

JAN 2020

# RISK MANAGEMENT STRATEGY



# CHILD PROTECTION POLICY

## PURPOSE

- To prevent foreseeable harm to children and young people in EdVenture Consulting's care
- To provide a framework for homestay and short-term study tours to ensure that students are well supported and cared for both at school and in their homestay'
- To promote the safety and well-being of students living with homestay providers and hosts.
- To ensure that all staff and volunteers who work within EdVenture Consulting are assessed for their suitability to work with children under the jurisdiction of the relevant Government departments. In Queensland: Department of Justice & Attorney General - regulated by the "Working with Children (Risk Management and Screening) Act 2000" (where exemptions do not apply), in Victoria: Dept of Justice & Community Safety - regulated by the "Working with Children Act 2005"
- To ensure that all people involved with the operations of EdVenture Consulting are aware of their responsibilities in relation to the above
- To contribute to the development and wellbeing of children and young people through the educational programs provided by EdVenture Consulting.

## POLICY

EdVenture Consulting will aim to ensure that the safety of each child participating in any program through the company is paramount. An ongoing effort to ensure that all parties involved in EdVenture Consulting programs meet the guidelines outlined and are also monitored regularly will be an integral part of our policy.

The student's personal safety will always take priority over any other elements/components of the program. **Each student** will also be offered advice and/or instructions to ensure their own safety and will be guided to do so by adults responsible for their supervision.

### Who Must Comply with this Policy?

- Staff, Host Families (both residents and visitors) and other volunteers
- Visiting teachers and tour guides
- Students living with homestay families

## STATEMENT OF COMMITMENT

EdVenture Consulting is committed to the safety and wellbeing of all children and young people participating in all our programs. Our aim is to assist in improving the English communication skills and cultural understanding of students through our core values of diversity, cross cultural teaching, educational excellence and public engagement. All stakeholders will treat students with respect and address their concerns. Students will be involved in decisions which affect them and have their views considered. EdVenture Consulting will continually endeavour to provide a safe and supportive learning environment for children and young people through:

- Careful staff and host family selection and ensuring those parties are committed to working with children and young people.
- Ensuring staff and families are provided with ongoing training and information to ensure safety and wellbeing of all children and young people, and are also able to communicate this to the participants as required
- Ensuring that staff/families communicate any concerns about the safety of participants in a clear and timely manner
- Taking appropriation action when there has been a breach of legislation, this strategy or a policy/procedure
- Ensuring that all activities and suppliers of services are selected to meet EdVenture Consulting priorities for participants.
- Offering 24/7 support to participants and host families
- Ongoing monitoring of staff, host families and service providers
- Ensuring all staff, host families and service providers are aware of relevant legislation, this strategy and policies as well as emergency procedures and reporting processes

## CODES OF CONDUCT

All persons participating in EdVenture Consulting programs should act in a way that would be considered appropriate when viewed by a third party, and 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.
- homestay students should not be alone with another person (for example, a younger child) in a bedroom or bathroom.

**The following behaviours are considered unacceptable by EdVenture Consulting:**

- The use of abusive, derogatory or offensive language e.g. swearing, derogatory terms, sexual jokes and innuendo
- Excessive consumption of alcohol during the tour and whilst responsible for the care of students in your charge.
- Domestic and family violence
- Inappropriate comments or behaviour related to a person's race, religion, disability, gender or sexuality including suggestive or racist comments or jokes.

## Students

Students are expected to comply with EdVenture rules which are covered in a bilingual Orientation, outlining expected behaviour during the Study Tour. These rules (in both English and native language) are included in Student Workbook.

- respect the household rules, household property and residents of the home
- show consideration and courtesy to all residents of the home
- respect the privacy of your homestay/host family, for example:
  - a. ask permission before taking photographs or making video recordings of the residents of the home (persons must be appropriately clothed)
  - b. ask before posting any information about the family or the home on social media
  - c. be respectful in any social media posts or public comments
- abide by EdVenture's rules regarding appropriate use of technology and Social Media (*Student Handbook*)
- treat others with respect and courtesy
- be honest and open with EdVenture staff/host family if there is a problem
- 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

## Homestay providers and hosts

Host families are expected to comply with EdVenture rules and expectations covered in prearrival Orientation, *Host Family Handbook and signed Letter of Agreement*. Host Families will:

- Maintain an appropriate relationship with the student. Homestay hosts must not have a romantic or sexual relationship with a student.
- Understand that there are differences in what is perceived to be 'appropriate' due to age, maturity and cultural background
- When physical contact with a student is a necessary part of the teaching/learning homestay experience, Host Families must exercise caution to ensure that the contact is appropriate and acceptable. Host Families must always advise the student of what they intend doing and seek their consent. Any physical contact should be considered appropriate by a reasonable third party
- Reflect the highest standards of care in their behaviour towards and relationships with students. They must not under any circumstances engage in physical or emotional abuse or engage in sexual contact of any nature with a student. It is irrelevant whether the conduct is consensual or non-consensual, or condoned by parents or caregivers. Failure to behave in an appropriate manner may result in criminal proceedings and/or disciplinary action

- Ensure alcohol use by residents and visitors does not pose a risk to the student’s safety or wellbeing (students must not drink alcohol)
- Not use or permit the use of illegal drugs in the home
- Treat students with respect and listen to their concerns
- Seek support to manage cultural/behavioural/health issues from EdVenture, if required
- Treat students with respect and to listen to their concerns
- Be alert to any unsocial or improper behaviour by a homestay student
- Refer all issues of student misbehaviour to EdVenture (students must not be subjected to verbal abuse or physical punishment)

### Supervision of Students

Supervision of students should be in accordance with Policies and guidelines as outlined during host family orientations and in *Host Family Handbook*.

