

Critical Incident Policy¹

Context

This policy is intended to provide a framework for the response to, and management of, critical incidents that pertain to domestic and international students studying with Group Colleges Australia (GCA).

Rationale

This policy encompasses the management of critical incidents from a human and risk management perspective.

Definitions:

A critical incident is defined by the National Code as 'a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury'.

Critical incidents are not limited to, but could include:

- missing students;
- severe verbal or psychological aggression;
- death, serious injury or any threat of these;
- natural disaster; and
- issues such as domestic violence, sexual assault, drug or alcohol abuse. Non-life threatening events could still qualify as critical incidents.

It is important to note that what is a critical incident for one person may not be a critical incident for another. It depends on one's perception of vulnerability and amount of control over a situation. Every critical incident is unique and will need to be dealt with differently and according to the needs of the people affected. Each critical incident also needs to be carefully assessed and managed in line with cultural sensitivities for the student(s) impacted and their families.

Scope

Under this policy GCA will, in the event of a critical incident, recognize that appropriate infrastructure must be in place to ensure the provision of all necessary support services. This document outlines GCA policy, support mechanisms and procedures for managing a critical incident.

Under Standard 6 of the National Code 2018, Student Support Services, Registered Providers must support students to adjust to study and life in Australia, to achieve their learning goals and to achieve satisfactory academic progress towards meeting the learning outcomes of the course.

¹ A number of external documents were used in the development of this policy. See **Appendix 4 for a listing** and also **Appendix 5** for the independent benchmarking exercise.

The intention of Standard 6 is to ensure that appropriate support services are available to international students to ease the transition into life and study in Australia and allow access to appropriate assistance for the student as needed.

Under Standard 6 the registered provider must have a documented critical incident policy together with procedures that covers the action to be taken in the event of a critical incident, required follow-up to the incident, and records of the incident and action taken.

This policy will ensure that Group Colleges Australia has:

- An effective approach in responding to critical incidents as they occur;
- Appropriate support and counselling services available to those affected;
- Appropriate training and information resources provided to staff.

The following steps outline the process to manage a critical incident and apply to GCA staff including sessional staff members, who may be present when the incident occurs or who may be the first point of contact for the student.

Record Keeping²

All records relating to the critical incident response (including remedial action) will be generated, stored and retained by GCA for a minimum of two years as specified by Standard 6.8.

Critical Phase

The critical phase is that time immediately after the incident has occurred, or the point in time when the student first contacts GCA. All staff should ensure that they consider the following points in dealing with the incident:

- that the student is safe and is receiving adequate medical supervision in a safe environment;
- that other students are safe;
- If appropriate, ensure that emergency services have been notified.
- that the incident is reported to the relevant Manager (e.g. CEO)
- relevant authorities are contacted as appropriate (e.g. police, ambulance);
- Ascertain the facts:
 - Casualties – Are there any?
 - How critical are they?
 - Damage to property and equipment
 - Impact on academic services
 - IT systems – Are they available?
 - Telephones – Do they work?
 - Media – Are external media on site or seeking a response?

² This includes all records of critical incidents and remedial action.

- if necessary, an interpreter is called to stand by for assistance;
- Secure area affected - minimise safety exposures and preserve where possible anything which may provide information for later use by emergency services or in follow-up
- Contain the incident
- Formulate response strategies
- Contact with next of kin/significant others - consider the most appropriate manner of contact?
- Arrangements for informing staff and students.
- Guidelines to staff about what information to give students.
- Briefing staff and delegating a staff member to deal with telephone/counter inquiries.
- Managing media/publicity
- Formulate recovery strategies and position GCA to return to normal operations
- Advise CEO of progress
- Confirm access to emergency funds if necessary.
- Consider regular debriefings throughout the management of the incident.
- Once the incident is contained, evaluate the management process for the purpose of continuous improvement
- that activities are resumed if appropriate once satisfied that the student is not in danger and receiving medical supervision;
- that at the earliest possible time the student is interviewed to ascertain what happened and if there are any ongoing problems;
- that other students are supported and counselling is arranged if required;
- that any other immediate needs, i.e. need for additional support, to make a police report, report stolen goods are attended etc.

Ongoing and follow up response

Once the incident has been managed and necessary contact has been made with all relevant personnel, it is important that follow up of the student is undertaken by a nominated staff member. It may also be required to contact the students family. This may include the following:

- Keeping in contact with the student and relevant others which may include monitoring the situation with a daily call.
- Checking that the student is receiving ongoing help with medical conditions and counselling.
- Passing on findings to the appropriate manager and other relevant people.
- Arrangements for visits to/from family
- Liaison with police, doctors, hospital staff

- Death notices
- Making arrangements for hospital/funeral/memorial service/repatriation
- Obtaining a death certificate
- Assisting with personal items and affairs including insurance issues, Overseas Student Health Cover (OSHC) coverage, ambulance cover
- Fees issue to be resolved if student cannot continue with their studies
- Legal issues: helping students get access to legal assistance if required.
- Arrangements for further debriefing sessions for groups/individuals as required
- Follow up condolence or other letters to family
- Financial assistance for families of affected person(s) if residing in Australia.

