



Family Homestay Services

Your safe and friendly family away from home

www.familyhomestay.com.au

Postal address:
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Australia

Child Safety and Wellbeing Policy - DRAFT

Preamble

1. Purpose of this policy:
 - a. Family Homestay Services ('FHS' or 'us' [or derivatives thereof], ABN 37 111 924 095) is committed to an environment that prioritises child safety and wellbeing.
 - b. This policy outlines how this commitment is upheld.
2. Our commitment:
 - a. All children who use our services have a right to safety.
 - b. Welfare of children using our services is absolutely prioritised.
 - c. We have a zero-tolerance stance to child abuse.
3. We uphold this commitment by:
 - a. Encouraging a culture where prevention and reporting of abuse is supported.
 - b. Ensuring that all FHS staff, contractors, and homestay families are aware of, and are responsible for, upholding those values.
 - c. Paying specific attention to children with vulnerabilities (including from Culturally and Linguistically-Diverse ['CALD'] backgrounds.)
 - d. To reflect updated knowledge of child safety, by:
 - i. For staff, undertake regular training and professional development on child safety; and
 - ii. Continually reviewing our policies and processes (including risk management) to ensure child safety remains embedded in our standard practices; and
 - iii. Engaging our organisation (which includes all parties listed in Section 9 below) in ongoing education, training, and consultation on the Code.

Definitions

4. These definitions apply throughout this document, unless otherwise specified:
 - a. Child – a person under the age of 18.
 - b. Homestay host/ homestay family – a family who has agreed to accept international students from us in a homestay arrangement, through a signed agreement.
 - i. Please see signed agreement between us and homestay family for precise scope of what 'homestay' entails.
 - c. Homestay student – a person who uses FHS's homestay services.
 - d. FHS staff – persons employed by us, including directors, management, full-time, part-time, or casual staff.
 - i. This includes contractors who have contact with children.

- e. FHS management – FHS staff members who hold director and management positions.
 - f. Authorities – Australian statutory bodies with power to determine and enforce child safety standards. The primary ones are:
 - i. Office of Children’s Guardian, NSW (‘OCG NSW’);
 - ii. Commission for Children and Young People, Victoria (‘CCYP Vic’);
 - iii. Police and judiciary of respective jurisdictions.
 - g. Child Safe Standards – refers to standards implemented in 2022 in NSW (‘NSW Standards’) and Victoria (‘Vic Standards’).
5. **Child abuse** is defined to include the following¹:
- a. **Physical abuse** – intentional or reckless use of (including threats thereof) physical force that results in harm to child’s health, development, or dignity.
 - b. **Sexual abuse** – actions that expose a child to sexual processes beyond his/her understanding, or contrary to accepted community standards.
 - i. This can include both sexual offences (criminal offence) and sexual misconduct (sexual in nature but is not necessarily a sexual offence.)
 - c. **Emotional abuse** – behaviour towards child that is likely to damage his/ her self-esteem or social competence.
 - d. **Neglect** – failure to act in ways consistent with accepted community standards about what is necessary to meet developmental needs of a child.
 - e. **Ill-treatment** – conduct towards a child that is unreasonable and seriously inappropriate, improper, inhumane, or cruel.
 - f. **Grooming** - behaviour intended to manipulate and control a child, their family, and their support network, with the intent of gaining access, trust, and silence of the child in order to avoid discovery of abuse.
6. **Harm**² – is defined as damage to health, safety, or wellbeing of a child.
- a. This includes the result of Child Abuse by adults or conduct of other children.
 - b. Harm can arise from a single act/ event, or be cumulative over time.
7. **Behaviours of concern** – is defined behaviours that:
- a. In isolation, may not necessarily breach our Code of Conduct, or any laws;
 - b. But when taken together may indicate an increased risk of abuse/harm.
 - c. Such behaviours are also subject to reporting under this policy.
8. **Concern and complaints**³ –
- a. Concern - any potential issue that could impact negatively on the safety and wellbeing of children.
 - b. Complaint - an expression of dissatisfaction to us related to one or more of the following:
 - i. allegations of abuse or misconduct by a person under the scope of this policy (see Section 9);

¹ OCG NSW (2022), *Codes of Conduct – a guide to developing child safe Code of Conduct*. ([Link](#) [pdf] as of 21/12/2022).

² CCYP Vic (2022), *Codes of Conduct – a guide to developing child safe Code of Conduct*, OCG NSW. ([Link](#) [pdf] as of 21/12/2022).

³ CCYP Vic (2022), *Codes of Conduct – a guide to developing child safe Code of Conduct*, OCG NSW. ([Link](#) [pdf] as of 21/12/2022).