- ensure 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 the EdVenture 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)

### Injury/Illness/Allergies

EdVenture accesses and implements a range of procedures, guidelines, forms and resources to assist in effectively managing injuries, allergies and illness. Procedures for injury or illness are contained in *Host Family Handbook, Student Medication Plan and Health Care Plan*.

- ensure first aid is administered (if an appropriately qualified person is available) if a student is injured. Where possible, seek permission from the student for physical contact during treatment.
- obtain permission for necessary physical contact when treating injury or illness.
- arrange medical assistance for the student when required (as per communication flow chart)
- ensure appropriate care and supervision of a student who is sick or injured
- report all injuries and illnesses to the EdVenture, as soon as practicable. (*Incident/Daily Report*)

### Transportation

Transportation of students must be in accordance with policies contained in *Host Family Handbook*

- safe travel arrangements, in registered and roadworthy vehicles with appropriate insurance
- students are not permitted to travel in a vehicle operated by a provisional licence holder (“P-plates”) unless P-plate holder is 25 years of age and above), or by a learner licence holder (“L-plates”)
- students to be accompanied on public transport by age appropriate host family member
- ensure 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)
- obtain consent before taking the student’s photograph or making a video recording (students must be appropriately clothed)
- obtain consent before sharing information about the student (e.g. posting photos or comments about them on social media). Refer *Technology and Social Media Policy* document

## EdVenture Staff

Must maintain a high level of professional care and be aware of any potential dangers that may occur during the time the student is within their care. Staff will maintain a high level of “duty of care” and take on extra responsibility when required, to ensure that student safety is always a priority. They will:

- Respect the rights and dignity of every student, regardless of their abilities, gender, religion or cultural background and ensure that others in contact with them do the same.
- Follow the EdVenture Consulting Code of Conduct, policies and procedures.
- Interact with students in a positive and courteous manner and ensure that students are encouraged in their efforts and performance
- Provide appropriate supervision while in the care of EdVenture and ensure that student is never left unattended at school or on excursions.
- Ensure that any physical contact between staff and the student is always appropriate (ie: necessary at the time according to the activity and/or situation and that would not be reasonably determined by others to be offensive or inappropriate)
- Immediately communicate any concerns regarding host family’s personal circumstances (that may affect the student) to management including safety of student at pick up and drop off times.
- Ensure that responsible adults are aware of medical conditions related to the student within their care
- Ensure that all concerned are aware of what is required in times of emergencies.

## Relationships/one on one contact with student

- staff relationship with students is a professional one – staff are not permitted to have any kind of relationship with the student outside of work responsibilities.
- One on one time with students is only permissible when transporting student to host family/doctor or when you need to speak privately to student regarding an issue. Transportation should be in a roadworthy vehicle, fitted with age appropriate safety restraints.
- Where possible conduct any interactions within view of others.
- Gifts are not given to individual students unless it constitutes part of the EdVenture Program (eg: birthday). These gifts are provided by EdVenture management, not individual staff members. It is not appropriate for staff members to give personal gifts to study tour students.
- Must abide by guidelines set out in EdVenture *Technology and Social Media Policy*.

## Supervision of Students

Supervision of students should be in accordance with Policies and guidelines covered in the Staff Procedures Manual and as outlined during staff training.

- ensure appropriate age/needs supervision and care for students during school hours both at school and on excursion in accordance with EdVenture Policy *Staff/Student Ratios*
- ensure that proper procedures are followed for pick up and drop off of students by host families as follows:
  - a. Prior to first day of school, arrange an agreed daily meeting point for pick up and drop off. Ensure all parties are aware of location.
  - b. Host parent or sibling must escort student to and from meeting point. Unescorted students are not permitted to run across the street to meeting point.
  - c. Ensure you are aware of special arrangements for pick up or drop off (eg: carpooling, picking up their own children first etc)
  - d. Be at school prior to drop off time
  - e. Check off students as they arrive. If any students are not there prior to class commencement, check with HF
  - f. At pick up time, check off each student as they are collected. If any students are picked up within a reasonable timeframe, check with HF.
  - g. If HFs are consistently late without notice, advise the Homestay Coordinator
  - h. If students are not collected – contact Management

- i. If you are aware that HF is under the influence of alcohol or drugs, contact Management immediately. DO NOT ALLOW STUDENT TO GO HOME WITH THEM.
- j. If HF becomes violent, remove student and yourself from situation before it escalates. Notify police and EdVenture Director as soon as practicable.

### Injury/Illness/Allergies

EdVenture accesses and implements a range of procedures, guidelines, forms and resources to assist in effectively managing injuries, allergies and illness. Procedures for injury or illness are contained in *Staff Procedures Manual, Student Medication Plan and Health Care Plan*. First Aid training, including training on dealing with conditions particular to inbound groups (eg: epilepsy, anaphylaxis) is provided on an annual basis to all staff.