When an international student is involved in a critical incident, GCA may be required to further assist the student's family. This may include:

- Hiring interpreters
- Refund of student's fees to pay repatriation or associated expenses
- Assisting with visa issues
- Liaison with the Department of Home Affairs if studies will be interrupted

Investigation Process

To ensure that the critical incident is accurately recorded and managed, the nominated Manager should ensure that any interview that is conducted:

- Collects facts about the incident (e.g. injuries to person, any witnesses, information from the scene). This may be in written form or through the use of media such as photographs as appropriate.
- Examines any work procedure or safe operating procedure or training that may have impacted the incident.
- Determines the cause of the accident/incident paying attention to contributing factors, environmental factors, mechanical failure, and systems failure.
- Reviews work procedures, training, and/or safe operating procedures.
- Documents recommendations.
- Communicates results of investigation to employees and relevant others.

Reporting

It is important that necessary staff are informed of the outcomes of the investigation and that any written report is provided to the appropriate manager.

- Written reports in the format (**Appendix 1**) approved by the student for accuracy, are to be put on the student file.
- If there is a death, then the procedure set out in **Appendix 2** should be followed.
- A written report is to be sent to the parents of the student and other relevant authorities with permission.
- The Checklist in **Appendix 3** is to be completed after any critical incident.
- Suggestions and recommendations are to be made to prevent similar occurrences.

International Students

If the decedent was an enrolled international student there are additional reporting requirements under the Education Services for Overseas Students Act 2000 (ESOS Act).

- The Students Services Manager must be advised of any incident.
- As soon as practical after any death, the Student Services Manager must advise a Department of Home Affairs Provider Liaison Officer of the circumstances of any incident.
- GCA is required to notify the Department of Home Affairs as soon as practical after the incident and in the case of an international student's death or other absence affecting the student's attendance, the incident will need to be reported via the Provider Registration and International Student Management System (PRISMS). All aspects of the incident and its management will be recorded on the student files. Any action taken in regard to a critical incident will be recorded to include outcomes or evidence if the incident is referred to another person or agency
- Using PRISMS to report the student's death, the Student Admissions Officer will enter the student course variation reason/code as below against the student's electronic confirmation of enrolment (eCoE)
- Reason for Student Course Variation --- Termination of Student studies prior to completing the course
- Termination Reason --- Provider decision to cease student enrolment
- Provider decision to cease student enrolment reasons --- Student has died (include full details in the comment field as per death certificate/funeral notice and state that Department of Home Affairs has been notified by email and provided supporting documentation)

The Student Services Manager or delegate must advise: the Executive Dean, the CEO and the Chief Technical Officer.

The following details should be presented:

- student name;

- student number
- program, location and the time the student attended the University
- date of birth
- cause of death (if known)
- name of next of kin (if known)
- contact address for next of kin (if known)

Media Management

- A media management process will be included in the management plan to ensure the most positive and supportive response from the media. Media Management is directed solely by the CEO.

Critical Incident Staff Training

- It is important for all GCA staff to be aware of the policy and procedures and how to respond in the events of critical incidents. This would include:
- Debriefing as soon as possible after the event on an individual or group basis
- Further debriefing - one or more days after the incident (group basis)
- Follow up 2 to 6 weeks later - (individual or group basis)
- Ongoing refresher training as required
- Recovery time for staff involved

Critical Incident Recovery Timeline

- In order to successfully manage a critical incident, GCA will always take appropriate action and provide support during and after a critical incident.
- The recovery timeline following a critical incident will vary depending on the circumstances.
 - *Within 24 hours*
 - Gather the facts;
 - Ensure safety and welfare of staff and students and arrange for first-aid if necessary;
 - Where possible notify the time and place of the debriefing to all relevant persons;
 - Manage the media;
 - Set up a recovery room;
 - Keep staff, students and parents/family informed.

- *Within 48-72 hours*
 - Arrange counselling as needed;
 - Provide opportunities for staff and students to talk about the incident;
 - Provide support to staff and helpers;
 - Debrief all relevant persons;
 - Restore normal functioning as soon as possible;
 - Keep parents/family informed.
- *Within the first month*
 - Arrange a memorial service, if appropriate;
 - Encourage parents/family to participate in meeting to discuss students' welfare;
 - Identify behavioural changes and the possibility of post-traumatic stress disorder and refer to health professionals;
 - Monitor progress of hospitalised staff or students;
 - Monitor mental and physical health of all helpers.
- *In the longer term*
 - Monitor staff and students for signs of delayed stress and the onset of post- traumatic stress disorder - refer for specialised treatment;
- Provide support if needed *In the long term*
 - Plan for and be sensitive to anniversaries, inquests and legal proceedings
 - Access specialist support if needed.

