

- All SOTW Ltd employees are trained in how to take disclosures of abuse and respond appropriately. This is mandatory training to be taken at commencement of employment (see Staff Recruitment and Screening section of this policy)
- All host families are screened and monitored thoroughly and are aware of their responsibilities regarding child safety (see Host Recruitment and Screening section of this policy)
- Should any child request to stay (sleep over) at a residence other than that of their host family, their legal parents/guardians will need to be notified and sign a Consent Form (Appendix E) permitting their child permission to do so. Additionally, any adult at the premises of the 'sleep over' must have a police check and working with children clearance.
- Host families must receive information on Child Protection relevant to their state/territory within their Host Handbook (see Appendix J).

Code of Conduct

- SOTW Ltd staff must strictly follow the SOTW Ltd Code of Conduct (Appendix I). They must read and sign the code of conduct to acknowledge that they have understood it and are agreeing to comply with it.
- SOTW Ltd volunteers (host family members) must strictly follow the Hosting Code of Conduct (see Appendix K) They must read and sign the code of conduct to acknowledge that they have understood it and are agreeing to comply with it.
- Breaches to the Code of Conduct from employees will be subject to disciplinary measures including dismissal if deemed appropriate. A maximum of one warning will be issued per staff member.
- If a host family breaches the Code of Conduct they will be eliminated from the program.

Staff recruitment and screening

- It is important to SOTW Ltd that child safety happens at every stage of engagement with prospective employees and volunteers. All job advertisements, position descriptions and key selection criteria will include the SOTW Ltd statement of commitment to child safety (Commitment to child safety can be found at the top of this policy).
- Applicants must attend a face-to-face interview with SOTW Ltd Managing Director and a Child Safe Officer. If the Managing Director is unable to do this due to other commitments, the interview time will be re-scheduled to ensure the Managing Director and Child Safe Officer are in attendance.
- A minimum of 3 professional referees (whose identities have been confirmed) must be provided. Reference checks are undertaken by SOTW Ltd Managing Director and answers should be recorded and stored on Employee Referee Check (see Appendix L).
- Applicants are required to obtain;

- Working with Children Clearance (WWCC) - appropriate to the state/territory they will be working in
- National Police Check
- International Police Check (if potential employee has lived in a country for a duration of 6 months or longer within the last 10 years)
- Successful applicants are required to read and sign the SOTW Ltd Child Safe Policy and SOTW Ltd Code of Conduct (see Appendix M & I) to ensure they acknowledge that they have understood and agree to follow the behavioural expectations and standards of the company. These documents should be included in the Employment Agreement (see Appendix N).
- Successful applicants must provide two forms of photo identification that must be scanned and kept on file.
- Child Safe Training is mandatory at induction for all employees of SOTW Ltd and should be undertaken within 8 weeks of commencement of employment.
- All employees must strictly adhere to the SOTW Ltd Child Safe Policy and SOTW Ltd Code of Conduct (Appendix M & I). Should any employee breach these conditions of contract their employment will be terminated immediately, and the relevant state/territory governing bodies will be informed
- All SOTW Ltd staff and local coordinators are required to complete the following trainings for each relevant state/territory in which SOTW Ltd operates. All costs associated with the training are covered by SOTW Ltd.
 - South Australia - South Australian Department for Education and Child Development creating child safe environment (CSE) training
 - Victoria – The Victorian Child Safe Standards training and Creating Child Safe Organisations training
 - New South Wales – The New South Wales online training & Child Protection training approved by the New South Wales Registration Committee.
 - Queensland -
 - Tasmania -
- All directors of SOTW Ltd must have passed all above screening and training expected of employees, and signed SOTW Ltd Child Safe Policy and SOTW Ltd Code of Conduct (Appendix M & I).