- ensure first aid is administered by appropriately qualified person (seek permission from the student, where possible)
- obtain permission from student for necessary physical contact when treating illness or injury (where possible)
  - do not administer any medication except what is brought to Australia by students
  - arrange appropriate medical assistance (dependent on nature of illness or injury) for the student when required
  - ensure appropriate care and supervision of a student who is sick or injured
    - a) if ill at school – use school sick bay.
    - b) If student wishes to go back to HF home, contact host family to see if it is possible, or ask homestay recruiter to do so.
    - c) If student attends local doctor – make appointment and accompany student
    - d) If serious illness or injury – senior staff will accompany student to hospital.
- report all injuries and illnesses to EdVenture management as soon as practicable. in case of serious illness and injury management will report to student’s natural parents as soon as possible.

### General Safety

- security/safety of premises/equipment used as part of EdVenture study tours is the sole responsibility of the Host School.
- Sun safe practices as outlined in Host Family Handbook, Staff Procedures Handbook and Running Sheet
- Water Safety as outlined in Host Family Handbook, Staff Procedures Handbook. Students are not permitted to swim at beach irrespective of supervision by lifeguards or Host Family. Swimming in pool at HF home only permitted under full supervision of responsible HF member who has first aid/resuscitation qualifications.

### Confidentiality of Information

Confidentiality of information is covered in EdVenture’s *Confidentiality and Privacy Policy for Student Information*.

### Physical Contact

In some circumstances, such as treatment of injury or assistance with activity, there may be a need for physical contact with student. In these situations:

- Where practicable, explain to student what contact will occur and why
- Seek permission from student where possible
- If possible, contact to be made within view of others to avoid any misunderstandings.
- If contact needs to be made in a more private situation, ensure a third party is present (eg: accompanying teacher)

### Transportation

Transportation of students must be in accordance with policies contained in *Staff Procedures Manual*

- Staff transportation of students is permitted with prior consent from EdVenture management, in such circumstances as medical need or assistance with transport of students to host family all transportation of students must be in registered and roadworthy vehicles with appropriate insurance and properly fitted seatbelts

- drivers must hold current valid drivers' license
- ensure students are accompanied to and from school and for all other travel by host families

### Behaviour Management Strategies

- Liaise with ESL teacher, Host Families, Host School and visiting teachers to monitor the behaviour of students.
- Any behavioural issues should be included in Daily Report, along with action taken during the day, including behaviour, illness etc.
- Behaviour management must not be punitive, humiliating or aggressive.
- When speaking to a student privately, ensure you are in view of others whilst doing so, if at all possible.
- Serious behavioural problems such as physical violence, sexual contact or dangerous risk-taking are escalated immediately to Operations Manager or Director.

### BEHAVIOUR MANAGEMENT PLAN

Example	Frequency	Management Plan
Minor behavioural issue eg: <ul style="list-style-type: none"> <li>• Spending too much time in room</li> <li>• Not using 'please' and 'thank you' or being courteous</li> <li>• Not following HF/Program rules</li> <li>• Staying up late at night</li> <li>• Disrupting class</li> <li>• Inappropriate use of electronic devices/social media</li> </ul>	First instance/complaint	<ul style="list-style-type: none"> <li>• Remind group in general about expected behaviours in host family host as per Student Handbook.</li> <li>• Make note in Daily Report</li> <li>• Follow up the next day with whoever made complaint.</li> </ul>
	Second instance/complaint	<ul style="list-style-type: none"> <li>• Speak privately to student in question and ask for their view of situation. Sometimes there is a communication problem which just needs to be clarified.</li> <li>• Remind student of EdVenture rules.</li> <li>• Make note in Daily Report</li> <li>• Follow up the next day with whoever made complaint.</li> <li>• Speak to visiting teacher regarding behaviour. Often the intervention of their teacher from home will have the desired effect.</li> </ul>
	Third instance/complaint	<ul style="list-style-type: none"> <li>• Conference with person reporting problem, Group Coordinator and student.</li> <li>• Try to mediate a solution to undesired behaviour.</li> <li>• Advise of possible consequences of continuing behaviour which may include removal from host family home/school program etc.</li> <li>• Continue to monitor behaviour until end of program.</li> </ul>
Major issue <ul style="list-style-type: none"> <li>• Physical violence by student</li> <li>• Stealing/theft of any type</li> <li>• Drug taking</li> <li>• Alcohol consumption</li> <li>• Sexual misconduct (genuine or perceived)</li> </ul>	As soon as you are made aware...	<ul style="list-style-type: none"> <li>• Contact Director as soon as advised</li> <li>• Immediate meeting with student, teacher and EdVenture representative and any other affected party (if they wish to be involved) to ascertain what has happened.</li> <li>• Removal from program if accusation has basis in fact</li> <li>• Possible report to police if criminal offence has occurred.</li> </ul>

### Managing Complaints

Complaints received from host families, students, host school or accompanying teachers should be dealt with as follows:

- complaints should be handled in a courteous and diplomatic manner. Often problems arise from misunderstandings due to poor communication/language skills.
- any issues should be included in Daily Report.
- staff should remain impartial and listen to all parties.
- serious complaints should be escalated immediately to management

