

CRITICAL INCIDENT POLICY AND PROCEDURE

PREAMBLE

The College recognises the duty of care owed to its students and staff and that planning for the management of a Critical Incident is essential. This Policy has been developed to reflect the College's commitment to look after its students and staff and comply with the National Code.

DEFINITIONS AND ACRONYMS

“**APC Group**” means the group comprising all the Colleges.

“**College**” means Australian Pacific College, English Unlimited and Australian Pacific Travel & Tourism, as the context may require.

“**Critical Incident**” is a traumatic event, or the threat of such (within or outside Australia) which causes extreme stress, fear or injury that could affect the student's ability to undertake or complete a course or, in the case of staff, could affect the staff member's ability to work, and any other event as determined by the PEO. This may include but is not limited to:

- a) serious injury, illness or death of a student or staff;
- b) students or staff lost or injured on an excursion;
- c) a missing student;
- d) severe verbal or psychological aggression and/or assault;
- e) physical assault, including sexual assault;
- f) student or staff witnessing (or being a part of) a serious accident or incident of violence;
- g) natural disaster e.g. earthquake, flood, windstorm, hailstorm or extremes of temperature;
- h) fire, bomb threat, explosion, gas or chemical hazard;
- i) data breach (refer to Data Breach Response Plan v1.0);
- j) social issues e.g. drug use, domestic abuse;
- k) pandemics or epidemics;
- l) an event which would have a substantial impact on the operations of the College

“**Critical Incident Team Leader**” means the PEO or a nominee of the PEO. The delegate must keep the PEO and Executive Committee informed of the Critical Incident.

“Critical Incident Committee” may include:

- i) the Critical Incident Team Leader;
- ii) staff members from each of the business units;
- iii) at least two (2) members of the Executive Committee of the College;
- iv) homestay coordinator; and
- v) the relevant Campus Director/Manager/Coordinator who is onsite and is also a WHS representative.

“Critical Incident Register” means the register of all critical incidents which occur. Campus directors and/or managers are responsible for maintaining and updating the register at their respective campus(es).

“DHA” means the Department of Home Affairs.

“National Code” means the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

“PEO” means the Principal Executive Officer of the APC Group.

“Policy” means this Critical Incident Policy and Procedure.

“PRISMS” means the Provider Registration and International Student Management System.

1. REPORTING OF CRITICAL INCIDENTS

1.1 All Critical Incidents must be reported to the Critical Incident Team Leader.

1.2 The Critical Incident Team Leader will, as the circumstances require, determine the members of the Critical Incident Committee and notify members. For the avoidance of doubt, the Critical Incident Committee should consist of members who are appropriate for the circumstances of the Critical Incident.

2. CRITICAL INCIDENT COMMITTEE

2.1 The Critical Incident Committee shall assist the Critical Incident Team Leader in the management of Critical Incidents involving staff and/or students either directly or indirectly at the College or off campus.

2.2 The responsibilities of the Critical Incident Committee include:

- i) risk assessment of the incident which may require emergency action;
- ii) analysis of requirements to address the incident;
- iii) establishment of liaison with all relevant emergency services e.g. police, fire brigade, ambulance, hospital, poisons information centre, community health services;
- iv) 24 hour access to contact details for all students and their families, agents, homestay families, carers, consular staff, embassies and interpreting services if necessary;
- v) 24 hour access to contact details for all relevant staff members needed in the event of a critical incident e.g. welfare officer, legal services, school security, homestay coordinator;
- vi) development of a Critical Incident plan for each Critical Incident identified;
- vii) dissemination of planned procedures;
- viii) organisation of practice drills;
- ix) regular review of the Critical Incident plan(s);
- x) assisting with implementation of the Critical Incident plan;
- xi) arranging appropriate staff development; and
- xii) budget allocation for emergencies.

3 CRITICAL INCIDENT PLANS

3.1 All Critical Incident plans assign responsibilities among relevant staff members (as determined by the Critical Incident Team Leader and the Critical Incident Committee). The Critical Incident Team Leader or nominee shall be responsible for preparing the Critical Incident plan.

3.2 A Critical Incident plan will depend on the circumstances of the Critical Incident. Each Critical Incident Plan will be unique and tailored to the situation facing the College at that time. Appendix 3 of this Policy provides examples of matters which may be contained in a Critical Incident plan.

