



International Student Services
Homestay and Under 18 Supervision Program
Risk Management Strategy:
International Students under 18 years of age

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Description	This risk management strategy provides the guidelines, policies and procedures, and practices to manage all young people under the age of 18 registered in QUT Homestay and Under 18's Supervision Program coordinated by International Student Services (QUT).

Contents

1. Introduction
2. Definitions
3. Statement of Commitment
4. Code of Conduct for Interacting with Under 18's
5. Recruitment, selection, training and management procedures for staff
6. Reporting guidelines and directions for handling risks, disclosures and suspicions of harm
7. Managing breaches of risk management strategy
8. Risk Management Plans for Activities
9. Strategies for Communication and Support
10. Evaluation

1. Introduction

This Risk Management strategy consists of guidelines, policies and procedures, and practices designed to manage all international students under the age of 18 registered in QUT's Homestay program and the Under18's Supervision Program coordinated by International Student Services (QUT).

The policies and procedures, and practices guiding this Risk Management strategy incorporates industry standards, legislation and requirements that strive for best practice in supporting international students under 18 years of age.

2. Definitions

"Staff" refers to all QUT International Student Services staff - paid and unpaid, including but not limited to office staff, educators, and volunteers.

"ISS Director" refers to the Director of International Student Services

"Program Coordinator" refers to nominated (by ISS Director) staff member of ISS coordinating the Under 18's Supervision Program.

"Guidance officer" refers to the nominated staff member of ISS providing general welfare and support to international students under 18 years of age.

"Homestay program" refers to QUT Homestay program coordinated by International Student Services

"Homestay officer" refers to the ISS staff member coordinating the QUT Homestay office

"Homestay host" refers to the person/s providing the homestay.

"U18SP" refers to the Under 18 Supervision Program

"Parents" refers to the parent/legal guardian of the under 18 international student/s

"Student" refers to international students under the age of 18 registered in the U18SP.

"Home Affairs" refers to Department of Home Affairs.

"MOPP" Manual of Policy and Procedures.

"Blue card" refers to the [blue card system](#)

3. Statement of Commitment

3.1. QUT Homestay and the Under 18 Supervision Program is committed to providing welfare arrangements for the student's accommodation, support and general welfare in accordance with Home Affairs and ESOS Act (National Code) standards and requirements.

3.2. QUT is committed to industry standards and legislation noted in;

- [ESOS Act 2000 and recent Amendments to the Act](#)
- [ESOS National Code 2017](#)
- [Home Affairs Under 18 requirements](#)
- [Blue card system](#)

3.3. QUT Homestay and the Under 18 Supervision Program is committed to ensuring the safety and wellbeing of all under 18 international students registered in the U18SP and will endeavour to

provide a safe environment so the student can successfully pursue their academic and personal development.

3.4. The following values reflects the culture of the program;

- All international students under 18 years of age 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 (with parental/guardian consent)

4. Code of Conduct for Interacting with Under 18's

4.1. Staff - it is expected that all staff who are involved with the program will abide by;

4.1.1. The standards outlined in [QUT's Code of Conduct](#).

4.1.2. [Blue Card system](#) and its policy and procedures for working with young children.

4.1.3. Any other organisational requirements as set out by ISS Director.

4.2. Students - it is expected that all students registered in the QUT Homestay and U18SP program will abide by;

4.2.1. The standards outlined in [QUT's Student code of conduct](#).

4.2.2. Homestay and U18SP student guidelines (refer to [Appendix 1](#)).

4.2.3. Program attendance register - the U18SP is required to maintain an attendance register for all international students in the program. Attendance checks are contact sessions between the U18SP office and the student to monitor the general welfare of the student. A record of attendance is completed at the start of each contact session. Students who are marked absent will require follow-up.