Host recruitment and screening

- Host families will not be paid to host under any circumstances.
- Host families must fully complete a Hosting Application Form (see Appendix O) The form must include all family members and any partners who may not live in the residence but regularly visit the house. If they have a partner who visits the house, who intend to stay overnight (even once) at the residence they will need to follow the same screenings as all adults living in the house.

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- Host adults (anyone in the house over 18 years old) must sign the SOTW Ltd Child Safe Policy and Hosting Code of Conduct (Appendix M & K) to acknowledge they have understood and agree to follow all procedures.
- All adults living at the Host Family house must undertake the following screening processes:
 - I. National Police Checks
 - II. International Police Checks (If adults have lived in a country other than Australia for more than 6 months in the last 10 years)
 - III. Working with Children Checks (relevant to the state/territory that they live in)
 - IV. Screening of all publicly available online presence (e.g. social media)
 - V. 3 professional reference checks (for host parents/carers) These must be performed by a member of SOTW Ltd and recorded on a Hosting Reference Check (see Appendix P).
- Host families are unable to receive any information of their potential visiting student until all screening processes are complete (see screening processes in the above statement)
- A house visit must occur before the student arrives by a trained staff member who is external to the school environment to ensure objectivity. They must thoroughly assess the premises and ensure it is suitable for the safety and comfort of the child. A House Assessment Form (see Appendix Q) should be filled in, considering the different abilities and ages of inbound students.
- Ensure that bedroom sharing only occur when: both children are the same sex and there is no more than a 2-year age gap between children. It is essential that all children are comfortable with this situation and give their consent to share a bedroom. If this does not occur, the house will be deemed unsuitable and therefore the hosting cannot go ahead.
- A Host family interview should take place at the time of the house visit and must be done in-person. An Hosting Interview Form (see Appendix R) must be completed
- The children at the host house should be present during the family interview to contribute to the discussion and answer child related questions.
- If at any stage during the recruitment process a SOTW Ltd staff member has a 'gut feeling' about one of the hosts, they can treat as a red flag and use a risk minimisation process whereby we further assess the applicant.
- In all cases host families are interviewed in their home and referee checked as part of process of assessing their suitability to host.
- Host families must be made aware of their reporting obligations.
- SOTW Ltd employees must not act as a host family for an exchange student except in emergencies and with the approval of the registering authority.

Support and supervision for staff and volunteers

- Child safety must be a shared responsibility at all levels of SOTW Ltd and a priority that must be discussed in all team meetings.

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- No staff member should be allowed to continue working if their WWCC or state-based equivalent has expired. They must acquire a new one before continuing work.
- Managing Director must ensure child safe training (and any other related training) is up to date, and refresher training is organised every two years.
- Staff must complete 30 hours of face-to-face or online training to ensure professional development in child safety. This must be logged for supervisor reference and discussion in meetings.
- All staff must have access to the Staff Handbook (Appendix H) for their reference at all times. This must include (at minimum)
 - I. Child Safe Policy (as an appendix)
 - II. Code of Conduct (as an appendix)
 - III. Behavioural expectations
 - IV. Reporting obligations and procedures
 - V. Complaint resolution
- Staff performance reviews to be undertaken annually with included topic focus on child safety.
- All employees have a responsibility to monitor one another and must report any suspicious behaviour or breaches of organisation rules.
- All hosts must receive a Host Handbook (Appendix J) which must contain (at minimum);
 - I. Child Safe Policy (as an appendix)
 - II. Hosting Code of Conduct (as an appendix)
 - III. Reporting obligations, procedures and policy
 - IV. Child Safety responsibilities while hosting
 - V. Phone numbers to report a disclosure or concern
 - VI. Behavioural expectations of our students
- SOTW Ltd must make regular contact (at least once a month) with all host families to discuss the welfare of the student and any issues the family might be having.
- SOTW Ltd must have monthly staff meetings to discuss child safety and ensure all participating students have been contacted.

