

# Department of Education International

## Risk Management Strategy for Homestays and Short Term Cultural Exchanges



**Queensland**  
AUSTRALIA

endless opportunities

<b>Background</b> .....	<b>1</b>
<b>Purpose</b> .....	<b>2</b>
<b>Scope</b> .....	<b>2</b>
<b>Statement of Commitment</b> .....	<b>3</b>
<b>Code of Conduct</b> .....	<b>4</b>
<b>Homestay Recruitment, Screening and Training</b> .....	<b>6</b>
<b>Procedures for handling disclosures and suspicions of harm</b> .....	<b>6</b>
<b>Managing breaches of the Risk Management Strategy</b> .....	<b>8</b>
<b>Compliance with the Working with Children Act</b> .....	<b>9</b>
<b>Risk Management Plans for High Risk and Non-routine Activities</b> .....	<b>9</b>
<b>Strategies for Communication and Support</b> .....	<b>10</b>
<b>Related documents</b> .....	<b>10</b>
<b>Contacts</b> .....	<b>10</b>
<b>Review</b> .....	<b>11</b>

## Background

Education Queensland International (EQI) is the trading name for the commercial arm of the Department of Education's (DoE) international education services. EQI operates within Department of Education International (DEi).

EQI is registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) to provide courses to overseas students (students on a [student visa](#) as defined in the *Education Services for Overseas Students Regulation 2001*). Students [applying](#) for enrolment in, or who are already enrolled in an EQI high school program may request placement with an approved homestay provider.

EQI's [Study Tours](#) unit coordinates short-term group study tour programs for international students who wish to visit Queensland state schools to enrich their educational and cultural experiences. Study tours are for primary and high school students aged 10 to 18 years visiting Queensland on a tourist visa. Study tours may include school-arranged homestay.

The [International Services](#) unit of DEi is responsible for [short term cultural programs for students](#). These programs are often targeted at domestic students enrolled in Queensland state high schools studying a language other than English. The families of Queensland students who participate in the programs may be required to host an international student, as part of a reciprocal exchange arrangement.

Queensland state schools and DEi:

- recruit, assess, approve and engage appropriate homestay providers and hosts
- place overseas and international students ('students') in homestays and with hosts
- are responsible for the ongoing monitoring of homestay and host placements
- ensure appropriate arrangements for the student's accommodation and welfare are in place
- manage the exiting of homestay providers and hosts from the program, when required.

For the purposes of the *Working with Children (Risk Management and Screening) Act 2000* ('WWC Act') homestay providers and hosts are 'engaged in regulated employment'<sup>1</sup>. Each adult residing in the home is taken to be a volunteer 'engaged in regulated employment'<sup>2</sup>.

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

Each year DEi must develop a risk management strategy<sup>3</sup> ('strategy') about homestay providers and hosts that:

- implements practices and procedures regarding the engagement of homestay providers and hosts to promote the wellbeing of children and to protect the children from harm
- includes<sup>4</sup>
  - a statement of commitment to the safety and wellbeing of children and the protection of children from harm
  - a code of conduct for interacting with children
  - procedures for recruiting, selecting, training and managing homestay providers and hosts

---

<sup>1</sup> Some limited exceptions apply. Contact [Blue Card Services](#) for advice. DoE employees, please refer to the WWC Act Information Sheets for further information.

<sup>2</sup> Some limited exceptions apply. Contact [Blue Card Services](#) for advice. DoE employees, please refer to the WWC Act Information Sheets for further information.

<sup>3</sup> See s 171 WWC Act.

<sup>4</sup> See s 3 *Working with Children (Risk Management and Screening) Regulation 2011*.

- 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 providers and student exchange hosts (e.g. training).

## Purpose

The purpose of this strategy is to:

- comply with the WWC Act
- to assist Queensland state schools 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 homestay and short term cultural exchanges 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 providers and hosts
- to minimise the likelihood of harm to students living with homestay providers and hosts.

## Scope

This strategy applies to:

- all DoE staff
  - whose work involves the homestay program
  - involved in short term cultural programs organised through International Services
  - interacting with students who are, or are applying to be living with homestay providers and hosts
- homestay providers and hosts
- residents of and visitors to the homestay and host home
- students living with homestay providers and hosts.

## Statement of Commitment

DoE is committed to:

- the safety and wellbeing of children and the protection of children from harm
- providing safe and supportive learning environments
- responding when an employee or visitor of a Queensland state school reasonably suspects harm or a risk of harm to students<sup>5</sup>.

DoE will actively mitigate risks that it has the lowest tolerance for, including child and student safety<sup>6</sup>.