SUMMARY OF APPROPRIATE AND INAPPROPRIATE BEHAVIOUR

BEHAVIOUR	APPROPRIATE (expected standard)	INAPPROPRIATE (not permitted)
Language	<ul style="list-style-type: none"> <li>Use positive words and a pleasant tone of voice</li> <li>Create a relationship of open and honest communication</li> </ul>	<ul style="list-style-type: none"> <li>Insults, criticism</li> <li>Bullying, swearing or yelling</li> <li>Sexual suggestive comments or jokes</li> <li>Racist remarks or jokes</li> </ul>
Relationships	<ul style="list-style-type: none"> <li>Be a positive role model</li> <li>Build a relationship of trust</li> <li>Allow participants to be open/honest without fear of repercussion.</li> </ul>	<ul style="list-style-type: none"> <li>Excessive time alone with the participant</li> <li>Bullying or harassment</li> <li>Encouraging any physical or emotional bond of a sexual orientation</li> </ul>
Physical Contact	<p><i>Where practicable, explain to student what contact will occur and why and, seek permission from student before contact occurs.</i></p> <ul style="list-style-type: none"> <li>Respect personal space</li> <li>Injury management and dealing with a medical condition that requires physical touch</li> <li>Assisting with an activity</li> <li>Physical contact that is custom or required. eg: a welcome hug on arrival (though Asian students may not feel comfortable with this, so it is advisable to limit)</li> </ul>	<ul style="list-style-type: none"> <li>Violent or aggressive behaviour – hitting, pushing, slapping etc.</li> <li>Physical contact which makes the other party uncomfortable.</li> <li>Any touch of a sexual nature</li> </ul>
Behaviour / Personal Appearance	<ul style="list-style-type: none"> <li>Dress appropriately</li> <li>Discussions that are appropriate to the age, culture and situation of the participant</li> <li>Use of any other communication media in an appropriate manner</li> </ul>	<ul style="list-style-type: none"> <li>Wearing clothes are revealing and inappropriate to the situation</li> <li>Use of alcohol or other substances where such use will impact on your ability to safely be responsible for the participant</li> <li>Discussing issues that are not considered appropriate in so consideration of the participant’s age, gender, culture and/or religion</li> <li>Sending inappropriate messages via email or text</li> </ul>
Supervision	<ul style="list-style-type: none"> <li>Staff to student ratio to ensure proper supervision of students as outlined in Staff Manual</li> <li>Engage students in safe activities, set out rules for participating students and always maintain careful supervision</li> <li>Supervise all activities that are outside the home/classroom or ensure a responsible adult is there to supervise</li> <li>Adhere to set drop off and pick up times/locations as outlined in Group Itinerary.</li> <li>EdVenture staff to be advised of any variations to drop off or pick up arrangements, including delays</li> </ul>	<ul style="list-style-type: none"> <li>Allowing students to be alone at host family home</li> <li>Travelling to/from home to school or shopping centre alone.</li> <li>Allowing student to walk in neighbourhood alone or at a shopping centre.</li> <li>Unsupervised outdoor activities such as swimming /sporting activities etc</li> <li>Leaving student unattended at host school.</li> </ul>
Discipline/Behaviour Management	<ul style="list-style-type: none"> <li>Behaviour management in consultation with EdVenture staff</li> <li>As outlined in Staff Manual/Student Handbook</li> </ul>	<ul style="list-style-type: none"> <li>Any form of corporal punishment</li> </ul>



## Privacy

All parties must

- respect the privacy of the student while exercising appropriate supervision
- obtain consent before taking the student's photograph or making a video recording (students must be appropriately clothed)
- obtain consent before sharing information about the student (e.g. posting photos or comments about them on social media). Full names or any other identifying information is not to be used on Social Media.
- Media Release Form should be signed by natural parents/guardians.
- any professional photographer employed by EdVenture Consulting must have a current Blue Card. Any photographs taken remain the property of EdVenture and are not to be used for any other purpose.

## BREACHES OF THE CODE OF CONDUCT

Any breach of these Codes of Conduct, including any failure to report a breach of these Codes of Conduct may result in:

- termination of the Staff Member/ Host Family's participation in the Homestay Program;
- removal of the Homestay Student from the Host Family
- In the case of abuse of any nature – reporting to the relevant authorities

## RECRUITMENT, TRAINING AND MANAGEMENT OF STAFF AND HOST FAMILIES

EdVenture Consulting recognises that risk management for children in homestay begins with the recruiting, screening and selection of the right people to provide accommodation 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.

### STAFF

**Recruitment of staff** - Staff selection is undertaken by The Director, in accordance with *EdVenture Recruitment, Training and Management Policy for Staff* (separate document). This policy applies to all staff, including emergency placements. New staff undertake an Induction process as outlined in *Induction Checklist*

**Training of staff** - Training topics/material reviewed biannually prior to planning of training calendar, considering any areas which require follow up/improvement. Feedback is provided by all parties to assist in planning of future training.

**Staff Management** - Complaints/Grievance procedures are outlined in *the EdVenture Employment Manual*. This Manual is provided to all staff and is covered in the induction process.