Risk reduction and management

SOTW Ltd recognises the importance of a risk management approach to minimising the potential for abuse or harm to occur and use this to inform our policy, procedures and practices in the following ways:

- Host and employee screenings must be undertaken thoroughly and prior to any involvement with children. For further details (see sections Staff Recruitment and Screening, and Host Recruitment and Screening)
- The House Assessment Form (Appendix Q) must contain a section to highlight all potential safety risks.

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- All potential safety risks must be safeguarded eliminated from the host residence before the student will be allowed to stay. If the potential risks are not safeguarded, then the house will be deemed unfit and the host family will no longer be allowed to participate in the program. Examples of this include:
 - A host family has a swimming pool. SOTW Ltd will ensure either a fence is around the pool or an adult is always present when the students are utilising the swimming pool.
- All students must have comprehensive travel insurance before departing their home country.

Physical contact with Children

- All adults associated with SOTW Ltd must avoid close physical contact with children and young people, even if the child is upset.
- Hand shaking and high-fives is permitted and should replace hugging or any other form of physical contact.

Reporting obligations (staff and volunteers)

- All staff and volunteers associated with SOTW Ltd (including host families) have a mandatory obligation to report any disclosure or suspicion of child abuse to the department of child protection and police. Furthermore, all staff and volunteers must be aware that a failure to disclose abuse can be a criminal offence and will not be tolerated.
- All adults associated with SOTW Ltd must follow the relevant reporting legislations outlined in Reporting Guidelines and Response Procedures (see Appendix S).

Complaints

- Students, volunteers and staff must be aware of the Complaints Policy (Appendix C) and how to access it/use it.
- Complaints processes should be accessible on the SOTW Ltd website and via hard copy and email on request.
- All complaints must be responded to within 24 hours and appropriate action to be taken within 48 hours. SOTW Ltd staff or volunteers will contact the student who made the complaint via phone and request the student to advise a time that would be suitable after school hours to have a conversation on the phone or to meet in person with a representative from SOTW Ltd.
- If a complaint is made that involves the safety of a student, then immediate action must be taken to ensure the safety of that child is protected.

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- Staff must be trained in how to respond to a complaint appropriately and follow through even after resolution of the complaint.
- **All complaints must be taken seriously, responded to promptly and thoroughly, and reported accurately.**

Responding to and reporting issues/concerns/allegations/disclosure of abuse

All staff and local coordinators must take any disclosure of abuse from a child seriously and report and responding to this abuse must be immediate. Every issue, concern, allegation or disclosure relating to child abuse must be reported to the Child Abuse Report Line no matter how small or improbable it may seem.

A step by step guide is provided below:

- 1) Support child and/or ensure immediate wellbeing and safety
- 2) Call the Child Abuse Report Line (CARL) on 131 478 and report the incident and/or inform the appropriate state authority
- 3) Inform the child safety officer at SOTW Ltd and/or the Managing Director
- 4) Complete an incident report form
- 5) In conjunction with SOTW Ltd Head Office, outline the appropriate support that is to be provided to the child of concern and their family as well as relevant volunteers and employees

Internal investigations by SOTW Ltd will be conducted into staff and/or volunteer (including host family) related conduct. We will always wait for clearance from the Police and/or Child Protection before commencing internal investigations where the Police and/or Child Protection have been utilised. A step by step guide of the internal investigations are:

- 1) Managing Director will conduct a thorough review into how this host family, staff and/or volunteer was cleared to participate in SOTW Ltd's programs
- 2) If it relates to a host family, the Managing Director along with the relevant staff/volunteer will go through all clearances & host family screening forms to determine how this host family was allowed to host a student.
- 3) If the breach of the code of conduct does not result in a police matter, SOTW Ltd will accordingly red flag the family and not allow them to host students in the future.

See the Reporting Guidelines and Response Procedures for more information (Appendix S).

