



SECTION	OVERSEAS STUDENTS				
ITEM:	Overseas Students Homestay Risk Management Strategy			ITEM No:	OSS-017
ISSUED:	2018			PAGES:	7
RESPONSIBILITY:	CLT and CRICOS Coordinator			VERSION:	2024.1
REVISED:		March 2024			
NEXT REVIEW:	2021	2027			

1. PURPOSE

The purpose of this strategy is to provide written processes to ensure that homestay service providers and homestay hosts for Brisbane Christian College comply with legislation applicable in Queensland about the care and protection of children 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 Brisbane Christian College to deliver a quality serviced to the young people in its care;
- reduce the risk of harm to homestay students through written policies and procedures, including information and training, for homestay providers and hosts involved with Brisbane Christian College.

2. SCOPE

This policy applies to homestay providers, homestay hosts, residents of homestay host homes, homestay students and visitors to homestay hosts' homes.

3. SOURCES

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Regulations 2011 \(Qld\)](#)
- [Child Protection Act 1999 \(Qld\)](#)
- [Education \(General Provisions\) Act 2006 \(Qld\)](#)
- [Education \(General Provisions\) Regulation 2006 \(Qld\)](#)
- [Education \(Accreditation of Non-State Schools\) Act 2017 \(Qld\)](#)
- [Education \(Accreditation of Non-State Schools\) Regulation 2001 \(Qld\)](#)
- [Education Services for Overseas Students \(ESOS\) Act 2000 \(Cth\)](#)
- [National Code of Practice for Providers of Education and Training to Overseas Students 2018 \(Cth\)](#)

4. DEFINITIONS

- **Guardian:** of a child means a person who is recognised in law as having all the duties, powers, responsibilities and authority relating to the child that, by law, parents have relating to their children.
- **Homestay Service Provider:** is the school, person or organisation arranging the homestay student's accommodation.
- **Homestay Host:** is the volunteer or paid family who cares for the homestay student in their home.

- **Homestay Student:** is the child or young person staying in the home of the homestay host.
- **Homestay:** is an arrangement for international students to live with local hosts/families during their studies at Brisbane Christian College.
- **Blue Card:** a Working with Children Check is a requirement for people who work or volunteer in child-related work. It involves a national criminal history check and review of findings of workplace misconduct.

5. POLICY

Statement of Commitment

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

The College will uphold the following principles under this strategy:

- The 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.
- Students under the care of Brisbane Christian College should be provided with the knowledge and information they require to feel empowered to take action in the event of abuse or neglect.
- The College acknowledges that homestay students are unique and valued individuals and deserve to be treated with care and respect.
- The College recognises that respect for homestay students is the foundation upon which all policies and procedures are developed. We are committed to promoting their wellbeing and to protecting the security, safety and wellbeing of homestay students under our protection.

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

5.1 **Visa condition 8532** requires that students under 18 years old maintain suitable accommodation, support and general welfare arrangements throughout the duration of study in Australia. At Brisbane Christian College this condition also applies to Homestay students over 18 during the duration of studies in the College (refer to *OSS-015 Accommodation and Welfare Policy*).

5.2 Code of Conduct

Brisbane Christian College's Homestay Code of Conduct is evidence of fulfilment of the requirements of section 3(1)(b) of the Regulations.

5.3 Selection and Training of Homestay Hosts

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

5.3.1 Selection

In choosing a homestay host the College must comply with any relevant legislation and satisfy itself of the ability of the homestay host to care for the student in a safe and secure environment, and to provide age appropriate

support and supervision for a child or adolescent attending the College and adjusting to living in a new environment.

All homestay hosts must agree to the Code of Conduct and the College's Child Protection Policy. The College's Homestay Handbook sets our clear criteria with regard to how it makes decisions about the suitability of a homestay situation. These criteria cover the minimum requirements with regard to:

- Blue Card Requirements - All homestay hosts must be holders of current Blue Cards issued by [Blue Card Services](#) . In addition, every person living with the homestay host who is 18 years or over must be in possession of a current Blue Card. The only exception is where the homestay host is a relative of the student.
- Facilities and Infrastructure (e.g. access to transport)
- Hygiene
- Cultural Awareness
- College and Homestay rules - including the College undertaking regular, on at least a six monthly basis, on-site visits to homestay hosts to view the accommodation offered.
- Services provided (e.g. meals, laundry)

All homestay families, and prospective families, are supplied with a copy of this Handbook.

In addition, the College selects Homestay families from the Church and College community, and those who usually have children who attend the College. All homestay hosts must provide the names and contact details of two referees, one preferably their Pastor, and these referees will be contacted to discuss the family's suitability to serve as homestay hosts. Hosts are selected with regard to the following guidelines:

- The homestay host must be an adult resident in Australia and must provide a stable family environment.
- An adult deemed suitable by the College must provide supervision equivalent to that provided by a parent.
- The family environment must be suitable for the age and gender of the student, and English should be the main language spoken in the home.
- The homestay family will be regular church attendees who will take the student to church with them.
- No more than two students are to be placed in one homestay. The number of students in a homestay should reflect the facilities available in the home. We do not normally place two students who speak the same language together.
- The accommodation and facilities provided by the homestay must meet the College's requirements for a safe and secure environment, and the College must be notified of any changes.
- No student will be placed with a homestay until the accommodation has been inspected and approved.

5.3.2 Induction

Brisbane Christian College values the work of homestay hosts and recognises its responsibility to offer support and assistance to ensure that homestay arrangements work well for all concerned. The 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 Conduct expected of staff. All members of the homestay family must be present during induction meetings.