**Performance Reviews** – Staff performance is reviewed at the end of each season by Operations Manager and Director as outlined in the *Staff Appraisals Report*

### HOST FAMILY

Host Family selection is undertaken by Homestay Recruitment staff in accordance with *EdVenture Recruitment, Training and Management of Host Families Policy* (separate document)

- EdVenture Consulting will ensure that all relevant staff and Host Family members hold a current Blue Card.
- EdVenture will provide a copy of the current Risk Management Strategy to all parties and make it available on the company website;
- EdVenture will also explain the key procedures and supply a copy of the Incident Form if required;

## HANDLING DISCLOSURES OR SUSPICIONS OF HARM

### Definition of Harm

Harm is defined as any detrimental effect of a significant nature and can be caused by physical, psychological or emotional abuse or neglect; or 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.

### TYPES OF ABUSE

<b>Physical abuse</b> <ul style="list-style-type: none"><li>• Hitting</li><li>• Shaking</li><li>• Burning/scalding</li><li>• Biting</li><li>• Causing bruise or fractures by excessive discipline</li><li>• Poisoning</li><li>• Giving children alcohol, illegal drugs or inappropriate medication</li><li>• Domestic and family violence</li></ul>	<b>Psychological or Emotional abuse</b> <ul style="list-style-type: none"><li>• Scapegoating</li><li>• Persistent rejection or hostility</li><li>• Constant yelling, insults or criticism</li><li>• Cultural affronts</li><li>• Teasing/bullying</li><li>• Domestic and family violence</li></ul>
<b>Neglect</b> <ul style="list-style-type: none"><li>• Not giving a child enough food, housing, clothing, enough sleep, hygienic living conditions, health care and adequate supervision</li><li>• Leaving children unattended</li><li>• Children missing school</li></ul>	<b>Sexual abuse or exploitation</b> <ul style="list-style-type: none"><li>• Kissing or holding a child in a sexual manner</li><li>• Exposing a sexual body part to a child</li><li>• Exposing children to sexual acts or pornography</li><li>• Making obscene phone calls or remarks to a child</li><li>• Having sexual relations with a child or young person under 16 years of age</li></ul>

### Guiding principle

EdVenture Consulting accepts that in circumstances of harm or suspected harm, the safety of the homestay student, and any other children or young people involved is paramount, immaterial how the harm is caused.

### Suspicion of harm

A suspicion of harm is when someone has a reasonable suspicion that a child has suffered, is suffering, or is at an unacceptable risk of suffering significant harm. This includes circumstances which relate to an unborn child who may need protection after he or she is born. A child who has been, or may be experiencing, abuse may show behavioural, emotional or physical signs of stress and abuse. See <https://www.communities.qld.gov.au/childsafety/protecting-children/what-is-child-abuse/signs-of-child-abuse-and-neglect> for further information.

EdVenture Consulting acknowledges that there are reasonable grounds to suspect harm if:

- there is a significant change in the behaviour of the homestay student, (eg: aggressive behaviour/difficulty in concentration, withdrawn or overly compliant);
- the presence of new unexplained or suspicious injuries;
- student is reluctant to go back to host family after school
- student has insufficient or no food at school

### Disclosure of harm

A disclosure of harm occurs when someone, including a child, tells you about harm that has happened, is happening, or is likely to happen to a child.

Disclosures of harm may include:

- the homestay student/host children/host family advise EdVenture Consulting they have been harmed
- someone else, for example another student, parent or staff member advises EdVenture that harm has occurred or is likely to occur;

- the homestay student/host children/host family tells EdVenture that they know someone who has been harmed (it is possible the homestay student is referring to themselves);

It is important to act quickly and in the best interests of the child or young person after a disclosure of harm is received, irrespective of the alleged source of harm

### Receiving a Disclosure

Disclosures of harm may start with:

- 'I think I saw...'
- 'Somebody told me that...'
- 'Just think you should know...'
- 'I'm not sure what I want you to do, but...'

A disclosure of harm occurs when someone, including a child, tells you about harm that has happened, is happening, or is likely to happen to a child for example:

- the homestay student/host children/host family tells EdVenture Consulting they have been harmed someone else, for example another student, parent or staff member advises EdVenture that harm has occurred or is likely to occur;
- the homestay student/host children/host family tells EdVenture that they know someone who has been harmed (it is possible the homestay student is referring to themselves);

When confronted with disclosures of harm or suspect harm to children and young people, EdVenture staff will respond professionally and in the best interests of the child or young person subjected to the alleged harm. Complaints will be dealt with promptly, seriously, sensitively and confidentially.

- Any staff member confronted with disclosures of harm will:
  - a. Not react in a shocked or critical way
  - b. Reassure the child or young person that they have done the right thing in telling
  - c. Advise the student that you need to tell someone else who can help the child or young person
  - d. Ask only non-leading questions
  - e. Only ask the child or young person enough questions to determine the need to report the matter to EdVenture Management, Department of Communities, Child Safety Services or the Queensland Police Service depending on severity of disclosure.
  - f. Keep detailed notes of disclosure (*Disclosure of Harm Report*)
  - g. Ultimately believe the child or young person and assume that they are telling the truth
  - h. NOT attempt to investigate or mediate an outcome.

