International Student Care Australia (ISCA) Risk Management (Child Protection) Strategy

Note: This policy is subject to change from time to time. Please check all ISCA Policies on a regular basis for updates.

Reviewed 1 January, 2018

Introduction

International Student Care Australia (ISCA) has adopted the following Risk Management (Child Protection) Strategy in compliance with our obligations under the *Working with Children (Risk Management and Screening) Act 2000(WWC Act)* and the *Working with Children (Risk Management and Screening) Regulation 2011* to promote and protect children and young people.

International Student Care Australia (ISCA):

- recruit, assess, approve and engage appropriate homestay hosts
- place overseas and international students ('students') in homestays
- are responsible for the ongoing monitoring of homestay placements
- ensure appropriate arrangements for the student's accommodation and welfare are in place

For the purposes of the *WWC Act* homestay hosts are 'engaged in regulated employment'[1]. Each adult residing in the home is taken to be a volunteer 'engaged in regulated employment'[2].

This means that homestay hosts and adult (18 years and over) residents of the home require blue cards (or exemption cards for registered teachers and police officers).

Each year ISCA must develop a risk management strategy[3] ('strategy') about homestay hosts that:

- implements practices and procedures regarding the engagement of homestay hosts to promote the wellbeing of children and to protect the children from harm
- includes[4]
    - a statement of commitment to the safety and wellbeing of children and the protection of children from harm
    - a Homestay host code of conduct for interacting with children
    - procedures for recruiting, selecting, training and managing homestay hosts
    - policies and procedures for handling disclosures or suspicions of harm
    - a plan for managing breaches of this strategy
    - policies and procedures for compliance with the blue card system
    - risk management plans for high risk activities and special events
    - strategies for communication about this strategy and support for homestay hosts (e.g. training).

[1] Some limited exceptions apply. Contact Blue Card Services for advice. ISCA employees, please refer to the *WWC Act* Information Sheets for further information.

[2] Some limited exceptions apply. Contact Blue Card Services for advice. ISCA employees, please refer to the *WWC Act* Information Sheets for further information

[3] See s 171 *WWC Act*.

[4] See s 3 *Working with Children (Risk Management and Screening) Regulation 2011*.

Purpose

The purpose of this strategy is to:

- comply with the *WWC Act*
- to assist ISCA to comply with the *WWC Act*
- to recognise that students who are under 18 years of age and in Australia without a parent to care for them are particularly vulnerable
- to provide an overarching framework for homestays which ensures students are placed into carefully selected homes where they will be safe, cared for and supported during their stay
- to promote the safety and wellbeing of students living with homestay hosts
- to minimise the likelihood of harm to students living with homestay hosts.

Scope

This strategy applies to:

- all ISCA staff
    - whose work involves the homestay program
    - interacting with students who are, or are applying to be living with homestay hosts
    - homestay hosts
    - residents of and visitors to the homestay host home
    - students living with homestay hosts.

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Mission Statement

International Student Care Australia (ISCA) is committed to the safety and wellbeing of children and the protection of children from harm by providing a safe and supportive environment for Homestay Students where they can successfully pursue their academic careers and personal development.

Statement of Commitment

International Student Care Australia (ISCA) is dedicated in ensuring that all Homestay Students have the right to feel safe from harm, 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.

ISCA will actively mitigate risks that it has the lowest tolerance for, including child and student safety.

ISCA demonstrates this by:

- carefully selecting homestay hosts
- matching students with compatible homestay hosts
- ongoing monitoring of homestay host arrangements, formally and informally
- making staff, homestay hosts and students aware of relevant:
    - legislation
    - this strategy
    - policies
    - procedures, and
    - the process to follow to immediately report harm, risk of harm or suspicion of harm
- taking action where there has been a breach of:
    - legislation
    - this strategy
    - a policy or procedure

Code of Conduct

This Code of Conduct outlines the expected behaviours of all persons interacting with students in a homestay placement.