4.3. Homestay host/s - it is expected that all homestay host/s registered in the QUT Homestay program will abide by;

4.3.1. [QUT Homestay Code of Ethics and Guidelines for Providers](#)

4.3.2. [QUT Homestay information on interacting with students – under 18's presenting challenging behaviours will be referred to the Guidance officer for advice to access counselling](#)

4.3.3. [Blue Card system](#) and its policy and procedures for working with young children

4.3.4. Any other organisational requirements as set out by ISS Director such as;

4.3.5. The Homestay Student will not be:

- provided with any illegal substance or substance that is not made available to under 18s' for example; alcohol, cigarettes, or drugs
- subjected to inappropriate language, comments, or behaviour
- subjected to any sexually suggestive comments, materials and behaviour – including any physical or emotional advances to form a relationship of a sexual nature

4.4. Interaction of Under 18s with those aged 18 or over

4.4.1. QUT staff abides by the Blue Card system checks and processes. The University enrolls both students under the age of 18 and over.

4.4.2. Where possible, a program staff member will monitor the interactions of under 18's with those aged 18 or over, during all approved activities to ensure the safety and wellbeing of the student under 18.

4.4.3. Under 18 students will only be placed with homestay host/s accommodating other under 18 students, unless the other residents over the age of 18 have a current Blue Card linked to QUT Homestay.

4.5. Video and Photography

- 4.5.1. Managing the use of images for any form of publications for students under 18 will be subject to the [good practice guidelines](#) set out by Child Family Community Australia (CFCA) and QUT's policy and procedures governing the use of material containing images of under 18 students.
- 4.5.2. This involves gaining the consent of the child or young person and their parent (or guardian) prior to recording or producing images of children or the subsequent display or distribution of that photo or visual material.
- 4.5.3. Permissions to record and produce material involving international students under 18 are documented via the [QUT Consent form](#) and filed appropriately in the program folder.

4.6. Health, well-being and safety

- 4.6.1. Program staff and students are required to comply with QUT's standards for health, well-being and safety. The following information is provided to assist with student health, well-being and safety.

4.6.2. On campus

- [QUT Security for emergencies](#)
- [QUT Fire Evacuation procedures](#)
- [Workplace Health and Safety policy and procedures \(staff access only\)](#)
- [QUT Medical Centres \(GP and KG\)](#) for medical issues
- [University drug and alcohol policy](#)
- [International Student Services](#) – support, accommodation, homestay

4.6.3. Off campus

- Contact 000 for Emergency related to Fire, Police or Ambulance
- After hours contact 3138 2019 for international students
- [Personal safety](#) and [transportation](#)
- [Technology and online safety](#)

4.6.4 Duty of care

- Under 18 student cannot be left alone or unattended overnight. Homestay host is required to contact the Homestay officer to arrange a suitable plan to ensure the health and safety of the U18 student is met. This may include a temporary relocation of the U18 student to a current QUT approved homestay.
- Upon successful placement of the student, the Homestay officer or nominated QUT representative will accompany the U18 student until the arrival and/or collection of the student by the homestay host.
- Under 18 students that present intoxicated or impacted by drugs will be referred to the Guidance officer for referral to appropriate support services such as medical and counselling. In the event this presentation triggers a homestay placement breakdown, the U18 student will be relocated to another QUT approved homestay.

4.6.5 Physical contact guidelines

- Staff, homestay host/s and residents of home will not initiate, permit or request inappropriate or unnecessary physical contact with U18 student (e.g., massage, kisses, hugging, tickling and wrestling games) or facilitate situations that unnecessarily result in close physical contact with an U18 student.
- Staff, homestay host/s and guest/s shall respect the privacy of the U18 student and not be in the same bedroom or enclosed areas as the U18 student to avoid a breach of personal and professional boundaries.

- If there is a breach of personal and/or professional boundaries, any person can follow the reporting guideline noted in 6.1 of this document.
- Staff are not permitted to maintain social or business relationships with U18 student outside of the service environment.

4.6.6 Gifts

- Gift exchanges between U18 students and homestay host/s are permitted for the purpose of special occasions such as birthdays and Christmas. There is no expectation from either party that this is a required/expected practice.
- If a gift is given, there is no requirement/expectation for the gift to be of a certain value.