### Management and reporting of disclosure or suspicion of harm

Reporting Disclosure of Harm - Upon receipt of a disclosure of harm, Staff should complete a *Disclosure of Harm Report* and advise the Director. Following a disclosure of harm from a child or young person, EdVenture will investigate whether the allegation should be reported to the Queensland Police Service or the Department of Communities, Child Safety Services. If the incident(s) are serious or criminal in nature, the EdVenture's response will be immediate. All other allegations should be actioned as soon as possible, preferably within 24 hours. **The staff member involved is encouraged to be involved in the reporting process, to protect the integrity of the information being reported.**

For allegations of a serious or criminal nature, EdVenture Consulting will follow these guidelines:

- a. If the allegation involves a child at risk of harm, the incident should immediately be reported to the police and/or the Department of Communities, Child Safety Services. *During normal business hours - 1300 682 254 /After hours and on weekends - contact the Child Safety After Hours Service Centre on 1800 177 135 or (07) 3235 9999. The service operates 24 hours a day, seven days a week or contact Queensland Police on (07) 3364 6464 to seek a referral to your local Queensland police service child protection unit.*

- b. EdVenture will contact the Department of Communities, Child Safety Services for advice if there is any doubt whether the complaint should be reported
  - c. If the child's host family is suspected of committing the abuse, EdVenture will report the allegation to the Police or the Department of Communities, Child Safety Services immediately
  - d. If an EdVenture staff member is suspected of committing the abuse, EdVenture will report the allegation to the Police or Dept of Communities, Child Safety immediately.
  - e. Strict confidentiality, impartiality, fairness and due process must always be maintained. Under no circumstances will EdVenture Consulting conduct its own investigations into any serious allegations or allegations of a criminal nature.
- **Reporting Suspicion of Harm** - If staff suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm, Child Safety (ph 1800 177 135) will be contacted for advice on whether or not to make an official report. Staff should keep detailed notes of their observations in the case that it is needed for an official report. **The staff member involved is encouraged to be involved in the reporting process, to protect the integrity of the information being reported.**
  - If there is a disclosure of harm, or suspicion of harm involving an EdVenture staff member all of the above steps will apply.
  - Management of disclosure or suspicion of harm is the responsibility of The Director, Janet Venturini. Any concerns regarding the safety of children should be directed to [janet@edventureconsulting.com](mailto:janet@edventureconsulting.com) or by phone 0413 633 315. It is responsibility of the Director to:
    - a. Review and manage policies and procedures for handling disclosures or suspicions of harm
    - b. induction and annual training of paid employees in handling disclosures or suspicions of harm
    - c. provide paid employees and volunteers with a copy of EdVenture policies and procedures for handling disclosures or suspicions of harm, as well as the phone numbers of key contacts
    - d. offer assistance and support when a person in the organisation receives a disclosure of harm including identifying appropriate external support where needed.
    - e. maintaining appropriate confidentiality of reports (both verbal and in written form) regarding issues
    - f. organising external support to assist parties following a disclosure or suspicion of harm
    - g. develop processes for minor corrective issues that don't need to be reported to an outside authority,
    - h. dealing with the media
  - **Mandatory Reporting Obligations** - People with mandatory reporting obligations include doctors, registered nurses, approved teachers employed at a school and police officers with child protection responsibilities. These individuals MUST report to Child Safety a reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm caused by physical or sexual abuse AND does not have a parent able and willing to protect the child from the harm. Mandatory reporters should also report to Child Safety a reasonable suspicion that a child or unborn child may be in need of protection where the harm or risk of harm relates to any other type of abuse or neglect under s13A of the Child Protection Act 1999.
  - IF THE MATTER IS URGENT AND CHILD IS IN IMMEDIATE DANGER: CALL 000

## MANAGING BREACHES OF THE RISK MANAGEMENT STRATEGY

### Definition

A breach is any action or inaction by any stakeholder that fails to comply with any part of this strategy. Any action or inaction which compromises a student's safety is a breach of this strategy. Stakeholders include Employees, Host Families, staff and contractors as well as children and young people involved in EdVenture Study Tours.

EdVenture Consulting will review any allegations of breaches of the Child Protection Risk Management Strategy and will take steps to minimise the risk of any further breaches by the ongoing review of current policies and procedures. Non-compliance with the "Working with Children (Risk Management and Screening) Act 2000" will result in penalties imposed under the Act. Refer to the Act for information regarding failure to comply.

### Managing breaches

Breaches are reported to the Operations Manager and will be referred to the Director as required. Serious breaches will be advised to Police or Child Safety depending on the nature of the breach. A report will be made, along with any action taken. Breaches will be managed in a fair and unbiased manner. Appropriate confidentiality of outcomes will be maintained.

#### Host family

MINOR BREACHES report to Coordinator/Homestay	MAJOR BREACHES report to Operations Mgr/Director
arriving late for pick up drop off failure to update blue card contact information failure to comply with expectations as listed in HF handbook	Any abuse of student – verbal, physical, emotional sexual Breach of student's privacy Offering student drugs or alcohol Allowing the student to engage in prohibited activities as outline in HF handbook p4

#### Staff

MINOR BREACHES report to Operations Mgr/Director	MAJOR BREACHES report to Operations Mgr/Director
Rudeness towards stakeholders including children objectionable or insulting behaviour, harassment, bullying or bad language; unsanctioned personal or social media contact with students outside of program	Any abuse of student – verbal, physical, emotional, sexual Driving student whilst unlicensed or under the influence of drugs or alcohol

#### Student

MINOR BREACHES report to Coordinator/Operations Mgr	MAJOR BREACHES report to Operations Mgr/Director
Failure to obey EdVenture rules Failure to obey HF rules	Consumption of drugs/alcohol Inappropriate language and behaviour (including sexual) Stealing Intentional damage to property

#### Suppliers

MINOR BREACHES report to Operations Mgr	MAJOR BREACHES report to Director
Rudeness towards stakeholders including children objectionable or insulting behaviour, harassment, bullying or bad language;	Any abuse of student/child – verbal, physical, emotional sexual

**A communications flowchart is available in Staff Procedures Manual and Host Family Handbook**

## Breach Management

Minor breaches will be managed by appropriate staff in accordance with the instructions of the Director. Major breaches will be managed by the Director, with advice to Police or Child Safety as required.