3.3 All Critical Incident Plans should consider and may include the following:

- a) identification of the Critical Incident and the persons involved;
- b) gathering of relevant information and the preparation of a Critical Incident Report;
- c) assignment of management and duties to relevant staff;

- d) how information is to be disseminated;
- e) preparation of media response (if required);
- f) consideration of ongoing support (physical, mental and educational) for those involved;
- g) how/when normal function of the College can resume; and
- h) review of the Critical Incident Plan, Critical Incident Report and the effectiveness of the plan.

3.4 The College acknowledges that there will be occasions when there is no time to prepare a Critical Incident Plan, On such occasions, where staff and/or students may be harmed, then the focus of action shall be to minimise harm and/or loss of life.

4. RESOURCES

The nature of Critical Incidents is such that resources cannot always be provided in anticipation of events. The Critical Incident Committee uses its discretion to provide adequate resources – both physical and personnel – to meet the needs of specific situations. Staff will be reimbursed for any out-of-pocket expenses.

5. MANAGING THE MEDIA AND PRIVACY

5.1 The PEO should:

- a) handle all media calls and manage access of the media to the scene, and to staff, students and relatives;
- b) determine what the official College response will be;
- c) check all facts before speaking to the media;
- d) explain that questions cannot be answered at certain times, if accurate information is unavailable or the issue is of a sensitive nature; and
- e) avoid implying blame or fault for any part of the Critical Incident as this can have significant legal implications.

5.2 The PEO may delegate media liaison to another member of staff.

5.3 The procedures followed by the College and the student/staff's rights to privacy of their personal information are at all times protected by and subject to the relevant privacy laws and the College's Privacy of Information Policy.

5.4 Student and staff information may be shared amongst the College and external agencies under circumstances as needed to ensure the safety and wellbeing of the student/staff member and other students/staff members and the wider community. Such information shall only be shared, taking into

account relevant privacy laws, the Information Privacy Principles and the College's Privacy of Information Policy.

6. POLICY REVIEW

This Policy will be reviewed as part of the three (3) year cycle of review or as required by legislative changes, or as a result of findings by the Critical Incident Committee in meetings following a Critical Incident.

RELEVANT LEGISLATION

This document references the following legislation, regulations, codes and standards:

Relevant Legislation/codes/standards	
Commonwealth	National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth) Education Services for Overseas Students Act 2000 (Cth) Privacy Act 1988 (Cth)

RELATED POLICIES AND PROCEDURES

This document references the following College policies and/or procedures:

Related Policies and Procedures	
Policies	Emergency Plan and Evacuation Policy v2.0 Privacy of Information Policy v3.3 Data Breach Response Plan v1.0

KEYWORDS

Keywords	Critical Incident, emergency, trauma, threat, Critical Incident Report, Critical Incident Plan
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POLICY/PROCEDURE HISTORY

Policy History			
Current version	Current version release date	Author	Description of changes
Critical Incident Policy and Procedure v1.5R	16 April 2015	Sharon Luhr	Original Document
Critical Incident Policy and Procedure v1.6	Never released	Sara Gaudry	Revised version of v1.5R, which was then further revised and superseded by v1.7R.
Critical Incident Policy and Procedure v1.7R	February 2019	Sara Gaudry	Full update in accordance with the Policy and Procedure Template v1.0, Guidelines for Drafting Policies and Procedures v1.0 and the National Code 2018

APPENDIX 1

CRITICAL INCIDENT REPORT

(To be completed after all Critical Incidents)
(to be kept on the affected student(s) file and in the Critical Incident Register)

Date:

College staff name:

Position:

Brief summary of incident: include where, when, who, and why as appropriate.

Further information/documentation should be attached (including the information gathered as per clause 2.2(b) of this Policy, any media releases, minutes of all Critical Incident Committee meetings relating to the Critical Incident and any correspondence received or entered into as a result of the Critical Incident for example medical, consular, legal, government departments, family, and/or homestay).

Immediate action taken:

Further action required:

Persons or staff notified and time & date of notification:

Signature:
Name:

Date:

APPENDIX 2

CRITICAL INCIDENT REPORT CHECKLIST

(To be completed after all Critical Incidents and with consideration and reference to the Example
 Critical Incident Plan attached to this Policy as Appendix 3)
 (to be kept on the affected student(s) file and in the Critical Incident Register)

ACTION	ASSIGNED TO / DATE ASSIGNED	DATE COMPLETED
Identification of the Critical Incident and the persons involved.		
Gathering of relevant information and the preparation of a Critical Incident Report.		
Assignment of management and duties to relevant staff.		
How is information to be disseminated?		
Preparation of media response (if required).		
Consideration of ongoing support (physical, mental and educational) for those involved.		
How/when normal function of the College can resume?		
Review of the Critical Incident Report and the effectiveness of the plan.		