The Induction process includes, but is not limited to:

- professional development about identifying and reporting harm or suspected harm;
- making staff aware of the risk management procedures for the protection of children; and
- working through policies related to child protection such as; Character Development, Anti-Bullying, Disability.

In addition, homestay induction includes providing information to homestay hosts about the aims of the homestay program responsibilities of hosts and of the homestay students; possible problems that may arise and possible solutions; legal issues; contact points for homestay hosts needing assistance or in an emergency; and cultural differences of which they should be aware.¹ On-going training and support is provided to homestay family during regular home visits and other contact with the Homestay Coordinator. The College will seek regular and frequent feedback (at least once per term) from both student and the homestay family to help ensure behaviour and facilities are of a high standard, and to address any concerns that may become an issue without being addressed early.

5.4 Child Protection Policy

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

In the case of a volunteer at Brisbane Christian College who provides any type of volunteer service to the College, including as a homestay host or service, and in accordance with the *Child Protection Act 1999*, if the volunteer is aware or reasonably suspects that harm has been caused to a child, the volunteer must report the harm to the College's Principal. The types of harm reported may include sexual abuse or likely sexual abuse, emotional or psychological abuse or neglect or sexual exploitation.

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

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

The Principal will then report and manage the volunteer's report under the College's Child Protection Policy and Child Risk Management Strategy. This commitment is evidence of Brisbane Christian College's fulfilment of the requirements of section 3(1)(d) of the Regulation.

5.5 Breaches

Breaches of this strategy are managed as follows:

- For domestic parties – via the College's usual Complaints Handling Policy.
- For international parties – via the College's Overseas Students Complaints and Appeals Policy and Procedures for international students and their families (CRISCOS registered schools).

The College's Overseas Students Complaints and Appeals Policy and Procedures is based on Part D Standard 8 of the *National Code of Practice for Providers of Education and Training to Overseas Students 2007*. The Policy and Procedures include reference to the [Overseas Student Ombudsman](#).

The Policy and Procedures are outlined below:

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

- Informal resolution
- Formal resolution
- Breaches are determined by the Homestay Coordinator in the first instance;
- Suspected breaches will be dealt with by investigation and reporting to relevant authorities where necessary (refer to the College’s Child Protection Policy);
- Penalties for breaches will be enforced in accordance with the College Code of Conduct. Penalties might include:
 - Pointing out to the homestay service provider or host that they are in breach of their agreement and therefore can no longer work with the College
 - Penalties might be more capacity building than punitive and may involve further training, conditions and controls to prevent harm
- An appeals process is specified within the College’s Overseas Students Complaints and Appeals Policy and Procedures.

5.6 Implementing and Reviewing the Overseas Students Homestay Child Risk Management Strategy

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

The introduction to this Overseas Students Homestay Risk Management Strategy and the “Compliance and Monitoring” section below state Brisbane Christian College’s commitment to reviewing the Strategy annually and are evidence of fulfilment of the requirements of section 3(1)(f)(i) of the Regulations relating to review.

5.7 Blue Cards

All homestay services providers and homestay hosts (including parents of the College, but excluding those who are relatives of the child staying with them) must have prescribed notices (Blue Cards) unless an exemption applies.

- All homestay hosts must have current Blue Cards where required by legislation.
- All adults who reside with the homestay provider must hold a blue card. Any student aged 18 years or over who is residing with a homestay provider who is also hosting a student aged under 18 years must also hold a blue card.
- The College maintains a register of all homestay hosts.
- The College maintains a register of all Blue Card numbers and the dates for renewal.

As of 31 August 2020, “No Card, No Start” blue card requirements apply for providers of child accommodation services, unless an exemption applies.

5.8 Risk Management

Brisbane Christian College has established a Risk Management Framework to identify risks to students of the College, including those who are accommodated in homestay arrangements. Staff who are involved in identifying risks are selected on the basis they are knowledgeable about the strategy, program, process or activity being reviewed, or they have ready access to experts in complex situations.

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

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

5.9 Communication and Support

5.9.1 Professional Development

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

In addition, Brisbane Christian 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 training for all Homestay Providers, Coordinators and Hosts;
- Enrolment package for families involved in the Homestay program; and
- Orientation / induction handbook for Students.

5.9.2 Communication

This Overseas Students Homestay Child Risk Management Strategy is publicised in the following manner in order to provide access to the Strategy to all stakeholders within the Homestay Program:

- Homestay Student and Parent Handbook, upon enrolment
- Homestay Host Handbook
- College HUB for general staff
- College Website
- Updates are communicated via HUB notifications and/or staff emails.

5.10 Responsibilities

Brisbane Christian College is responsible for developing and implementing this Overseas Students Homestay Risk Management Strategy and related policies and procedures to ensure it fulfils its obligations.

All homestay hosts at Brisbane Christian College are responsible for acting in compliance with this Overseas Students Homestay Risk Management Strategy and related policies and procedures.

5.11 Compliance and Monitoring

Brisbane Christian College is committed to the annual review of the Child Risk Management Strategy. The College will also record, monitor and report to the College Leadership Team, and others as appropriate, regarding any breaches of the strategy.

6. OTHER DOCUMENTS

- OSS-015 Overseas Students Accommodation and Welfare Policy
- OSS- 011 Overseas Students Complaints and Appeals Policy
- CPP-001 Child Protection Policy
- CPP-000 Child Risk Management Strategy
- ST-012 Student Anti-Bullying Policy
- G-002 Anti-discrimination Policy
- WHS-011 Sexual Harassment Policy

- G-001 Privacy Policy
- G-006 Complaints Handling Policy
- Homestay Code of Conduct
- Homestay Handbooks