### Host Family

*Breaches will be managed by ongoing monitoring of homestay providers and placements.*

#### Minor breach

- reminder of the relevant component of EdVenture Risk Management Strategy (for example: Code of Conduct)
- mediation between those involved in the incident, where appropriate

#### Major breach

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

### Students

*Breaches will be managed by ongoing monitoring of student behaviour via feedback from host families, teachers and coordinators.*

#### Minor breach

- EdVenture/Host School disciplinary action

#### Major breach

- removal from the homestay/host home
- cancelling your participation in the homestay program
- removal from the school program

### Staff

*Employee breaches of this strategy will be managed in accordance with EdVenture Code of Conduct and Staff Employment Manual and will include:*

#### Minor breach

- reminder of the relevant component of EdVenture Risk Management Strategy (for example: Code of Conduct)
- increased supervision of staff involved
- mediation between those involved in the incident, where appropriate
- further education and training

#### Major breach

- disciplinary action in accordance with *Staff Employment Manual*
- termination of your participation in the homestay/host program
- reports to the police or Child Safety Services, if warranted.

### Suppliers

*Breaches will be managed by ongoing monitoring of Suppliers*

Minor breaches will result in review of further engagement. Major breaches will result in cancellation of any further contracts and report to police or Child Safety if warranted.

## COMPLIANCE WITH BLUE CARD/ WWC LEGISLATION

ROLES WITHIN EDVENTURE REQUIRING BLUE CARDS as per WWC (Risk Management & Screening) Act 2000	
PAID (STAFF)	VOLUNTEER
Group Coordinators, Homestay Coordinators, Teachers, Operations Manager, Director	Any host family member over the age of 18 years
EXEMPTIONS: Teachers registered with Qld College of Teachers	EXEMPTIONS: Child under the age of 18 or relative of child living in the homestay.

- EdVenture Consulting will comply with Blue Card/WWC legislation by ensuring that staff who provide child related services regulated by the Act (in this instance, these staff would include Group Coordinators, Homestay Coordinators, Teachers and Management) will undergo WWC check and obtain a positive notice Blue Card (where exemptions do not apply eg: registered teachers). EdVenture Consulting's Management will assist relevant staff in seeking approval to work with children from Blue Card Services (Dept of Justice and Attorney General).
- EdVenture Consulting will comply with Blue Card/WWC legislation by ensuring that host family members and other volunteers over the age of 18 years will undergo the Working with Children Check and obtain a positive notice Blue Card (where exemptions do not apply eg: registered teachers, police officers, doctors etc). Further information regarding Blue Card requirements is available at <https://www.bluecard.qld.gov.au>
- All Suppliers' staff who are in contact with EdVenture students must have Blue Cards. Stipulation of compliance is included in EdVenture booking forms.
- **Contact persons for Blue Card related matters are: Operations Manager and the Director. Blue Card Services is notified if there is a change of authorized persons.**
- A Blue Card Register will be maintained for all staff, volunteers and relevant (over the age of 18) host family members.
- Compliance with the Child Protection Policy included within this Risk Management Strategy will help ensure that EdVenture Consulting complies with Blue Card legislation.
- EdVenture Consulting will respect the confidentiality of information relating to applications by volunteers for Blue Cards and will maintain appropriate systems to protect the privacy of applicants

### Annual Review of Strategy

- An annual review of the Risk Management Strategy is scheduled and undertaken each year in December.
- Additional reviews are to be undertaken following any incident where a child is harmed or at risk of harm or when a breach of strategy is identified.
- Each Review is documented, and any changes are made at that time and communicated to Stakeholders.

## Applications, exemptions, links and Renewals of Blue Cards

Full procedure for Blue Card is covered in *EdVenture Blue Card Process Guide*, however in essence:

- Blue Card applications/link forms are completed by Homestay Coordinators at the time of home visit to host family. *Blue Card Process Guide* contains full procedures.
- Blue Cards requiring renewal are monitored by the Blue Card Compliance Officer, who contacts BC holder 4 weeks prior to remind of expiry. Any BC holder no longer being used by EdVenture is removed from Register and Unlink notification is sent to BCS.
- “No Longer with Organisation” forms are completed for any Host Family or staff member who is no longer with the organisation. A database diary note in either HF profile or Staff profile is made of this action and that person is marked as “inactive”.
- Follow up with BCS is undertaken by Operations Manager 6 weeks after submission of application to ensure that application has been approved or had commenced approval process
- Any staff member or host family member who does not hold a valid Blue Card is not eligible to participate in EdVenture Programs. As all staff have direct contact with children, there are no exceptions.