All people involved in the homestay program

All people (including students) should act in a way that would be considered appropriate when viewed by a third party. People should not put themselves in a position where they are vulnerable to accusations of wrongdoing, for example:

- residents of the homestay home and visitors should not be alone with a student in a bedroom or bathroom with the door closed
- homestay students should not be alone with another person (for example, a younger child) in a bedroom or bathroom with the door closed

Unacceptable behaviour includes:

- domestic and family violence
- aggression, intimidation, abuse, name calling and swearing
- inappropriate comments or behaviour related to a person's race, religion, disability, gender or sexuality (including racist or sexist jokes)
- sexual harassment (for example, suggestive comments or jokes)
- inappropriate or unwanted physical contact (hugging can be unwanted)
- child abuse
- criminal offences

Homestay hosts

- maintain a 'professional' relationship with the student (it is important to maintain appropriate boundaries and not blur the lines between 'student' and 'friend' or 'romantic interest')
- understand there are differences in what people perceive as 'appropriate' due to age, maturity and cultural background
- ensure all physical contact would be considered appropriate by a reasonable third party
- ensure alcohol use by residents and visitors does not pose a risk to the student's safety or wellbeing (students must not drink alcohol)
- do not use or permit the use of illegal drugs in the home
- seek support to manage cultural issues from ISCA or the school, if required
- treat students with respect and to listen to their concerns
- are alert to any unsocial or improper behaviour by a homestay student
- report to ISCA any student protection matters, including:
    - student sexualised behaviour,
    - unlawful sexual relationships between children under 16 years of age,
    - harm caused by another student and
    - student self-harm
- refer all issues of student misbehaviour to ISCA (students must not be subjected to verbal abuse or physical punishment)
- contact the 24-hour emergency telephone number for ISCA, for immediate support

Supervision

- ensure age-appropriate supervision and care for students outside of school hours, with extra precautions when visitors are in the house and if there is use of alcohol on the premises
- never leave a student unsupervised overnight
- contact ISCA as soon as possible in advance if you cannot supervise the student (for example, if you have to travel and the homestay student cannot travel with you)
- monitor the student's outside of school hours activities to ensure they are safe

Injury/illness

- ensure first aid is administered (if an appropriately qualified person is available) if a student is injured (seek permission from the student, where possible)
- arrange medical assistance for the student when required
- ensure appropriate care and supervision of a student who is sick or injured
- report all injuries and illnesses to the school when they will be absent from school. The homestay host parent must contact the school absentee line each day the student is absent (students are not permitted to report their own absenteeism)

Transportation

- permit safe travel arrangements, for example, in registered and roadworthy vehicles with appropriate insurance
- do not permit the student to travel in a vehicle operated by a P-plate driver
- do not permit the student to travel in a vehicle operated by a learner licence holder ("L-plates")
- ensure use of public transport is safe and age appropriate (with appropriate arrangements to and from the bus stop/train station etc.)

Privacy

- respect the privacy of the student while exercising appropriate supervision (for example, knock and wait for permission before entering the bedroom and bathroom)
- get consent before taking the student's photograph or making a video recording (students must be appropriately clothed)
- get consent before sharing information about the student (e.g. posting photos or comments about them on social media).

Students

- respect the household rules, household property and residents of the home
- show consideration and courtesy to all residents of the home
- ensure their homestay knows where they are and can contact them at all times
    - mobile phone must be charged and with credit and always turned on
    - they must be contactable at ALL times
- respect the privacy of your homestay family, for example:
    - knock and wait for permission before entering a bedroom, bathroom or toilet;
    - get consent before taking photographs or making video recordings of the residents of the home (persons must be appropriately clothed)
    - seek permission before posting any information about the family or the home on social media
    - be respectful in any social media posts or public comments
- use the internet and social media appropriately, following homestay family rules and complying with Australian laws
- comply with Australian laws and the conditions of their visa
- do not drink alcohol, smoke, misuse prescription medication or use illegal drugs
- do not do anything that endangers their safety or the safety of other people, for example:
    - no lighting candles in their bedroom
- do not do anything that may bring their school or the international student homestay program into disrepute.

ISCA staff

- must comply with
    - the *ISCA Staff Code of Conduct* which states employees must act appropriately and professionally at all times in their interactions with students and observe appropriate boundaries, behaviour and contact with students. In addition, the Code of Conduct covers the employee's duties in relation to risk management and duty of care obligations to students.
    - ISCA policies and procedures
    - the law.

Procedures for recruiting, selecting, training and managing Homestay hosts

Refer to *ISCA's Recruit, Assess, Approve and Engage Homestay Host Procedures.*
Relevant policies and procedures for the ISCA homestay program are available at www.isca.net.au

Procedures for handling disclosures and suspicions of harm

If you become aware or suspect that a student has been harmed or is at risk of harm you must take immediate action. Everyone has a responsibility to report a suspicion of harm.