Confidentiality and privacy (including information storage)

- All personal information collected by SOTW Ltd must be stored in a secure operating environment that is not available to the public
- Personal information must not be disclosed to a third party or any other unauthorised personnel without written permission

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- A confidentiality agreement is included with the Employment Agreement (Appendix N) and must be signed to ensure any information obtained during employment is not retained, disclosed or used during and after termination of employment.
- Documents relating to child safety such as incident forms, records and reports made are stored in a secure operating environment that is not available to the public.

Document retention

- All documents must be saved on a server which is;
 - I. protected with staff passwords
 - II. kept in a secure location within the office
 - III. protected from hackers and viruses using anti-viruses, anti-malware and spyware protector.
 - IV. backed-up to a drop box each night
 - V. rebooted weekly
- SOTW Ltd office to be locked each night and protected with a security alarm system.
- Hard copy documents to be scanned and put in to server then shredded to destroy any information.
- All documents to be kept for 10 years and then subsequently archived indefinitely.

Definitions

Aboriginal and Torres Strait Islander - A person who is of Aboriginal or Torres Strait descent, identifies as Aboriginal or Torres Strait Islander and is accepted as Aboriginal or Torres Strait Islander by an Aboriginal or Torres Strait Islander community.

Abuse - Abuse is an act(s) or omission which endanger a child's health, wellbeing and/or development. It can be a single event or a series of traumatic events – cumulative. It is rarely limited to one form of abuse – multidimensional. Child abuse can have lifelong consequences.

Types of Abuse:

Physical Abuse - Physical abuse occurs when a child suffers or is likely to suffer significant harm from an injury inflicted by a child's parent or caregiver. This injury may be inflicted intentionally or may be the inadvertent consequence of physical punishment or physically aggressive treatment of a child. This may take the form of punching, beating, shaking ('accidentally harming' or otherwise harming a child).

Sexual Abuse - Sexual abuse occurs when a person uses power, force or authority to involve a child in any form of sexual activity. This can include both contact and non-contact behaviour. Behaviours sex offenders engage in may include:

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- I. Touching or fondling
- II. Obscene or suggestive phone calls/texts
- III. Exhibitionism and or voyeurism
- IV. Pornographic images
- V. Penetration with penis, finger, or other objects into the mouth, anus or vagina.

Emotional Abuse - Emotional abuse occurs when a child's parent or caregiver repeatedly rejects the child or uses threats to frighten the child. This may involve:

- I. Being repeatedly rejected, name called or being put down.
- II. Being frightened by threats
- III. Continual coldness to the extent that it significantly damages the child's physical, social, intellectual or emotional development.
- IV. Can involve repeated exposure to family violence.
- V. Emotional abuse is very commonly associated with neglect.

Exposure to family violence - Family violence is behaviour by a person towards a family member that is:

- I. Physically or sexually abusive
- II. Emotionally (psychologically) abusive
- III. Coercive or in any way controls or dominates the family member and causes that family member to fear for their safety or wellbeing or that of another family member.
- IV. Behaviour by a person that cause child to hear or witness or otherwise be exposed to the effects of, behaviour referred to above.

Family violence is often very well hidden by those involved.

Neglect - Neglect is a failure to provide for the child's basic needs for life.

- I. Food
- II. Clothing
- III. Shelter
- IV. Medical attention
- V. Supervision or care

To the extent that the child's health and development are, or are likely to be, placed at risk.

This has a high potential to occur in host families if they do not 'like the child'.

Grooming - Many perpetrators of sexual offences against children purposely create relationships with children and young people, their families and carers in order to create a situation where abuse could occur.

Grooming concerns predatory conduct undertaken to prepare a child for sexual activity. For example:

- I. Spending social time with a child e.g. in private settings, away from the organisation, online.
- II. Isolating the children or young person from family and peers.
- III. Giving gifts to a child.

- IV. Showing favouritism.
- V. Allowing the child to step out of boundaries or rules.
- VI. Touching the child.
- VII. Testing and breaking professional boundaries.

Adult - a person 18 years of age or older and includes persons who are staff, volunteers and associates of SOTW Ltd.