5. Recruitment, selection, training and management procedures for staff

5.1. [QUT's organisational recruitment process](#) will determine recruitment and selection of suitable staff related to the position.

5.2. New staff will undergo [QUT's induction and orientation training](#).

5.3. In addition to the recruitment process, all new and existing staff involved in QUT Homestay and supervision program will;

5.3.1. be required to comply with [Blue Card system](#) checks and processes and hold a current blue card

5.3.2. be familiar with [QUT's ESOS information \(staff access only\)](#) for staff

5.3.3. be trained and qualified in their specialised areas such as;

- Counsellors and welfare advisers (Social Work or Psychology degree required)
- U18 Guidance officer and Homestay officer

5.3.4. be familiar with the Risk Management Strategy for QUT Homestay and U18 Supervision Program

5.3.5. be familiar with ISS Critical Incidents procedures (refer to [Appendix 2](#))

5.3.6. All staff involved in program will be familiar with;

- [ESOS Act 2000 and recent Amendments to the Act and ESOS National Code](#)
- [Home Affairs Under 18 requirements](#)
- [QUT Student Grievance](#) policy (via Student Ombudsman)

5.4. Recruitment of homestay host

5.4.1. Homestay hosts are required to complete and submit an [online application](#).

5.4.2. To be registered and approved to host students with QUT Homestay, a homestay host will;

- Complete a homestay interview process and complete a house inspection
- Sign and commit to the Homestay Host Agreement
- Be familiar with the Risk Management Strategy for QUT Homestay and U18 Supervision Program
- Maintain a valid Blue card and be familiar with Blue card system – [Homestay provider information sheet](#)
- Attend any training set out by the university

6. Reporting guidelines and directions for handling risks, disclosures and suspicions of harm

6.1. Reporting guidelines:

6.1.1. Staff - all program staff to report directly to the Program Coordinator for consultation on incidents or matters related to the under 18 student.

- If the Program Coordinator is not available, staff will need to contact Director, ISS.

6.1.2. Students – students can report an incident by contacting the Homestay officer and/or U18 Guidance Officer.

- Contact details are provided to students as noted in the Homestay and U18SP student guidelines (refer to [Appendix 1](#)). This information is provided to students during orientation and induction.

6.1.3. Homestay host/s – homestay host/s can report an incident by contacting the Homestay officer and/or U18 Guidance Officer.

- Contact details are provided as noted in the Homestay and U18SP student guidelines. This information is provided to homestay host/s during induction, orientation and training.

6.1.4. Others – any person can report an incident to the following contacts;

- Triple 000 if you believe child is in immediate danger of life-threatening situation
- Child Safety Centres – 07 3037 0000 (Fortitude Valley) or [Brisbane region offices](#)
- After hours - 07 3235 9999 or freecall 1800 177 135 (Queensland only)

6.2. What is “harm”?

6.2.1. Harm is defined as “any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing”

6.2.2. Harm can be caused by physical, psychological, or emotional abuse or neglect; or sexual abuse or exploitation.

6.3. Type of harm

Type	Examples	Indicators of abuse and neglect (<i>examples</i>)
<i>Physical</i>	<ul style="list-style-type: none"> • <i>Hitting, providing any inappropriate substances such as poisons, alcohol, illegal drugs or medication</i> • <i>Domestic and family violence</i> 	<ul style="list-style-type: none"> • <i>showing wariness and distrust of adults,</i> • <i>low self-esteem, withdrawn</i> • <i>abusing alcohol or drugs</i> • <i>being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable</i> • <i>feeling suicidal or attempting suicide</i> • <i>being reluctant to go home</i> • <i>malnutrition, poor hygiene, matted hair, dirty skin or body odour</i> • <i>unattended physical or medical problems</i> • <i>comments from a child that no one is home to provide care</i> • <i>being constantly tired</i> • <i>frequent lateness or absence from school</i> • <i>being left unsupervised for long periods.</i> • <i>fear of going home</i>
<i>Psychological or Emotional</i>	<i>Verbal insults, hostility, bullying, cultural affront,</i>	
<i>Neglect</i>	<i>Not providing sufficient food, housing and hygienic living conditions</i>	
<i>Sexual/exploitation</i>	<ul style="list-style-type: none"> • <i>In appropriate touching, kissing or holding a sexual manner</i> • <i>Exposing a sexual body part to a child</i> • <i>Exposing children to sexual acts or pornography</i> • <i>Making obscene phone calls or remarks to a child</i> 	