ISCA employees: inform the Director of ISCA, the student's, international student co-ordinator and the school principal and the police and/or Child Safety Services, where relevant. The *ISCA Critical Incident Policy and Procedure*s should be initiated. The school has a mandatory obligation to report any suspicion of harm.
For allegations against employees, follow the Allegations against employees in the area of student protection procedure.

Homestay hosts: inform the Director of ISCA and the police and/or Child Safety Services, where relevant.

Students: inform your Homestay host, ISCA or school (for example, the international student coordinator or the school principal) and the police and/or Child Safety Services, where relevant.

What is 'harm'?
Harm is defined as 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 and may include physical, psychological or emotional abuse, neglect and sexual abuse or exploitation. Harm can be caused by a single act, omission or circumstance or a series or combination of acts, omissions or circumstances.

Identifying harm
Indicators of harm may include:

- demanding or aggressive behaviour
- sleeping difficulties, often being tired and/or falling asleep
- low self-esteem
- difficulty relating to adults and peers
- abusing alcohol or drugs
- being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable
- feeling suicidal or attempting suicide
- having difficulty concentrating
- being withdrawn or overly obedient
- being reluctant to go home
- creating stories, poems or artwork about abuse.

For further information on signs of child abuse and neglect please see: https://www.qld.gov.au/community/getting-support-health-social-issue/about-child-abuse

ISCA staff managing and recording a disclosure of harm
If a student voluntarily discloses information, the staff member should listen and document the disclosure, as soon as possible, using the student's own words. If the student makes a disclosure in a public setting and it is inappropriate to continue the conversation immediately, the student should be given an opportunity to finish their disclosure in a more private setting with little delay.

The quality and type of information a student shares can be influenced by the questions or statements posed. If it is necessary to ask questions to clarify information or circumstances, the questions should be open ended, non-leading and carefully worded to encourage students to share information in their own words.

A clear and accurate record should be kept of what questions were asked and the student's responses. Where possible, the record should reflect the student's own words and include relevant dates, times and locations.

Homestay hosts managing and recording a disclosure of harm

- remain calm and listen attentively, actively and non-judgementally
- ensure there is a private place to talk
- encourage the student to talk in their own words and ensure just enough open-ended questions are asked to act protectively (e.g. 'Can you tell me what happened'…or 'Can you tell me more about that').
- reassure the student they have done the right thing by telling you
- advise the student that you need to tell someone else who can help the child
- document the disclosure clearly and accurately, including a detailed description of:
- the relevant dates, times, locations and who was present
- exactly what the person disclosing said, using "I said," "they said," statements
- the questions you asked
- any comments you made, and
- your actions following the disclosure
- not attempt to investigate or mediate an outcome.

Reporting harm

If you suspect or are told a student has been harmed: do not conduct an investigation – report it immediately. ISCA and Homestay hosts report to the school's international student coordinator or school principal and to the Queensland Police Service or the Department of Communities, Child Safety and Disability Services (Child Safety Services), where appropriate.

Any person has the right to make a report directly to Child Safety or the Queensland Police Service.

Managing breaches of the Risk Management Strategy

A person breaches this strategy if they fail to comply with the Code of Conduct or any of their responsibilities, provided above. Specifically, any action or inaction which compromises student safety is a breach of this strategy and will be dealt with as set out below.

Who manages the breach?

The Director of ISCA is responsible for reviewing each breach and action. Breaches will be managed according to the *Ongoing monitoring of hosts and placements Procedures.*

Homestay host

Breach may result in:

- removal of the student from host residence
- termination of host's participation in the homestay program
- reports to the police or Child Safety Services, if warranted.

Students

Breach may result in:

- school discipline
- removal from the homestay home
- cancelling student's participation in the ISCA homestay program
- suspension or cancellation of enrolment

ISCA staff

Employee breaches of this strategy will be managed in accordance with processes associated with *ISCA Staff Code of Conduct.*

Others
Breach by a visitor of the Homestay host or other person will be managed by the ISCA Director and the action taken will depend on the circumstances of the breach.

Compliance with the Working with Children Act

Blue card requirements for homestay hosts are outlined in *ISCA Blue Card Policy and Procedures.*

For further information about blue card requirements and processes refer to the Queensland Government Blue Card Services website.

Risk Management Plans for High Risk Activities and Special Events

Students must not undertake high risk activities. "High-risk activities" include any activity which inherently poses an increased risk of harm, illness or injury. It does not matter if the activity is undertaken in a controlled environment under appropriate supervision. Examples of high-risk activities are extreme sports and recreational activities with dangerous elements.