- ii. disclosures of abuse or harm made by a child;
- iii. the conduct of a child using our services;
- iv. the inadequate handling of a prior concern.

Scope

- 9. This policy applies to:
 - a. All FHS staff; and
 - b. All homestay hosts.
 - i. This policy applies whether the homestay host is actively hosting an international student, unless homestay agreement is terminated.
 - ii. This policy applies to all persons residing in the homestay family, including:
 - 1. Under-18 persons; and
 - 2. Other international students.
 - iii. Whilst they may not be employees, they must still uphold this Policy as part of their agreement with FHS.
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The Policy

- 10. Children are encouraged and empowered to participate
 - a. FHS management actively seeks to consult with homestay students on how child safety and wellbeing can be upheld and promoted.
 - i. This includes consultation with associated organisations, including educational institutions, student bodies, and homestay hosts themselves.
 - b. We encourage children to support each other, and do not tolerate bullying or abusive behaviour between each other.
 - c. We will provide under-18 homestay students with information on their right to be safe engaging with us, and what to do if they feel unsafe.
- 11. Families and communities
 - a. We recognise the importance of involving the families of under-18 homestay students, particularly given the linguistic and cultural challenges faced by international students.
 - b. Families are welcomed to ask questions and raise concerns by contacting us.
 - c. We ensure families and communities are aware of our commitment and procedure towards child safety and wellbeing, by:
 - i. Publishing this Policy and Code of Conduct on our website;
 - ii. Include information about these documents in our under-18 student orientation pack, sent to under-18 homestay students (or their agent/ school/ other representative).
 - iii. Regular posts in our social media about our child safety/ wellbeing procedures.

Cultural diversity and safety

12. Aboriginal culture

- a. FHS seeks to create an environment whereby Aboriginal children, families and community members are valued, welcomed, and included.
- b. We do so by:
 - i. Supporting children who wish to explore their culture, including consultation with their family and relevant organisations.
 - ii. Acknowledging significant Aboriginal cultural events.
 - iii. Seeking feedback from Aboriginal children, families and communities on their feeling of safety engaging with FHS.

13. Cultural And Linguistic Diversity ('CALD')

- a. As a service provider to international students, we prioritise value of diversity of all children, by:
 - i. Offering homestay students and their families opportunity to provide information about themselves, including any needs to help them participate safely and fully – e.g. religion, language, cultural needs.
 - ii. Having zero-tolerance towards racism and other forms of discrimination, and act when racism and exclusion are identified.
 - 1. Under Section 5, forms of racial/ cultural exclusion may be child abuse.
 - iii. Acknowledge and celebrate important cultural dates among our homestay families and students.
 - iv. Promote an environment that actively celebrates diversity.

Internal processes

14. FHS's management staff is responsible for:

- a. Creating and updating this policy to reflect legislative changes and most updated knowledge in child safety and wellbeing.
- b. Encouraging a positive culture of reporting, such that persons involved with FHS can feel comfortable raising concerns.
- c. Ensuring reporting of concern is addressed timely and appropriate document is kept.
- d. Conduct appropriate child safety training for staff and homestay hosts.
- e. Develop and consult over a child safety/wellbeing risk management plan.
- f. Perform regular review of FHS's effectiveness in delivering child safety and wellbeing, by consulting with parties involved with FHS, including under-18 homestay students.

15. Employment and recruitment

- a. Child safety and wellbeing is prioritised in our recruitment process, both for staff and homestay families.
- b. We will only engage staff and homestay families (including persons residing therein) who are appropriate to engage with children, meaning:
 - i. They must hold a current and valid Working With Children Check ('WWCC') from their respective jurisdiction.
 - ii. Reference checks may be carried out.

Code of Conduct, complaints, and reporting

16. Persons bound by this Policy must abide by FHS's **Child Safety Code of Conduct**.

- a. Breaches may result in disciplinary action, which may include termination of involvement with FHS.

17. Reporting of complaints and concerns

- a. All reports of child abuse/ safety concerns will be taken seriously, and addressed promptly and thoroughly.
- b. If a complaint includes an allegation of child abuse/ harm, then persons covered by this Policy (Section 9) must report it in accordance to the **Complaint Handling Policy**.
 - i. All potentially-criminal conduct must also be reported to the appropriate Authority, which may include the Police.
- c. The Complaint Handling Policy contains information on:
 - i. How to raise a complaint;
 - ii. How complaints and concerns will be addressed;
 - iii. How persons may be subject to actions to support child safety.
- d. We will make complaint procedures easy to understand, both in the Complaint Handling Policy and other supplementary material.
- e. If there is concern about a child's immediate safety, immediately call 000.