6.4. Assessing harm

1. Gather information;

- Facts
 - a) gather information from student, homestay host/s and other parties,
 - b) record and document alleged harm, risk of harm, student's details, family context, social and cultural factors
 - c) Who, what, when, where
- History – has this occurred in the past?
- Risk factors – identify features that may heighten risk or risk of harm (environment, person/s, interactions)
- Protective factors – identify features that may decrease risk or risk of harm (environment, person/s, interactions)

2. Assess harm and risk of harm;

- Assess immediate safety – is the student in immediate danger, needs removing and be placed elsewhere?
- Gather evidence to determine decision if student needs to be placed elsewhere – severity of harm or risk of harm, probability and vulnerability
- How likely will this occur again?

3. Decide on response – depending on staff assessment, a decision needs to be made on whether the student needs to be moved to another homestay

- Decide on outcome - if student is moved, consult with ISS, Director and determine action for reporting. Once a student is moved from the homestay, no other students will be placed in the homestay regardless of whether there is a Blue card investigation or not
4. Review - if it is determined that the student is safe to stay on, monitoring of the homestay placement will be done on a case-by-case scenario.

6.5. Managing and recording a disclosure or suspicion of harm

Any disclosure of harm must be documented in the first instance. Staff should;

- remain calm and listen attentively, actively and non-judgementally
- ensure there is a private place to talk
- encourage the person 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')
- Ensure the person is advised that the disclosure cannot remain a secret and it is necessary to tell someone in order to get help
- reassure the person they have done the right thing by telling you
- advise the child that you need to tell someone else who can help the child (counsellor)
- 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, and
- follow any relevant process for reporting a disclosure of harm and consider whether there are requirements to report matters to the Queensland Police Service or Child Safety
- If there are suspicions of harm or concern for a child's welfare, staff should;
 - remain alert to any warning signs or indicators
 - pay close attention to changes in the student's behaviour, ideas, feelings and the words they use
 - make written notes of observations in a non-judgemental and accurate manner
 - assure the student that they can come to talk when they need to, and listen to them and believe them
 - when they do, and follow any relevant process for reporting a suspicion of harm and consider whether there are requirements to report matters to the Queensland Police Service or Child Safety, or consider what support services could be offered if the concern does not meet the relevant reporting process

6.6. Handling risks, disclosures and suspicions of harm

- a) Risks, disclosures or suspicions of harm involving a student should be reported to the Guidance officer and/or Homestay officer in the first instance available.
- b) The Guidance officer and/or Homestay officer will then report to the U18SP program coordinator, who in turn will escalate the report to ISS Director for consultation. ISS, Director will report to the relevant management up-line should it require further attention
- c) If the incident is considered serious, the staff member is encouraged to firstly, act to ensure the young person's safety and wellbeing and secondly, record in writing details of the incident at the earliest opportunity.
- d) The staff member must notify the Program Coordinator (or ISS Director if Program Coordinator is not available) at the earliest opportunity following the incident and deliver the written details.
- e) Depending on the outcome of the assessment for harm or risk of harm, the incident/matter may be referred to Police, legal aid or other ISS/QUT staff for follow-up. ISS Director will action any [mandatory reporting](#) in accordance with QLD child safety requirements.