ISCA's Risk Management Framework Appendix 1 is a comprehensive approach to identifying, assessing and treating risk. ISCA must consider this risk management framework when developing and completing the Risk Management plan for non-routine travel, activities and special events.

The types of non-routine travel, activities or events included under this category are activities which:

- students frequently request to participate in
- occur regularly
- are popular in the local area.

Student protection issues should be addressed as part of the standard risk management processes for these activities.

If, after completing the risk management plan, which includes a risk assessment, the inherent risk of the travel, activity or event is classified as high risk, ISCA will confer with the student's school to raise our concern on whether the student is permitted to take part.

Strategies for Communication and Support

The location/availability of *ISCA's Risk Management (Child Protection) Strategy* will be publicised in the following manner in order to provide access to all stakeholders within the Strategy:

- ISCA Orientation/induction Booklet for Homestay Hosts, Homestay Students
- Abbreviated statement concerning *Risk Management (Child Protection) Strategy* inserted into all promotional materials
- Internet site – www.isca.net.au
- Reference included in ISCA's Homestay Student Application Form
- Updates communicated during staff meetings.

Training and Information
ISCA 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:

- Ongoing training for all ISCA staff and Homestay Hosts
- Enrolment package for families involved in the Homestay Host program
- Orientation / induction handbook for Students

Related Documents

This strategy should be read in conjunction with:

- any contract between ISCA and the homestay host
- *ISCA Staff Code of Conduct*
- *ISCA Recruit, Assess, Approve and Engage Homestay Host Procedures*
- *ISCA Ongoing monitoring of hosts and placements Procedures*
- *ISCA Blue Card Policy and Procedures*
- *ISCA Student Protection procedure*
- *Working with Children (Risk Management and Screening) Act 2000*
- *Working with Children (Risk Management and Screening) Regulation 2011*
- *Working with Children Check - Blue Cards*
- *ISCA Critical Incident procedure*
- *ISCA's Risk Management Framework*

Evaluation and review

This Policy will be evaluated and reviewed annually or on a needs basis by the Director of ISCA.

Regular reviews will:

- incorporate feedback from stakeholders
- check the strategy reflects current legislation and current ISCA policies and procedures
- check the strategy continues to be effective in addressing risks of harm to students and children
- incorporate learnings from any critical incidents or reports of harm.

Contacts

Further details and information concerning this Strategy are available from ISCA on 07 3851 0704 or by email isca@isca.net.au

Appendix 1

Risk Management Framework

Managing Risks

Steps for managing risks involves a four-step process:

1. Identify the hazards
2. Assess the risks
3. Control the risks
4. Monitor and review the level of safety

By implementing effective risk management, ISCA will be taking proactive measures to minimise the risk of harm to all involved.

1. Identify the hazards

A hazard is anything that can cause harm, either physically, psychologically or emotionally. It could be caused by a faulty piece of equipment (such as students overloading adaptor plugs or allowing Homestay students to stay out after curfew. One way to identify hazards is to consider what you would do when a Homestay student enters your premises or joins in an activity.

What would you warn them about or keep them away from?

Also identify hazards to other people in your organisation such as employees, homestay hosts and their visitors. What are the potential opportunities for harm in your organisation? How might harm occur? Why might harm occur? When could harm occur?

For example:

- Who is the Homestay student with, where are they, is this situation known to you
- Insufficient communication and language barriers
- Students getting lost
- Abuse (extortion by other students, bullying, families extorting students, sexual abuse)
- Neglect (leaving the child isolated, students not being provided with enough food or a choice of food)
- Communication or cultural misunderstandings
- Lack of monitoring placements
- Boyfriends / girlfriends, partners of homestay hosts

Hazards can be identified through:

- Audits or physical inspection
- Brainstorming
- Expert judgement
- History
- Incidents or complaints
- Operational model
- Organisational experience
- Personal experience
- Scenario analysis

These **key questions** help to identify hazards:

- When, where why, how are the hazards likely to occur?
- What is the source of each hazard?
- Who might be involved?

Once the hazards have been identified, the level of risk they pose needs to be assessed.

2. Assess the risks

Risk is the likelihood that a harmful consequence (e.g. injury) will occur when people are exposed to a hazard. As such, a risk level is made up of two elements:

a. the **likelihood** of an incident happening; and
b. the **consequence** if it did happen.