DEi is committed to ensuring the safety and wellbeing of all children and young people in our programs. DEi demonstrates this by:

- carefully selecting homestay providers and hosts
- matching students with compatible homestay providers/hosts
- ongoing monitoring of homestay/host arrangements, formally and informally
- making staff, homestay providers, 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

DEi respects international students as consumers and recognises that students living in a foreign country and away from their parents are particularly vulnerable. Consequently:

- students will be treated with respect
- students will be involved in decisions that affect them and will have their views considered
- the safety, wellbeing and best interests of the student are paramount.

---

<sup>5</sup> <http://ppr.det.qld.gov.au/education/community/Pages/Student-Protection.aspx>

<sup>6</sup> <https://det.qld.gov.au/det-publications/strategiesandplans/Documents/strategic-plan-2016-20.pdf>

## Code of Conduct

This Code of Conduct outlines the expected behaviours of all persons interacting with students in a homestay or exchange 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 providers and 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 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
- refer to the DoE [Student Protection guidelines](#) for information about 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 the school or the nominated program organiser for an International Services short term cultural program (students must not be subjected to verbal abuse or physical punishment)
- contact the 1800QSTUDY service, or the nominated program organiser for an International Services program, for immediate support outside school hours

- adhere to the [EQI incident management procedure](#).

### *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, even if they are aged over 18
- contact the school 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 (for study tours, contact the tour escort first, where possible)
- ensure appropriate care and supervision of a student who is sick or injured
- report all injuries and illnesses to the school, or for short term cultural programs report to the nominated International Services program organiser, as soon as practicable.

### *Transportation*

- permit safe travel arrangements, for example, in registered and roadworthy vehicles with appropriate insurance
- seek specific permission from the school and student's parent before allowing the student to travel in a vehicle operated by a provisional licence holder ("P-plates") or by a learner licence holder ("L-plates") (note: study tour students are not permitted to travel in a vehicle operated by a P-plate driver, unless the P-plate holder is 25 years of age and above)
- ensure use of public transport is safe and age appropriate (with appropriate arrangements to and from the bus stop/train station etc.)
- ensure study tour students are accompanied to and from school and for all other travel.

### *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 provider/host knows where they are and can contact them at all times
- respect the privacy of your homestay/host 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/host 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
- do not do anything that may bring their Queensland school or the international student program into disrepute
- contact the 1800QSTUDY service, or the nominated program organiser for an International Services program, for immediate support outside school hours
- adhere to the [EQI incident management procedure](#).

#### DoE staff

- must comply with
  - the [Code of Conduct for the Queensland public service](#)
  - the DoE [Standard of Practice](#)
  - Queensland government policies, procedures and directives
  - DoE policies and procedures (see the [Policy and Procedure Register](#))
  - the law.

## Homestay Recruitment, Screening and Training

EQI's relevant policies and procedures for the EQI homestay program are available at: [www.eqi.com.au](http://www.eqi.com.au).

EQI's relevant procedures for the Study Tours program are available from EQI Study Tours (please email [eqistudytours@qed.qld.gov.au](mailto:eqistudytours@qed.qld.gov.au) to request a copy).

The relevant procedures for short term cultural exchanges are available from International Services (please email [internationalservices@qed.qld.gov.au](mailto:internationalservices@qed.qld.gov.au) to request a copy).

## 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*.

**DoE employees:** follow the [Student Protection](#) procedure and comply with mandatory reporting obligations. For allegations against employees, follow the [Allegations against employees in the area of student protection](#) procedure.

**Homestay providers:** inform the school (international student coordinator or school principal) and the police and/or [Child Safety Services](#), where relevant.

**Hosts:** notify the nominated program organiser and the police and/or [Child Safety Services](#), where relevant.

**Students:** inform your 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 (and includes self-harm). 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.communities.qld.gov.au/childsafety/protecting-children/what-is-child-abuse/signs-of-child-abuse-and-neglect>.

## DoE staff managing and recording a disclosure of harm

Reporting requirements and supporting resources are available at:

<https://intranet.qed.qld.gov.au/Students/studentprotection/Pages/default.aspx>.

The following is a summary of information available at:

<https://intranet.qed.qld.gov.au/Students/studentprotection/Documents/questioning-students-faqs.docx>.

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 providers and 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.

Homestay providers 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.

Hosts report to the nominated program organiser and to the Queensland Police Service or Child Safety Services, where appropriate.

DoE employees follow DoE procedures and comply with mandatory reporting obligations.

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?

Breaches will generally be managed by the school principal in the first instance. If the principal is alleged to have committed the breach, the principal's supervisor will manage the breach.

