CRITICAL INCIDENT PROCEDURE

Section 1 - Purpose and Scope

(1) This Procedure implements the Critical Incident Policy by setting out:
   a. examples of events that are likely to be considered a 'critical incident', and their level of risk;
   b. key roles and responsibilities in managing a critical incident; and
   c. specific actions that apply to "missing" international students only (clauses 25 – 31).

(2) This Procedure applies to students, staff, contractors and visitors when affected by a critical incident concerning the College.

(3) Contact details for organisations able to respond to an emergency or critical incident are set out at Attachment C (**critical incident contacts**).

Section 2 - Definitions

(4) In addition to the definitions set out in the Policy:

Critical Incident Officer means nominated officers on campus with responsibility to immediately handle a critical incident.

Critical Incident Plan means the plan prepared by the Critical Incident Team setting out the College response to a critical incident.

Critical Incident Team means the team appointed to respond to a critical incident.

First Responder is the person who is aware of, or immediately responds to, a critical incident or emergency. In most situations, this is expected to be a Critical Incident Officer or other staff member, but may also be a student or visitor to the campus.

International student means a student studying in Australia on a temporary student visa granted by the Australian government (usually Student subclass 500 visa).

Senior Management Team means the advisory body to the Chief Executive Officer (CEO) consisting of the senior managers involved in the day-to-day running of the College.

Section 3 – Procedure

(5) Some examples of critical incidents that give rise to the management response in line with the Critical Incident Policy and this Procedure include:
   a. Death / suicide

b. Attempted suicide or self-harm
c. Serious accident or life-threatening injury/illness
d. "Missing" international student
e. Severe physical, verbal or psychological aggression
f. Deprivation of liberty; actual or threats of violence (including domestic violence), physical assault, rape/sexual assault or other abuse; aggravated burglary, or presence or use of biological or chemical weapons
g. Child protection matter
h. Fire, bomb threat, explosion, exposure to gas/chemical hazards or discharge of firearms
i. Natural disaster (for example cyclone, earthquake, or flood)
j. Threat of widespread infection or contamination
k. Civil unrest
l. Serious damage to essential campus facilities
m. Notifiable data breach or cyber security threat
n. Information which has the potential to negatively affect the reputation of the College in the media and/or wider community
o. Any critical incident affecting students or staff while representing the College.

(6) Attachment B sets out the level of risk categorisation for different types of critical incidents (severe, significant or moderate). The CEO may determine that a specific incident is to be managed with a different level of risk categorisation.

Roles and responsibilities

(7) All **staff** should be aware of the processes for managing critical incidents and dealing with emergencies (such as emergency evacuation of the campus premises). Staff may be the **First Responder** to deal with an emergency on site, until their responsibilities are relieved by Emergency Services, the Critical Incident Officer or a senior manager.

(8) The **Critical Incident Officer** has responsibility for liaising with campus security and/or Emergency Services, and immediately controlling the situation until such time as:
a. Emergency Services assumes management of the incident (where relevant);
b. the incident is controlled; or
c. another person assumes management of the incident pursuant to clause 9.
d. The Critical Incident Officer is also responsible for documenting and reporting the incident to the CEO, the Critical Incident Team (if established) or most senior manager available at the time.

(9) The CEO or a nominated senior manager may assume management of a critical incident at any time. In some instances, a critical incident may be referred to an external authority (e.g., Police, State Emergency Services, Ambulance Services) for management.

(10) A **Critical Incident Team** may be established by the CEO or most senior manager available at the time. The purpose of the Critical Incident Team is to develop and implement a **critical incident plan** to respond to the incident.
   a. The **Senior Management Team** may operate as the Critical Incident Team, particularly when dealing with critical incidents categorised as 'severe' or 'significant' (see Attachment A).
   b. Membership of a Critical Incident Team will depend on the nature of the incident, portfolio relevance/impact and capacity to provide input.
   c. Where appropriate, the CEO may invite external expertise to participate (for example, IT consultant for responding to notifiable data breach or cyber security breach).

(11) The responsibilities of a Critical Incident Team include but are not limited to:
   a. Reviewing the situation, setting priorities, allocating tasks/responsibilities and coordinating the immediate response including required communications (to students, staff and others as part of its **critical incident plan**.
   b. Completing the ***Critical Incident Form***, outlining details such as the type of incident, the location and details of person/s involved (such as injuries, concerns about well-being etc); immediate strategies taken to respond to incident (for example, hospitalisation, counselling services offered to witnesses etc).
   c. Organising ongoing responses/follow-ups (such as student and staff briefings, review and reporting).
   d. De-briefing to evaluate the response processes.
   e. Developing recommendations to improve College responsiveness for future critical incidents (if required) for consideration by the CEO and Senior Management Team
   f. Providing relevant records for the Critical Incident Register (through the CEO and Compliance Officer).
   g. Preparing reports and submitting reports as required (Work Health Safety Committee and/or Risk and Audit Committee).

(12) Where a Critical Incident Team is not established, the CEO may nominate a Senior Management Team member to take responsibility for the above tasks as relevant (including recording and reporting the incident).