To assess the level of risk inherent in an activity, consider the likelihood of an incident happening in combination with the seriousness of the consequence.

Many factors will influence the likelihood and consequence if an incident were to occur, such as the:

- frequency and duration of exposure to a hazard (e.g. sunburn, chemicals)
- Who will be involved in the activity? (under or over 18)
- What will they be doing?
- Where will they be?
- What will they be using?
- Who will be with them?

Risk factors like these make every situation different. When assessing risk, consider the risk factors that apply to the specific context, and their impact on the likelihood and consequence of an incident occurring.

The ISCA Risk Management Matrix below can be used as a guide to assist with quantifying the risk level. To use the matrix, map the likelihood and consequence of an incident occurring with the activity to arrive at the assessed risk level.

Keep in mind that when assessing risk value judgements need to be made; and when making value judgements sometimes the risk level is not always as clear cut. If undecided on a risk level, a conservative approach would be to settle on the higher risk level being considered.

Assessing the risk level is important. However, regardless of the assessed level of risk, we always have an obligation to do what is reasonably practicable to eliminate the risk, or if that is not possible, to minimise the risk.

ISCA RISK MANAGEMENT MATRIX					
Likelihood	**Consequence**				
	Insignificant	**Minor**	**Moderate**	**Major**	**Critical**
Almost Certain	Medium	Medium	High	Extreme	Extreme
Likely	Low	Medium	High	High	Extreme
Possible	Low	Medium	High	High	High
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Low	Low	Medium

Consequence	Description of Consequence
Insignificant	No treatment required
Minor	Minor injury requiring First aid treatment
Moderate	Injury requiring medical treatment or lost time
Major	Serious injury requiring specialist medical treatment or hospitalisation
Critical	Loss of life, permanent disability or multiple serious injuries

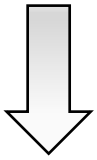
Likelihood	Description of Likelihood
Rare	Will only occur in exceptional circumstances
Unlikely	Not likely to occur within the foreseeable future
Possible	May occur within the foreseeable future
Likely	Likely to occur within the foreseeable future
Almost certain	Almost certain to occur within the foreseeable future

3. Control the Risk

At all times, regardless of the level of risk, we are required to do what is reasonably practicable to eliminate or minimise the risk of any hazard with the potential to cause harm.

Control measures are the things we do to eliminate or lower the level of risk.

The types of control measures are categorised according to the **'hierarchy of control'**. Controls should be considered and used in this preferred order. Often, more than one control will be used in combination to minimise risk.

Hierarchy of Controls	
Most effective (High Level)	**Elimination:** remove the hazard completely from the activity
	**Substitution:** replace the hazard with a less dangerous one
	Redesign: change a machine or process to make it safer
	Isolation: Separate people from the source of the hazard
	Administration: putting rules, signage or training in place to make it safer
Least effective (Low level)	**Personal Protective Equipment (PPE):** Protective clothing and equipment

Higher level controls are considered more effective, and are therefore preferred, because they eliminate or reduce the risk of harm for everyone at all times. Lower level controls are less preferred because essentially the risk of harm still exists and they rely on people doing the right thing to provide an element of safety.

If lower level controls are to be implemented instead of higher level controls, it is important that the reasons behind the decision are explained.

Your assessed inherent risk level will determine the actions (such as documented planning) and controls required.

Assessed Risk Level	Description of Risk Level	Actions
Low	If an incident were to occur, there would be little likelihood that an injury would result	Undertake the activity with the existing controls in place
Medium	If an incident were to occur, there would be some change that an injury requiring First Aid would result	Additional controls may be needed
High	If an incident were to occur, it would be likely that an injury requiring medical treatment would result	Controls will need to be in place before the activity is undertaken
Extreme	If an incident were to occur, it would be likely a permanent, debilitating injury or death would result	Consider alternatives to doing the activity. Significant control measures will need to be implemented to ensure safety

4. Monitor and review

It is important to assess the effectiveness of the control measures you have implemented as the activity is being conducted and after the activity is completed. This step of the risk management process is often overlooked.

We don't always get things perfectly right the first time. If necessary, modify or add control measures to ensure safety. This will be required if new hazards or risks are identified, or if the existing controls are inadequate (say, for example, there was an incident that caused an injury, or even a near miss).

Record any changes to the safety measures in the Monitor and Review section of the documented risk assessment for further reference.