For information about how to make a complaint against a department employee, please see: <https://intranet.qed.qld.gov.au/Services/strategymanagement/Ethicalstandards/Pages/Howtomakeacomplaint.aspx>.

### Breach by homestay providers and hosts

Breaches will be managed under the following procedures:

- Ongoing monitoring of homestay providers and placements – EQI
- Ongoing monitoring of homestay providers and placements – EQI Study Tours
- Ongoing monitoring of hosts and placements – International Services, DEi

Breach may result in:

- removal of the student from your residence

- termination of your participation in the homestay/host program, including any reciprocal international exchange
- reports to the police or Child Safety Services, if warranted.

## Students

Breach may result in:

- school discipline
- removal from the homestay/host home
- cancelling your participation in the homestay or exchange program including any reciprocal hosting of a Queensland student
- suspension or cancellation of enrolment (for study tours this means removal from the school program).

## DoE staff

Employee breaches of this strategy will be managed in accordance with processes associated with breaches of the [Code of Conduct for the Queensland public service](#) and the [Standard of Practice](#).

## Others

Breach by a visitor, volunteer or other person will be managed by the school principal and the action taken will depend on the circumstances of the breach.

## Compliance with the Working with Children Act

Blue card requirements for homestay providers and hosts are outlined in our policies and procedures, as follows:

- policies and procedures for the EQI homestay program, available at: [www.eqi.com.au](http://www.eqi.com.au)
- procedures for the Study Tours program (please email [eqistudytours@qed.qld.gov.au](mailto:eqistudytours@qed.qld.gov.au) to request a copy)
- procedures for short term cultural exchanges (please email [internationalservices@qed.qld.gov.au](mailto:internationalservices@qed.qld.gov.au) to request a copy).

For further information about blue card requirements and processes refer to the Queensland Government [Blue Card Services website](#).

## Risk Management Plans for High Risk and Non-routine Activities

Students must not undertake high risk activities unless the activities are approved by EQI and/or school staff. "High-risk activities" include any activity which inherently poses an increased risk of harm, illness or injury. Examples of high-risk activities are extreme sports and recreational activities with dangerous elements.

DoE's [Enterprise Risk Management Framework](#) is a comprehensive approach to identifying, assessing and treating risk based on the department's risk appetite within the context of our risk environment. EQI and school staff must consider this risk management framework when developing and completing the DoE risk management plan for travel and activities involving international students.

EQI and school staff must complete a risk management plan for non-routine activities. Non-routine activities includes: overnight travel away from the homestay provider's residence (with or without your homestay provider); activities where the sports, leisure and recreation provider requests parental consent; or activities that require supervision other than the homestay provider.

To assist in mitigating the risk of travel and activities not arranged by the school, EQI maintains the register of approved Sport, Leisure and Recreation Providers (SLR Providers). SLR Providers on this register are assessed by schools and approved by the Director, International Student Programs (ISP). EQI will determine if the SLR Provider is considered a routine or non-routine activity. Schools are responsible for making students and homestay providers aware of which SLR Providers are currently approved by EQI.

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

## Strategies for Communication and Support

This strategy is available on the EQI website at: [www.eqi.com.au](http://www.eqi.com.au).

Students, parents and education agents are advised to access this strategy electronically, on the EQI website.

Homestay providers and hosts are given a copy of this strategy when they are engaged by a school. Information about this strategy is provided during orientation for homestay providers and hosts.

DoE staff are provided with regular training, including information about this strategy, throughout each school year. Newsletters and emails are used to inform staff about updates to the strategy.

## Related documents

This strategy should be read in conjunction with:

- any contract between the State and the homestay provider/host
- [Code of Conduct for the Queensland public service](#)
- DoE [Standard of Practice](#)
- [Student Protection procedure](#)
- [Student Protection guidelines](#) (DoE employees only)
- [Working with Children \(Risk Management and Screening\) Act 2000](#)
- [Working with Children \(Risk Management and Screening\) Regulation 2011](#)
- [Working With Children Check - Blue Cards](#)
- [EQI International Student Travel and activities request form](#)
- EQI [Critical Incident](#) procedure.

## Contacts

International Student Programs

Telephone: 1800 316 540

Email: [EQInternational@qed.qld.gov.au](mailto:EQInternational@qed.qld.gov.au)

International Services, DEi

Telephone: (07) 3513 5756

Email: [internationalservices@qed.qld.gov.au](mailto:internationalservices@qed.qld.gov.au)

EQI Study Tours

E-mail: [egistudytours@qed.qld.gov.au](mailto:egistudytours@qed.qld.gov.au)

## Review

Regular reviews will:

- incorporate feedback from stakeholders
- check the strategy reflects current legislation and current DoE 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.