Critical Incident Policy

Policy Code: STU-062   **Version:** 8.0   **Effective Date:** 19 August 2020

Purpose

The purpose of this policy and its related procedures and guidelines is to identify the personnel, structures and procedures for managing a critical incident.

Providers of education to overseas students are required by legislation to have documented critical incident policy and procedures, which outline the action to be taken in the event of critical incident. This includes the initial response, follow-up, reporting, review and improvement.

Definition of "College" – *The Australian College of Natural Medicine Pty Ltd (ACNM) trades as Endeavour College of Natural Health and FIAFitnation. For the purpose of this policy, any reference to 'College' or 'the College' should be considered a reference to each or any of these respective trading names / entities.*

Definition **of "International students"** – *The College defines an International Student as someone* ***who is not an*** *Australian citizen or permanent resident or a New Zealand citizen or a permanent visa holder. This definition includes students studying onshore on a range of temporary visas (working holiday visa, tourist visa, student visa etc) or offshore as an online student. Information that applies only to students studying on specific visa classes (e.g. Student Visa) is specified when relevant. It should be noted that all international students pay fees specified for international students, regardless of visa subclass.*

Scope

- All campuses
- Any location (worldwide) where College staff are engaged in College business
- Any location (worldwide) where students of the College are engaged in learning activities
- All full time, part time and sessional staf, casual staff and contractors
- All students – domestic and international
- All visitors

Policy Statement

A **Critical Incident**: is any sudden or progressive development (event) which requires immediate attention and decisive action to prevent / minimise any negative impact on the health and welfare of one or more individuals. Critical incidents may include (but are not limited to) events such as:

- Death / suicide
- Serious accident or injury
- Death or serious illness of a student's family or friends overseas (from their homeland)
- An absent or 'missing' international student whereby the student has not attended class and is not contactable for a certain period of time
- Deprivation of liberty, threats of violence, assault, rape / sexual assault, aggravated burglary, biological or chemical weapons

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- Fire, bomb, explosion, gas / chemical hazards, discharge of firearms

- Threat of widespread infection or contamination (e.g. declaration of pandemic)

- Civil unrest

- Natural disasters

- Serious damage to essential facilities

- Disruption to operations of the College

- Any incident which occurs on a College campus which causes or has the potential to cause physical or psychological harm to staff, students, clinic clients or anyone on site (including suicide ideation)

- Information which has the potential to negatively affect the reputation of the College in the media and / or wider community.

Where College staff witness an event that may be considered a critical incident, or where staff are aware of an event which may either indicate or escalate to a critical incident, the relevant *Critical Incident Procedures* must be followed.

Students and staff are made aware on orientation of the Safe Campus processes at the College, including:

- Any incident should be reported immediately to a member of staff or (preferably) the local Student Services team.

- If the incident is sensitive in nature to any party, it can be reported directly through a dedicated email address: safecampus@endeavour.edu.au.

The following table provides a guide to determining the severity of critical incidents:

LEVEL OF RISK:	DETERMINED BY:	EXAMPLES:
SEVERE (Emergency services required)	MD OR Director of Education OR Director, Student Services & Retention OR Director of Clinic & Campus Operations OR Campus Manager	- Death, suicide, or life- threatening injury / situation - Deprivation of liberty, threats of violence, assault, sexual assault, aggravated burglary, use of firearms, biological or chemical weapons - Fire, bomb, explosion, gas / chemical hazards - Threat of widespread infection or contamination (e.g. pandemic) - Natural disaster (e.g. flooding, cyclone, bush fire)
SIGNIFICANT (Emergency Services required)	MD OR Director of Education OR Director, Student Services and Retention OR Director of Clinic & Campus Operations OR National Quality, Governance & Compliance Manager OR Campus Manager	- Severe work health and safety risk - Serious injury incurred by staff / student - Anaphylactic episode for staff / student - 'Missing' international student
MODERATE	MD OR	- WHS risk

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LEVEL OF RISK:	DETERMINED BY:	EXAMPLES:
(Emergency Services MAY be required)	Director of Education OR Director, Student Services and Retention OR Director of Clinic & Campus Operations OR Campus Manager	- Suspicious package left unattended - IT system crashes - Epileptic fit - Psychological or mental health breakdown (could include threat of suicide) - Physical incident involving a student / staff member with a self-disclosed notifiable disease
MINOR (Emergency Services NOT required)	All Staff All Designated Workplace First Aid Officers	- Minor injury - Plumbing blockages - Phone / Electrical failure - Computer system or network breakdown

Designated Officer

Any College staff member who is either a witness to, or first to be informed about an actual or potential critical incident is referred to as the 'Designated Officer'.