(13) In addition to the tasks already stated, the **CEO** is responsible for:
   a. responding to any media queries in relation to the critical incident; and

b. reporting all critical incidents categorised as '**severe**' or '**significant**' (see Attachment A) to the Risk and Audit Committee and to the Board of Directors, and provide these bodies with information about follow-up strategies and resources that may be required; and

c. ensuring relevant Senior Management Team members review and assess their portfolio's response to the critical incident and what changes are needed to improve the College's responsiveness to similar incidents in the future.

Managing a critical Incident

(14) The College recognizes that each critical incident and emergency is different. Below are steps that are likely to be taken in each phase of managing an emergency or incident. See also Attachment B.

Critical phase

(15) The most critical phase is immediately after (or during) the incident, or as soon as the College becomes aware of an imminent threat.

(16) The **First Responder** (where possible, a **Critical Incident Officer**) who first becomes aware of an incident should, using their best judgement:
a. Ensure that all individuals directly affected are safe.
b. Ensure that individuals needing medical supervision are receiving such in a safe environment as a priority.
c. Ensure that all other individuals are safe.
d. Contact the relevant Emergency Services and/or other authorities if required.
e. Report the incident to the CEO or the most senior member of staff.
f.   Ascertain what occurred and whether there are any residual risks.
g. Support other students and/or staff and arrange counselling if appropriate.
h. Address any other immediate needs: for example, additional support, police statements etc.
Note: These tasks may be undertaken by more than one person.

(17) As a priority, the **CEO or most senior member of staff** should:
a. Determine whether evacuation procedures need to be activated.
b. Contact the relevant Emergency Services and/or other authorities if required.
Note: Depending on the urgency of the incident, these actions may also be undertaken by the First Responder / Critical Incident Officer.

(18) The CEO or most senior member of staff may:
a. establish a Critical Incident Team or direct a senior manager to take equivalent responsibility; and /or
b. nominate a staff member to be the **Critical Incident Officer.**

(19) The CEO or the most senior member of staff is responsible for determining when College activities are to resume, by assessing whether the immediate danger has passed, or individuals are no longer in danger and receiving appropriate care.

Debriefing / investigation phase

(20) Where a critical incident is to be formally investigated by authorities (for example, the police in relation to a possible criminal matter), the College will cooperate to the fullest extent with those authorities. Subject to that, the Critical Incident Officer will:

a. support the Critical Incident Team in its review and reporting of the incident; and

b. document relevant information for the Critical Incident Team, including compiling the facts about the incident (such as witness statements, injuries to any person, information from the scene etc). This may be captured in written form or by taking photographs.

Reporting phase

(21) Reports are provided, as required:

a. The Critical Incident Team or relevant manager will report to:
     i. the CEO; and
     ii. the Work Health Safety Committee (if relevant).

b. The CEO will report all severe and significant critical incidents to the Risk and Audit Committee, and thereafter to the Board of Directors.

c. All external reporting will be coordinated through the CEO.

Confidentiality and record-keeping

(22) Internal documentation relating to critical incidents will be treated with the appropriate levels of confidentially. Access to and sharing of information is limited to those who require it for undertaking their responsibilities within the College, or as required by law.

At all times, the handling of personal information is set out in the Privacy Policy and Privacy Procedure, as well as the associated legislative responsibilities.

(23) Written records of critical incidents are handled as follows:

a. Details of a critical incident (including the completed *Critical Incident Form* and other evidence) are retained on the Critical Incident Register.

b. These records should contain a sufficient level of information to explain responses and decision-making so that:
     i. the grounds for determining an incident are clear; as well as
     ii. the actions taken to address it.

(24) All potential ongoing risks are captured in the relevant Risk Register.

International students

(25)   The College has a special duty of care to international students while they are studying in Australia. This includes ensuring that international students are made aware of potential risks while in Australia. A failure of an international student to maintain satisfactory course attendance may give rise to concerns about:

a. their safety and welfare; and/or

b. potential breaches of their student visa.

(26)   The College is required to ensure that international students studying on a student visa remain compliant with their visa's conditions.

(27)   An international student may be considered to be in potential breach of their student visa if they do not maintain satisfactory course attendance. As such, the College may consider an international student "missing" if:

a. They are a newly enrolled commencing student but have not arrived for their first week of classes.

b. They are a continuing student but have not re-enrolled in any units for the current study period and have failed to respond to contact by the end of that study period.

c. They are a continuing student but have not attended any classes on campus for two weeks without notice (at any time during that study period).

d. It is brought to the College's attention by a third person (such as another student, family member, friend etc) that the student may be "missing."

(28)   Staff members who first become aware that an international student may be "missing" must immediately contact the Registry's Office and the Compliance Officer.

(29)   The College will take steps to contact the international student directly by appropriate means.

> For example: Phone; email; social media; written letters; home visits; and/or requesting the agent responsible for the student's recruitment to contact the student.

(30)   Where the international student's welfare is of concern, the College may contact the student's agent, listed next-of-kin and/or emergency contact in order to ensure that they are safe. Contact may also be made with the relevant Emergency Services.