Child - Any person under the age of 18.

Child Safe - refers to an organisational environment that has an open and aware culture, understands child abuse, is supported by well-known child safety policy, promotes the empowerment and participation of children, manages child safety risks; and expects all stakeholders to report all allegations, disclosures or concerns. Child safety encompasses matters related to protecting all children from child abuse and neglect, intervening early where concerns arise, preventing abuse where possible, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse. Child safety includes **cultural safety** for children.

Child Protection – refers to legislation, statutory authority responsible for child protection, and all measures taken to minimise the risk of child abuse. Child protection is a core part of the broader, over-arching concept of child safety.

Code of Conduct – the SOTW Ltd policy which specifies behaviours expected of all staff, volunteers and directors in the organisation.

Cultural safety - the positive recognition and celebration of cultures. It is more than just the absence of racism or discrimination, and more than cultural awareness and cultural sensitivity. It is an environment which is socially and emotionally safe, as well as physically safe for children. It is about shared respect, shared meaning, shared knowledge and experience, of learning, living and working together with dignity and truly listening¹.

Culturally and/or linguistically diverse background (CaLD) – identification with particular cultural or linguistic affiliations by virtue of place of birth, ancestry or ethnic origin, religion, preferred language or language spoken at home or because of parents' identification on a similar basis.

Disability - any physical, sensory, neurological disability, acquired brain injury or intellectual disability or developmental delay that affects a child's ability to undertake everyday activities. A disability can occur at any time in life. Some disabilities may be obvious while others are hidden.

Disclosure - refers to a child telling someone (through words, drawings or actions) that he or she feels unsafe or has been harmed.

Employee/Staff Member – refers to any individual employed by SOTW Ltd.

Mandated Reporter – any adult who holds the following occupations is mandated to report child abuse to child protection authorities or police.

Reasonable grounds for belief - A reasonable belief is not the same as having proof. A ‘reasonable belief’ is formed when:

- A child states that they have been abused.
- A child states that they know someone who has been abused (sometimes the child may be talking about themselves).
- Someone who knows a child states that the child has been abused.
- Professional observations of the child’s behaviour or development leads a mandated professional to form a belief that the child has been abused.
- Signs of abuse leads to a belief that the child has been abused.

Visitor - a person who is not a volunteer, employee or associated student, who participates in, or is present at, any SOTW Ltd activity.

Volunteer - means an unpaid member of SOTW Ltd supporting program delivery or operations.

Reviewing the policy (review date and process)

- Policy to be reviewed annually and updated as needed.
- Managing director to read the policy and check all legislations are relevant and current.
- If any changes have been made throughout the year this should be reflected within the policy.
- The policy will be reviewed following any child safety related incidents and amended to reflect findings.

Related documentation

- Appendix A - Outbound Student Orientation Handbook
- Appendix B - Inbound Student Orientation Handbook
- Appendix C – Complaints Policy
- Appendix D - Complaints Form
- Appendix E – Consent Form
- Appendix F – Safety Card
- Appendix G – Student Behaviour Agreement
- Appendix H – Staff Handbook
- Appendix I – SOTW Ltd Code of Conduct
- Appendix J – Host Handbook
- Appendix K – Hosting Code of Conduct
- Appendix L – Employee Referee Check
- Appendix M – SOTW Ltd Child Safe Policy
- Appendix N – Employee Agreement
- Appendix O – Hosting Application Form
- Appendix P – Hosting Reference Check
- Appendix Q – House Assessment Form
- Appendix R – Hosting Interview Form
- Appendix S – Reporting Guidelines and Response Procedures
- Marketing and Recruitment Plan
- Student Homestay Application Forms – France, Italy & Spain
- Complaints Form for Students NSW / SA
- Incident Report Form
- School Expectation
- Privacy Policy
- Orientation Program for Inbound & Outbound Student (inc outbound programs from our partner agencies)



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