The Designated Officer is to assume responsibility for alerting the most senior College staff member available as soon as possible who, in turn, will re-assess the situation and convene a Critical Incident Team if deemed necessary.

The Designated Officer may need to assume temporary control of a critical incident site and assign duties to available persons (such as calling emergency services, alerting other staff, assisting with first aid, crowd control etc.), until such time as relieved by either the Critical Incident Team or Emergency Services.

Critical Incident Team

The Critical Incident Team is responsible for managing the College's **response** to any critical incident which is considered to have a severe or significant level of risk or in some cases, moderate level of risk.

This team is convened by the most senior member of staff available at the time of the incident and will convene as soon as possible to plan an immediate response, allocate responsibilities and determine ongoing strategies.

Once the team is convened, the most senior staff member available becomes the **Head of the Critical Incident Team**, or assigns a suitable alternative to head the team.

The team will be composed of the following members of staff:

- Managing Director
- Director, Student Services & Retention (or nominee)
- Director of Clinic & Campus Operations (or nominee)
- Director of Education (or nominee)
- National Human Resources Manager (or nominee)
- National Quality, Governance & Compliance Manager (or nominee)
- Others as deemed appropriate by the Head of the Critical Incident Team (e.g. CFO, General Manager VET, National Property Manager, Campus Manager/s, Clinic Manager/s).

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Where Emergency Services assume management of the critical incident, the Critical Incident Team will liaise with the managing body (e.g. Police Service or Fire and Emergency Services) for a coordinated approach to any response activities.

In the event that members of the Critical Incident Team are not available, the Managing Director has delegated responsibility for making decisions relating to ay incidents affecting the business of the College.
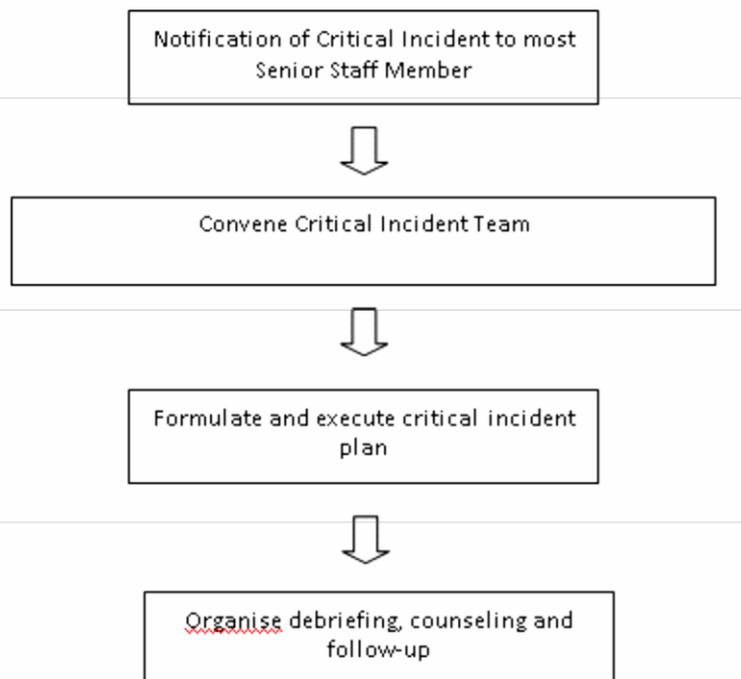
Responsibilities of the Critical Incident Team

The team's duties include, but are not limited to:

- preparing a *Critical Incident Initial Report* outlining details such as the type of incident, the exact location and details of any person or persons who might be injured, in distress, or at risk

- reviewing the situation, setting priorities, allocating tasks / responsibilities and coordinating an immediate response including communications (to staff, students, families of those involved, helpers, and the media)

- organising ongoing response / follow up (including staff and student briefing, counselling, review and reporting)

- de-briefing to evaluate response procedures and make recommendations for handling future critical incidents.