Signature:
Name:

Date:

APPENDIX 3

EXAMPLE OF INFORMATION TO INCLUDE IN A CRITICAL INCIDENT PLAN

1. **Immediate Action (within 24 hours) of a Critical Incident.**
 - a) Is the person still in danger or at risk?
 - b) The person who is initially notified of the Critical Incident should notify the Critical Incident Team Leader as a matter of urgency (even if this occurs outside of College hours) and identify the nature of the Critical Incident.
 - c) The person, who is initially notified of the Critical Incident, should obtain as much information as possible and document this information for future reference, regarding the nature of the Critical Incident. For example:
 - i. Where did the incident occur - on campus or off?
 - ii. How severe is the nature of the incident?
 - iii. Are there students/staff directly involved?
 - iv. Where is the student/staff member now?
 - v. Is the student/staff member injured?
 - vi. Has an ambulance been called?
 - vii. Is an interpreter required?
 - viii. Is a fatality involved?
 - ix. Has there been a disruption to an Underage Students' accommodation and/or welfare arrangements.
 - d) This information should be attached to the Critical Incident report and placed on the relevant student(s) and/or staff member(s)' file. A copy of this information should also be kept in the Critical Incident Register.
 - e) Assignment of duties to College staff:
 - i. The Critical Incident Team Leader will identify the staff member responsible for any immediate action.
 - ii. The management of the Critical Incident will then be referred to the identified staff member.
 - iii. The responsible staff member should keep in close contact with the Critical Incident Team Leader and any other staff members as required.

f) Where practicable, implement the appropriate management plan or action strategy as noted below:

i) If the student is on campus:

- ensure appropriate intervention to minimise additional injury
- provide first aid where necessary
- ascertain seriousness of injury
- call ambulance if required
- if ambulance is required, accompany student to hospital
- ascertain seriousness of injury from hospital staff
- if ambulance is not required accompany student to relevant medical service e.g. doctor

ii) If the student is off-campus

- if situation appears serious, call emergency services and meet the emergency services team at the student's location
- otherwise go to location of student
- provide first aid where necessary (this should be done by one of the qualified first aid officers)
- ascertain seriousness of injury
- call ambulance if required
- if ambulance is required, accompany student to hospital
- ascertain seriousness of injury from hospital staff
- if ambulance is not required accompany student to relevant medical service e.g. doctor

iii) If the student has already been taken to hospital

- contact the hospital
- ascertain seriousness of injury from hospital staff,

iv) If the student(s) has/have been emotionally affected by an event external to the College, State or Country (ie international disaster, act of terrorism):

- identify and contact those students/staff affected
- assess the needs of those students/staff for counselling or arrange travel arrangements to return home

v) If the Critical Incident involves more than one student or an entire campus

- or campuses refer to the Emergency Plan and Evacuation Policy v2.0
- vi) If the Critical Incident involves a data breach refer to the Data Breach Response Plan v1.0.
 - vii) If the Critical Incident has disrupted an Underage Students accommodation and/or welfare arrangements, alternate accommodation and/or welfare arrangements must be made immediately. This may be temporary depending on the circumstances of the Critical Incident The College must ensure that there is continuity of care for the student at all times as required under the College's Accommodation and Welfare Policy for Under 18 year old Students and the National Code.
- g) Dissemination of information to parents and family members:
- i) When there are a number of people to contact, (eg: such as when a student is in a homestay), the College should attempt to simultaneously contact all parties.
 - ii) Contact the parents/legal guardian of the student.
 - iii) Contact the carer of the student e.g. they may be living with a relative.
 - iv) Contact the homestay family of the student.
 - v) Contact the student's education agent.
 - vii) If information is available contact the police or relevant consular staff
- h) Completion of a Critical Incident report [see appendix A to this Policy]
- i) Prepare a media/social media response, considering all factual information, and an information release for students and staff if required. These responses/releases/information must be conveyed to the Critical Incident Team Leader. Any contact with the media, social media or students must be done by the Critical Incident Team Leader or their appointed spokesperson.
 - j) Assess the need for support and counselling for those directly and indirectly involved and arrange such support and counselling as required (this includes staff and students).
 - k) If the student is seriously injured or requires hospitalisation, the College should enlist aid of overseas consular staff to assist the family if they are travelling to Australia, with interpreting services to aid in communication with the relevant medical services and with counselling services if required.
- 2. Additional Action (48 – 72 hours) after the Critical Incident**
- a) Assess the need for support and counselling for those directly and indirectly involved (ongoing) (this includes staff and students).