(31)   Where an international student fails to respond to any contact within seven days, the College will issue an *Intention to Report* to the Department of Home Affairs. A continued failure to respond:

a. will instigate further formal reporting to the Department of Home Affairs pursuant to the visa conditions; and

b. may necessitate notification of the Police and the student's next-of-kin.

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Attachment A: Determining the level of risk

Level of risk	Determined by	Examples:
SEVERE (Emergency services required)	CEO Or Most senior member of staff available at the time	• Death, suicide or threat of suicide, or life-threatening injury • Deprivation of liberty; actual or threats of violence, assault, rape/sexual assault, or other abuse; aggravated burglary, use of firearms, biological or chemical weapons • Fire, bomb threat, explosion, gas/chemical hazards, discharge of firearms • Threat of widespread infection or contamination • Natural disaster affecting campus
SIGNIFICANT (Emergency Services USUALLY required)	CEO Or Most senior member of staff available at the time	• Severe workplace health and safety risk • Serious injury incurred by staff/student • 'Missing' international student • Child protection matter • Violent behaviour • Burns/alcohol/overdose/poisoning • Activity where evacuation is required • Notifiable data breaches and threats to cyber security
MODERATE (Emergency Services MAY be required)	CEO Or Most senior member of staff available at the time	• Work Health and Safety risk • Suspicious package left unattended • IT System crashes • Student suffers epileptic fit or psychological breakdown

Attachment B: MANAGEMENT OF CRITICAL INCIDENTS

CRITICAL PHASE - IMMEDIATELY AFTER INCIDENT
First Responder/s/Critical Incident Officer:
Assess danger to yourself and to others
Secure the area
Ensure immediate safety of students/staff/visitors
Call emergency services / ambulance / fire / police if appropriate

NOTIFY
Critical Incident to CEO or most senior staff member

FORM CRITICAL INCIDENT TEAM
DEVELOP & ACTION CRITICAL INCIDENT PLAN
(That is, where appropriate, assess the incident, implement appropriate intervention strategies, allocate roles and resources & assess future responses)

ORGANISE
Debriefing, counselling, follow-up

REPORTING, RECORD KEEPING, FOLLOW-UP & EVALUATION

Attachment C: Critical Incident Contacts

Emergency Contacts	Contact
Police, Fire, Ambulance	000 (triple zero)
State Emergency Service	132 500
NSW Poisons Information Centre	13 11 26
Phone-based interpreting service via Department of Homes Affairs Translating and Interpreting Service (TIS National)	13 14 50
Health Direct – 24-hour health advice line	1800 022 222
National Sexual Assault, Domestic Family Violence Counselling Service	1800 RESPECT (1800 737 732) www.1800respect.org.au

Local Hospitals	Contact
Concord Repatriation General Hospital	9767 50000 Hospital Road, Concord NSW 2139
Auburn Hospital	8759 3000 Hargrave Road, Auburn NSW 2144
St. Vincent Hospital	8382 1111 390 Victoria Street, Darlinghurst NSW 2010
Royal Prince Alfred Hospital	9515 6111 50 Missenden Road Camperdown NSW

Mental Health Support Services	Contact
NSW Mental Health Line	1800 011 511
Mensline Australia	1300 789 978
Beyond Blue	1300 224 636
Women's Information Line	1800 817 227
QLife (LGBTIQ + SUPPORT) Australia	1800 184 527
Road Trauma Support Team	1300 367 797
Lifeline	131 114

Other Useful Contacts	Contact
Department of Home Affairs	131 881 www.homeaffairs.gov.au
Overseas Ombudsman	1300 362 072 www.ombudsman.gov.au
WorkCover NSW	13 10 50 www.workcover.nsw.gov.au

Related documents

This Procedure should be read in conjunction with but not limited to:

- Critical Incident Policy
- Work Health and Safety Policy
- Sexual Assault and Sexual Harassment Prevention Strategy
- EEO, Bullying and Harassment Policy
- Student Code of Conduct
- Staff Code of Conduct

Legislation:

- Education Services for Overseas Students Act (2000) (Cth) (and the National Code of Practice for Providers of Education and Training to Overseas Students 2018)
- Tertiary Education Quality and Standards Agency Act (2011) (Cth) (and the Higher Education Standards Framework (Threshold Standards) 2021 made under that Act)
- Work Health and Safety Act (2011) (NSW) (and the Workplace Health and Safety Regulations 2011 (NSW) made under that Act) Employees Liability Act (1991) (NSW)
- Privacy Act (1988) (Cth) (including Schedule 1 - Australian Privacy Principles)
- SafeWork NSW

Document Administration

Procedure Name	Critical Incident Procedure
Policy Owner	CEO
Approval Authority	Board of Directors
Approval Date	29 September 2022
Effective Date	As at Approval Date
Next Review #	Three years from the Approval Date
Amendment history	
Version 1:	Critical Incident Policy and Procedure document (POL-14) replaced by new policy and associated procedure document.

 # Unless otherwise indicated, this Procedure will still apply beyond the Review date