This is summarised in the following diagram:

Critical Incidents Reporting and Procedure Flow Chart

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┌─────────────────────────────────┐
│ Notification of Critical Incident│
│   to most Senior Staff Member   │
└─────────────────────────────────┘
                 ⇩
┌─────────────────────────────────┐
│   Convene Critical Incident Team │
└─────────────────────────────────┘
                 ⇩
┌─────────────────────────────────┐
│  Formulate and execute critical │
│         incident plan           │
└─────────────────────────────────┘
                 ⇩
┌─────────────────────────────────┐
│  Organise debriefing, counseling │
│        and follow-up            │
└─────────────────────────────────┘
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Note: This section only applies to student visa holders

Absent International Students

Where an international student is studying on a **student visa**, the College has a duty of care to ensure the student is safely in Australia and remains compliant with the conditions of their visa (where appropriate). As such, an international student may be classified as 'missing' if:

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- The student is newly enrolled in an award course and due to start in their first study period on campus but has not arrived to their first week of classes.

- The student is a continuing student and has not re-enrolled in any subjects for the next study period and has not responded to any contact regarding enrolment by the end of the first week of that study period.

- The continuing student has enrolled in subjects but has not attended any classes on campus for two weeks without notice (at any point in the study period)

- It is brought to the attention of any staff member (academic or operational) that the student may be 'missing' either by another student, agent, or family member.

If an international student is classified as 'missing', the staff member responsible for identifying this situation is to immediately contact the National Quality, Governance and Compliance Manager and the Director, Student Services and Retention. Steps will then be taken to contact the student directly and could include (but are not limited to):

- Phone calls

- Emails

- Formal written letters

- Home visits to the last known address

- Requesting the agent to contact the student.

If the student's welfare is of concern, the College reserves the right to contact the student's agent, listed next-of-kin and / or emergency contact in order to ensure the student is safe. The College will also contact the Police at this stage to request a home visit to check on the student's welfare.

If the student has not responded to any contact after seven (7) days of being classified as 'missing', the student will be reported to the Department of Human Affairs (DHA) through the PRISMS database and the student's next-of-kin and the Police may be notified of the student being officially 'missing'.

Further information on the process when an international student has been classified as 'missing' can be found in the *Critical Incident Procedure – Significant*.

Records of any critical incident which specifically involves an international student on a personal level will be kept on the student's file (including incident details and remedial action taken) for at least two (2) years after the student ceases to be an accepted student at the College.

Definitions

Award course: a formally accredited and approved program of study which can lead to a qualification granted by the College.

HE: Higher Education

Health: the state in which an individual does not suffer from any disease or injuries as a result of work, work activities or the work environment.

PRISMS: Provider Registration and International Student Management System, database used by providers and government departments for management of international students.

Safety: the state in which the risk of harm (to persons), damage to property or the environment is limited to an acceptable level.

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Student / Learner: an individual person who is formally enrolled to study at the College. The individual person is that who appears on the College's documents such as enrolment, admission and payment documents, and who is assigned an individual student ID.

Study Period: A "study period" is defined in the *National Code 2018* as "a discrete period of study" in a course, namely, semester, short course or as otherwise defined by the College as long as that period does not exceed 24 weeks". This will normally reflect the period during which the student can normally be expected to complete a group of units / subjects. A study period may also refer to the delivery period of an online subject.

Related Procedures

Critical Indicent Procedure - Minor

Critical Incident Procedure - Moderate

Critical Incident Procedure – Severe

Critical Incident Procedure – Significant

Further Information

Related Policies

Health and Safety Responsibilities and Accountability Policy

Notifiable Diseases and Infection Control Policy

Risk Management Framework Policy

Related Documents

Critical Incident Initial Report

Guidelines

Not Applicable

Benchmarking
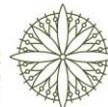
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Supporting Research and Analysis

Not Applicable

Related Legislation

The Education Services for Overseas Students Act 2000 (ESOS Act)

National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018 (National Code 2018)

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Review and Approval

Policy Author

National Compliance Manager

Policy Owner

Director of Clinic and Campus Operations

Contact

Director of Clinic and Campus Operations

Sherri.duncan@endeavour.edu.au

Approval Body

Managing Director

Meeting date: 09 March 2020

Policy Status

Fully revised

Responsibilities for Implementation

- Managing Director
- Campus Managers
- Director of Clinic & Campus Operations
- Director of Education
- Director, Student Services & Retention
- Head of Marketing
- National Quality, Governance & Compliance Manager

Key Stakeholders

- Managing Director
- All staff
- All students
- Campus Managers / Campus Coordinators
- Communications Manager
- Director of Clinic & Campus Operations
- Director of Education
- Director, Student Services & Retention
- General Manager, VET
- Head of Marketing

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- National Quality, Governance & Compliance Manager
- Senior Leadership Team

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