- b) Provide staff and students with factual information as appropriate. Depending on the nature of the Critical Incident, it may be appropriate for the Principal Executive Officer or delegate to address the College and inform them of the facts of the incident and the condition of the student concerned.
- c) Restore normal functioning and College school delivery as soon as possible. Where the Critical Incident occurred on College premises, there will be other procedures to follow in relation to any possible safety issues and the College's legal obligations. Consideration and action should also be taken to ensure continuation of the student(s) welfare (this could include alternative accommodation). The Critical Incident Committee should identify the appropriate staff member to follow up these issues.

3. Follow-up – monitoring, support, evaluation

- a) Identification of any other people who may be affected by the Critical Incident and access support services for affected College staff or students. The effects of traumatic incidents can be delayed in some people. The College needs to be aware of any emerging need for support and/or counselling.
- b) Maintain contact with any injured/affected parties.
- c) If the student is in hospital for some time, the College needs to maintain contact with the student and their family in relation to:
 - i) Support and assistance for the student and family;
 - ii) Depending on the condition of the student, the College could provide study materials for the student to enable them to remain in touch with College activities; and
 - iii) Discuss with the family any required changes to the enrolment of the student e.g. suspension or cancellation of enrolment and make any changes required on PRISMS.
- d) The College should also contact DHA and inform them of the incident using the course variation function in PRISMS in the event that suspension or cancellation of their visa is required.
- e) Provision of accurate information to staff and students where appropriate. Depending on the nature of the Critical Incident, it may be appropriate for the Principal Executive Officer or delegate to address the College and inform them of the facts of the incident and the condition of the student concerned.

- f) A Critical Incident Committee meeting should be held to evaluate the Critical Incident report and the effectiveness of the Critical Incident Plan and to make modifications if required. If appropriate, this process should incorporate feedback from staff, students and external emergency services/government departments that were involved. In addition they should identify any possible longer term effects on the College, staff and student well-being e.g. inquests, legal proceedings etc. The Critical Incident Committee will collate all information/records/reports relating to the Critical Incident and maintain these records in the Critical Incident Register for at least two years after the student ceases to be an accepted student of the College.

APPENDIX 4

CRITICAL INCIDENT EMERGENCY NUMBERS

POLICE 000
AMBULANCE 000
FIRE 000

- 1. DIAL 000 AND REQUEST THE SERVICE YOU NEED**
- 2. REMEMBER TO REMAIN AS CALM AS YOU CAN**
- 3. SPEAK CLEARLY AND GIVE THE REQUESTED DETAILS**

TYPE OF SERVICE	NAME OF SERVICE	TELEPHONE NO.
AIDS advice & counselling	AIDS Council of NSW	(02) 9206 2000
	Victorian AIDS Council	1800 134 840
	Queensland AIDS Council	(07) 3017 1777
Abortion counselling	Family Planning NSW Talkline	1300 658 886
	Family Planning Victoria	1800 013 952
	Pregnancy Helpline Queensland	1800 090 777
Australian Search & Rescue	Aviation Search and Rescue	1800 815 257
	Maritime Search and Rescue	1800 641 792
Coroners Office	NSW Coroner's Court	(02) 8584 7777
	Coroners Court of Victoria	1300 309 519
	Coroners Court of Queensland	(07) 3239 6193
Department of Home Affairs	Enquiry Line	13 18 81
Domestic Violence	Domestic Violence Line	1800 656 463

Gambling	Gambling Help NSW	1800 858 858
	Victorian Responsible Gambling Foundation	1800 858 858
Grief Counselling	Beyond Blue	1300 224 636
	Lifeline	13 11 14
Australian National Security	National Security Hotline	1800 123 400
Sexual Assault	NSW Sexual Assault Service	(02) 9462 9266
	Victims of Crime (Victoria)	1800 819 817
	1800RESPECT	1800 737 732
Poison Information	Poisons Information Centre	13 11 26
Pregnancy Care	Pregnancy, Birth and Baby	1800 882 436
Suicide Help	Lifeline	13 11 14
	Kids Helpline	1800 551 800
	Mensline Australia	1300 789 978
	Suicide Call Back Service	1300 659 467
	Beyond Blue	1300 224 636
	Headspace	1800 650 890