7. Managing breaches of risk management strategy

7.1. A breach is any action or inaction deemed contrary to the policies referred to within this strategy.

7.2. This can involve;

- any staff member of the organisation

- student's placed in QUT Homestay and registered in the U18SP
- or, homestay host/s

7.3. An Incident Report form (refer to [Appendix 3](#)) is used to document any breach.

7.4. Type of breach and control mechanisms

<i>Breach</i>	<i>Control</i>	<i>Who is responsible?</i>
Staff code of conduct	In accordance with QUT MOPP	ISS Director and if required, QUT HR
Student code of conduct	In accordance with QUT MOPP	ISS Director and if required, Registrar's Office
Homestay student - Homestay and U18SP student guide lines	<ul style="list-style-type: none"> • Provide closer supervision, emphasising relevant section of Homestay and U18SP student guide lines, providing further education, mediating between those involved in the incident • Place student into other approved homestay if deemed appropriate 	Homestay officer and if required, U18SP Guidance Officer Approval by Program Coordinator or ISS Director
Homestay host/s code of ethics and guidelines	<ul style="list-style-type: none"> • Providing further education and training, mediating between those involved in the incident • Termination of homestay provider arrangement if breach contravenes Blue card system or if breach is determined serious enough to warrant termination of provider arrangements 	Homestay officer and if required, U18SP Guidance Officer for welfare, health and safety. ISS Director
Not having a current Blue Card	Providing further education and training	Homestay office
Placing student with homestay host/s without verified Blue card number	<ul style="list-style-type: none"> • Emphasising the relevant component of Blue card requirements • Removal of student from homestay and placing student with verified Blue card homestay host/s, check other residents 	Homestay office
Student Visa	<ul style="list-style-type: none"> • Home Affairs requirements • QUT Compliance • CAAW 	QUT Compliance and U18 Guidance officer
Participating in activities not approved by U18SP	Provide closer supervision, providing further education, mediating between those involved in the incident	U18SP Guidance Officer
Blue Card requirements	<ul style="list-style-type: none"> • Blue Card processes 	Blue Card Services

8. Risk Management Plan for Activities

8.1. From time to time, students placed in homestay may request to participate in different types of activities. Requests to participate in activities outside of homestay arrangements and classrooms are managed by the U18SP office (Guidance officer or nominated QUT staff). Students are required to make a request by completing an Activity Permission slip (refer to [Appendix 4](#)) which is completed by the student and approved by the parent/guardian and U18SP office.

8.2. Students participating in approved activities will need to obtain a risk management plan for the activity from the organising body/person and provide this document to the U18SP office prior to the request being approved. The Activity Permission slip is filed in U18SP records management system along with associated documentation.

8.3. To determine the risk of the activity, the U18SP office will assess the risk of activity by completing an U18 Risk Management Plan for High Risk Activity (refer to [Appendix 5](#)). There are six steps to consider when assessing the activity;

1. Describe the activity

- What is the activity?

- What is the purpose of the activity?
- What are your objectives in undertaking the activity?
- What are the elements of the activity from start to finish?
- Where is the activity taking place?
- What environmental factors need to be considered?
- Who is involved in the activity? Parents? Staff? Children? People external to the organisation?

2. Identify the risks

- Consider - how might a child be harmed?
- Where or when might harm occur?
- How might harm occur?
- Why might harm occur?

3. Analyse the risks

The purpose of risk evaluation is to make decisions, based on the outcomes of risk analysis. The level of risk will determine whether the high risk activity or special event is practical.

a) How likely is it that the harm will occur? (likelihood)

Likelihood	<i>Almost certain</i>	Almost certain to occur in most circumstances
	<i>Likely</i>	Likely to occur frequently
	<i>Possible</i>	Possible and likely to occur at some time
	<i>Unlikely</i>	Unlikely to occur but could happen
	<i>Rare</i>	May occur but only in rare and exceptional circumstances

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b) What would happen if the harm did occur? (consequence)

Consequence	<i>Critical</i>	- Critical incident (e.g. Death or permanent disability of adult or child; high level of distress to other parties). - Sustained negative publicity or damage to reputation from a national perspective or from the community welfare perspective
	<i>Major</i>	- Multiple injuries requiring specialist medical treatment or hospitalisation; and/or major occupational health safety & welfare liability incident / issue. - Major incident which damages public or parent confidence. - One or more children are lost from the main group.
	<i>Moderate</i>	- Serious injuries and/or illness. - Complex welfare and/or health care issue. - Serious disruption or incident, resulting in distress to children and adults.
	<i>Minor</i>	- Minor first aid or minor occupational health safety & welfare liability incident / issue (e.g. minor cuts, bruises, bumps). - Minor behavioural issues.
	<i>Insignificant</i>	- No treatment required

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4. Evaluate the risks

The fourth step requires you to evaluate the level of risk, which will depend on your answers to the questions asked at Step 3. For example, if a risk is likely to occur and the consequences could result in major harm to a child, then this would be considered high risk.