18. Record keeping and information sharing

- a. All child safety complaints, concerns, and incidents are recorded in our internal system.
 - i. This includes information that may assist with investigation of the complaint, even if the investigation does not substantiate the complaint.
 - ii. This includes outcomes, resolutions, and reasonings for decisions made and actions taken.
- b. All information about complaints will be kept confidential, except where sharing of information is necessary to:
 - i. Respond properly to a complaint; or
 - ii. Prioritise child safety; or
 - iii. In compliance with the law.

Compliance, review, and support

19. Ease of access

- a. This policy, along with other associated child safety/ wellbeing policies, should be readily available and easy to find, e.g. displayed on our website.
- b. We will also make this policy available to all persons covered under its scope (Section 9) upon engagement, as well as being part of their ongoing training (Section 20).
- c. We will endeavour to make all child safety/ wellbeing policies simple to understand, including the use of culturally- and age-appropriate mediums.

20. Ongoing training plan

- a. FHS is committed in ensuring that child safety and wellbeing is not just a one-off occurrence – but all staff, homestay families, and homestay students receive regular, ongoing, and appropriate training to reflect updated best practices and legislative changes.

- b. For management staff – ensure regular review of communication from Authorities; attendance of training held by Authorities; and review of policies/ procedures.
- c. For staff/contractors – ensure regular internal education on our child safety policies and procedures.
- d. For homestay families – ensure regular training (online or in-person) and documented acknowledgement of understanding of these policies.
- e. For homestay students, families, communities – ensure they receive regular communication from us on best practices, and the child safety culture we strive for.
- f. We will document training attendance and acknowledgement to monitor level of knowledge maintained by staff and homestay families.

21. Risk assessment

- a. FHS has a **Child Safety Risk Management Plan**, developed in consultation with staff, homestay families, homestay students, and other relevant stakeholders (e.g. educational institutions, student bodies).
- b. This plan ensures a balance between the need to manage harm with benefits of using FHS's services.
- c. FHS management staff is responsible for developing, consulting, and reviewing the risk management plan.

22. Compliance

- a. This Policy forms part of any agreement of engagement with persons under the policy's scope (Section 9).
- b. FHS will enforce all policies relating to child safety and wellbeing, including those listed below as well as those embedded in other guidelines, e.g. Homestay Guidelines, employment policies, etc.
- c. FHS may address potential breaches by means of investigation, restriction of duties, suspension, or termination of engagement, or other appropriate corrective action.

23. Review

- a. FHS will review all child safe policies at least every two years.
- b. We will also review relevant practices and policies in response to a child safety/ wellbeing incident/ complaint/ 'near-miss'.
- c. Reviews are overseen by our management staff, and will involve consultation with our homestay students, families, and other stakeholders.

References

24. Supporting documents

- a. Child Safety and Wellbeing Policy
- b. Child Safety Code of Conduct
- c. Complaint handling policy
- d. Child Safety Risk Management Plan
- e. Homestay Guideline

25. Supporting legislation

- a. *Children’s Guardian Act 2019 (NSW)*
- b. *Child Wellbeing and Safety Act 2005 (Vic)* (including Child Safe Standards)

Acknowledgement and signature

I have read this Policy and agree to abide by it and its terms.

Name (print)	Signature
Date:	
Office use:	
<i>Last review</i>	<i>Next review</i>
<i>Responsible officer (print)</i>	<i>Responsible officer (sign)</i>

Appendix 1: How each Child Safe Standard (NSW and Vic) is addressed by this Policy

NSW Standards	Victorian Standards	In this policy
S1 – Child safety is embedded in organisational leadership, governance and culture	S2 - Child safety and wellbeing is embedded in organisational leadership, governance and culture.	Throughout document
	S1 - Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.	Section 12
S2 - Children participate in decisions affecting them and are taken seriously	S3 - Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.	Section 10 The Code
S3 - Families and communities are informed and involved	S4 - Families and communities are informed and involved in promoting child safety and wellbeing.	Section 11
S4 - Equity is upheld and diversity is taken into account	S5 - Equity is upheld and diverse needs respected in policy and practice.	Section 13

S5 - People working with children are suitable and supported	S6 - People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.	Sections 14, 17, 20
S6 - Processes to respond to complaints of child abuse are child focused	S7 - Processes for complaints and concerns are child-focused.	Section 10
S7 - Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training	S8 - Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.	Sections 14, 20
S8 - Physical and online environments minimise the opportunity for abuse to occur	S9 - Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.	Section 16 The Code
S9 - Implementation of the Child Safe Standards is continuously reviewed and improved	S10 - Implementation of the Child Safe Standards is regularly reviewed and improved.	Sections 14, 23
S10 - Policies and procedures document how the organisation is child safe	S11 - Policies and procedures document how the organisation is safe for children and young people.	Throughout document Sections 18, 21, 22