## RISK MANAGEMENT PLANS FOR HIGH RISK ACTIVITIES AND SPECIAL EVENTS

- EdVenture Consulting has established a risk register which identifies and evaluates the risks involved with accommodation, support and general welfare of students, and an established process for developing strategies to minimise the impact of these risks.
- A copy of risk register is included in *Staff Manual*.
- Individual Risk Management Plans are established for specified excursions/incursions (separate documents)
- Copies of plans are provided to Stakeholders
- Ongoing and annual review of plans with feedback from stakeholders

## COMMUNICATION AND SUPPORT STRATEGIES

EdVenture Consulting acknowledges and accepts that a key aspect of Risk Management is regular and structured communication. The contact details for each of the relevant persons referred to in this Risk Management Strategy is stored in a secure database. EdVenture will use reasonable endeavours to ensure that all persons to whom this Risk Management Strategy applies will:

- 1 read the Risk Management Strategy;
- 2 attend training provided by EdVenture regarding Risk Management and analysing Risk in the Homestay Program;
- 3 Training material to include identification of risks of harm and how to handle and outline the Risk Management Strategy
- 4 read the material provided by EdVenture in relation to the Homestay Program and child protection. This material will be readily accessible to relevant parties and will include Staff Manual, Host Family Handbook and Student Workbook.
- 5 This material is updated annually and on an as needs basis with feedback in relation to Risk Management Strategies.
- 6 Encourage consultation and feedback via various techniques such as “Policy of the Month”, where stakeholders can provide any suggestions for strengthening the policy.



# Risk management plan for high risk and special events



Description of Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
<b>Pre Arrival</b>						
Homestay Student/Group misses the flight/connection from home country	Possible	Minor	Minor	Email and phone communication between Tour Guide, parents, agents and EdVenture	Agent contacts EdVenture	Agent
Flight arrival delayed at final destination	Possible	Minor	Moderate	Phone communication between the Group Coordinator, EdVenture and Host Families	Group Coordinator contacts EdVenture/homestay.	Group Coordinator
Homestay Student ill/injured during the journey	Possible	Moderate	Moderate	Phone communication Tour Guide, agent, and EdVenture	Group Coordinator seeks medical attention if necessary. Contacts <del>EdVenture</del> <del>who</del> advise Agent and Host Family	Group Coordinator contacts EdVenture
<b>Post Arrival</b>						
Mismatch between student and Homestay family	Possible	Moderate	High	Homestay recruitment, induction and monitoring process. Arrival Orientation Information provided to Homestay Students regarding reporting of problems	EdVenture's discretion. If agent is involved after the decision, and the Homestay Student is still unhappy – EdVenture will remove student	<del>EdVenture</del> Management
Student takes unprescribed medication/takes medication in incorrect dosage	Possible	Moderate/high	Moderate/high	Only medication included on student application and accompanying medical form from doctor is to be taken. If students are too young to be responsible for medication, host family or accompanying teacher to administer as per doctor's report.	Seek medical advice, either from Poisons Information or medical practitioner	EdVenture Management

Description of Risk	Likelihood	Consequence	Level of risk	Control mechanism	Response strategy	Responsibility
Serious Allergic reaction	Possible	Moderate/high	Moderate/high	All allergies to be documented in prearrival medical report along with care plan.	Seek medical advice as per procedures	EdVenture Management
Serious illness or Injury	Possible	Moderate/high	Moderate/high	EdVenture procedures. Communication between HF and EdVenture.	Seek medical advice as per procedures	EdVenture Management
Accusation of abuse or abuse of HF children by Student	Possible	Catastrophic	Extreme	Student Code of Conduct, Orientation	Move student to another HF (without children). Initiate investigation.	EdVenture Management
Abuse or accusation of abuse of Homestay Student by HF	Possible	Catastrophic	Extreme	Blue Card register. Regular communications between student, coordinator and Homestay. Informal sharing of information across networks of inappropriate families. Regular monitoring of homestay by the Group Coordinator.	Immediately move the student to another HF. EdVenture to arrange counselling and/or medical treatment. EdVenture to contact police and student's family. Access other DET services.	EdVenture Management

**Departure**

Airport Pick up does not arrive	Unlikely	Moderate	Moderate	Early arrival plans at airport, Group Coordinator to confirm pickup 24 hours prior. Communication between pickup service and Group Coordinator	Group Coordinator to contact Bus Company to arrange immediate alternative transport and advise EdVenture Management	Group Coordinator & Bus Company
Student/Group misses flight	Unlikely	Moderate	Moderate	Early arrival plans at airport, Homestay Provider to assist with early preparations	Agent advised and alternative arrangements made	Group Coordinator & Management

## Related Policies and Documents

- Host Family Handbook
- Orientation Program for Host Families
- Group Itinerary
- Host Family/Student Evaluation Forms
- Risk Management Plan for High Risk and Special Events
- Staff Procedures Handbook and Staff Employment Manual
- Procedure for Student Pick up and Drop off
- Staff Employment Manual
- Student Workbook
- Recruitment, Training and Management of Staff Policy
- Recruitment, Training and Management of Host Families Policy
- PowerPoint training module on identifying and reporting abuse
- Student Medication/Health Care Plan
- Disclosure of Harm Report