Below is an example of a risk analysis matrix for analysing and evaluating risks in organisational activities. To determine the *likelihood* of risk using this matrix, refer to the left hand column of the risk analysis matrix. Then use the impact information to determine the level of *consequence*. Finally, combine the *consequence* and *likelihood* rating to arrive at the risk level.

		Likelihood				
		Rare	Unlikely	Possible	Likely	Almost Certain
Consequence	Critical	Moderate	High	High	Extreme	Extreme
	Major	Moderate	Moderate	High	High	Extreme
	Moderate	Low	Moderate	Moderate	High	High
	Minor	Low	Low	Moderate	Moderate	Moderate
	Insignificant	Low	Low	Low	Moderate	Moderate

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5. Manage the risks

What controls and responsibilities can be useful when considering the values and perceptions of the organisation?

What are the risk management options that needs to be considered?

6. Review - ongoing review is required to ensure that the risk management plan for high risk activity or special event is effective. Reviewing controls and responsibilities can be useful and effective for future planning. Good practice - review the risk management plan after the event or activity.

9. Strategies for Communication and Support

9.1. Communication

9.1.1. Students – communication and contact with students registered in the Supervision Program will be made with either one or more of the following via;

- Homestay and U18SP Orientation
- School orientation
- Home visits
- Telephone calls and SMS text to students and hosts
- Email contact with students and host
- Attendance register

9.1.2. Homestay host/s – communication and contact with homestay host/s registered with QUT Homestay will be made with either one or more of the following;

- Homestay host/s orientation interview
- Newsletter
- Postal mail
- Telephone, email or SMS text
- QUT Homestay training

9.1.3.1 Social media and mobile phones

- Staff, homestay host/s and U18 students are permitted to use social media platforms and mobile phones for the purpose of the welfare and care arrangements of the U18 student.

9.2. Support

9.2.1. Students and Homestay host/s - support services provided by International Student Services including;

- Counselling and welfare
- Adjustment and settlement support
- General advice
- After hours contact - Ph: 3138 2019

9.2.2. Staff needing support can seek assistance from;

- Relevant supervisors,
- QUT Human Resources and QUT Wellness (Health, Safety and Environment)
- QUT EAP (Employee Assistance Program) – 1800 808 374

9.2.3. Grievance procedures will be managed via [QUT Grievance procedures](#)

It is important to create multiple access points for the staff, student and homestay host/s to seek appropriate support and assistance.

Access points for assistance include contacting;

- International Student Services – issadvice@qut.edu.au (Ph: 3138 3963)
- QUT Homestay - isshomestay@qut.edu.au (Ph: 3138 3963)
- QUT Accommodation - accommodation@qut.edu.au (Ph: 3138 1596)
- Under 18 Supervision Program - u18sp@qut.edu.au (Ph: 3138 3963)

Informal

- Contact U18 Guidance Officer for any related matters, contact details provided to student at orientation
- Contact Homestay Officer for Homestay related matters, contact details provided to student and homestay host at orientations
- In the event of a conflict of interest, referrals should be made to the ISS Director to determine the appropriate actions to resolve matters

Formal

- [Student Ombudsman](#)
<https://www.ombudsman.qld.gov.au/>

10. Evaluation

10.1. Evaluation of the program will be done via;

- Annual self-assessment and review by ISS Director and/or nominated person/s
- QUT staff involved with program
- Surveys and evaluations as deemed suitable by Director, ISS

Review of this Risk Management Strategy will be required annually.

Version 1 completed on 18/10/2019 and approved on 20/10/2019