappropriate Behaviour (Accreditation Regulation s.10)	you are a student and you wish to report behaviour by a staff member that you consider inappropriate  you, the Principal or Dean of Students receive the report under the preceding step	report the behaviour to The Principal or Dean of Students  interview the student  interview the staff member/volunteer named in the report  interview any other person who may be able to provide useful information report your findings to the principal, if you are the Dean of Students, with your recommendation for action to be taken  as principal take action on the basis of the report
Reporting Sexual Abuse Education (General Provisions) Act s.146B)	you are:- <ul style="list-style-type: none"> <li>a staff member; and</li> <li>aware or you reasonably suspect that an employee of the school has sexually abused a student of the school who was under 18 at the time</li> </ul>	give a written report about the abuse to the Principal or a member of the board of directors immediately  contents of the written report are prescribed by regulation made under the Education (General Provisions) Act
	You, the Principal, or a member of the board of directors, receive a report under the preceding step	give a copy of the report to a police officer immediately

# Risk Management for High Risk Activities and Special Events at John Paul College

## Potential risks

Environmental	Human	Equipment
Disease Natural disaster (storm) Homestay environment Educational environment Transport Orientation of student or host Information (inadequate) Fear of Australian pests Medication / drugs Food Accommodation (room)	Selection of Homestay host Personality clash Cultural issues Students and guests Child abuse	Familiarity with cooking equipment Evacuation procedures Electrical equipment Appliances Lawn mowers

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
Inadequate orientation of student	<ul style="list-style-type: none"> <li>incorrect information / understanding / misinterpretation of information</li> <li>translation of information</li> <li>timing of orientation session</li> <li>transport issues</li> <li>reporting of issues</li> <li>safety information</li> <li>ongoing Communication Strategy</li> </ul>	<ul style="list-style-type: none"> <li>information is consistent from JPC and Homestay host</li> <li>written information in a number of languages</li> <li>modelling behaviours by Homestay host and JPC</li> <li>open door policy for reporting</li> <li>one on one sessions if necessary</li> </ul>	Unlikely	Extreme	Extreme
Poor criterion for selection of Homestay hosts	<ul style="list-style-type: none"> <li>not addressing the element of the RMS</li> <li>inadequate data gathering</li> <li>lack of formal process</li> <li>inspection process (interview)</li> <li>exchange of information</li> <li>who conducts the interview from the organisation</li> <li>follow up inspections of Homestay facility</li> </ul>	<ul style="list-style-type: none"> <li>registration of Homestay host JPC</li> <li>written criterion that is communicated to Homestay hosts</li> <li>regular contact with Homestay hosts</li> </ul>	Rare	Extreme	High

	<ul style="list-style-type: none"> <li>• visual evidence of accommodation</li> <li>• orientation of prospective Homestay hosts</li> <li>• what is the motivation of the Homestay host</li> </ul>				
Student billeted with Homestay host	<ul style="list-style-type: none"> <li>• student suffering from mental health issues not appropriately managed e.g. student suffering depression may self harm</li> </ul>	<ul style="list-style-type: none"> <li>• Homestay host trained in reporting risk of harm. Homestay manager trained in managing risks of harm to students, including networking with other support agencies.</li> </ul>	Possible	Extreme	Extreme
Student billeted with Homestay host	<ul style="list-style-type: none"> <li>• Mishandling of student's disclosure of harm that occurred in country of origin</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	Possible	Extreme	Extreme

## Agreement to comply with John Paul College's Risk Management Strategy

It is a breach of John Paul College's Risk Management Strategy for any person to whom this strategy applies to have been found to have:

- done anything contrary to the policies referred to within the Strategy
- breached the Guidelines for Mutual Respect
- 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 Policies contained within this Strategy, or
- engaged in child abuse.

I have read the following documents:

- Statement of Commitment to the safety and wellbeing of children and the protection of children from harm
- Guidelines for Mutual Respect for interacting with children and young people in the Homestay industry
- procedures for recruiting, selecting, training and managing
- policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines
- plan for managing breaches of the Risk Management Strategy
- policies and procedures for compliance with Part 6 (this relates to Blue Cards) of the Act
- risk management plans for high risk activities and special events, and
- strategies for communication and support.

Having read these documents, I understand John Paul College's 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 it provides services to.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_

Date: \_\_\_\_\_

## **Strategies for communication and support**

### **John Paul College Risk Management Strategy Communication Policy**

The location/availability of John Paul College's Risk Management Strategy for Child Protection will be publicised in the following manner in order to provide access to the Strategy to all stakeholders within the Scheme:

- Homestay Guidelines issued upon approval into program;
- Intranet for general staff;
- Internet site;
- Updates communicated during staff meetings;
- Student orientation handbook.

### **Training and Information**

John Paul College 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 communication with Homestay Officer and hosts;
- Information / Application package for families involved in the Homestay program;
- Orientation / Induction handbook for Students; and
- Training / Workshops for key staff and on line manuals for all staff and Homestay parents.