Legislative Context

- National Code Standard 6
- National Code 5, 7, 10 and 11
- Privacy Act 1988
- Australian Privacy Principles

Related Documents

- GCA Student Code of Conduct
- GCA Employment Contract
- GCA Sexual Assault Policy
- Privacy Policy
- GCA Staff Grievance Policy
- UBSS Student Grievance Policy

Version Control and Accountable Officers

Policy Category	GCA	
Responsible Officer	Director – Staff Experience	
Review Date	January 2024	
Approved By	EMT	

Previous Version/Date	V4		January 2021
Version	Authored By	Description of Changes	Approved By
001	AK	New template ³	EMT March 2021
002	AK	Refresh	Jan 2022
003	AK	New paragraph record keeping added	July 2022
004	AK	Refresh	EMT Feb 2023
005	NC	Position name update	EMT Dec 2023

³ Note the new template was approved by the EMT 4 March 2021

Appendix 1

Critical Incident Report (To be completed after all critical incidents).

Date:

Action Officer:

Position:

Brief summary of incident: include where, when, who, and why as appropriate. Further information/documentation may be attached.

Immediate action taken:



Further action required:

Persons or staff notified and time & date:

Signature:

Date:

Follow up: (a) Original to Critical Incident Record File; (b) Copy to student files (Student Services)

Appendix 2– Procedures in case of student death

In the case that an incident results in the death of a student, the relevant GCA manager should form a coordinating committee that is comprised of relevant employees including the Students Services Manager and student advisor representatives. The responsibilities of this committee are to:

- Assess risk and plan immediate response actions.
- Liaise with emergency and other services.
- Allocate individual roles and responsibilities for tasks.
- Make contact with appropriate personal which may include:
 - Next of kin;
 - Other students (those involved, friends);
 - Hospital;
 - Counselling/support staff;
 - The person assigned to deal with the media;
 - Teaching/academic and other relevant staff;
 - Student associations;
 - Chaplain or priest;
 - Department of Home Affairs, Consulate, Sponsor, Accommodation provider (for overseas students)
 - Liaise with other external bodies.
- Arrange counselling of students and staff not directly involved in the incident.
- Plan ongoing strategies.
- Keep careful records throughout the process.
- Ensure staff left in the office have enough information to handle enquiries.
- Establish what costs can be met by GCA.
- Discuss fee reimbursement.
- Investigate any insurance issues.
- Arrange condolence letters to everyone involved.
- Arrange thank you letters.
- Arrange a debriefing.
- Offer follow up support to those involved.
- Review critical incident procedure.
- Review critical incident procedure.

For overseas students the responsibilities of the committee may also be to:



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- Arrange a funeral or memorial service.
- Obtain a copy of the death certificate and related documents.
- Arrange for repatriation.
- Arrange for the student's possessions to be stored or sent to his/her family.

Appendix 3– Checklist for follow up, review and evaluation

How well were the following actions undertaken by the Critical Incident Coordinating Group? 1

= poor; 5 = excellent.

Please add comments to clarify your choice if required

Questions	1	2	3	4	5
Decision maker clear					
Follow up clear					
Arrangements for visits to/from family					
Notification of and liaison with Sponsor/ Agent					
Liaison with Police, Doctors, Hospital Staff					
Liaison with Independent Interpreters					
Making arrangements for hospital/funeral/memorial service/repatriation					
Death Notices					
Funeral/ Memorial Service Arrangements					
Refund of student's fee to pay repatriation or associated expenses					
Copy of Death Certificate					
Consideration of personal items and affairs (household and academic)					
Insurance Matters, OHSC Coverage, Ambulance Cover					
Formal Stress Management interventions required for students and/or staff (release from classes, leave, rescheduled exams)					
Liaison with Academic Staff					
Arrangements for further debriefing session for groups/ individuals					
Liaison with the Department of Home Affairs if studies will be interrupted					
Fees issue to be resolved for students unable to continue with their studies					



Legal issues: helping students get access to legal assistance if required					
Follow up condolence or other letters to Family					
Financial Assistance for families of affected person(s) if residing in Australia					
Organising students/ staff for hospital visits					

Appendix 4– External Documents Consulted

Name of Document	Institution Name	Website	Date Accessed
Critical Incident Policy and Procedure	Moore College	https://moore.edu.au/documents/2019/01/critical-incident-policy.pdf/	16/01/2023
Critical Incident Policy	James Cook University	https://www.jcu.edu.au/policy/corporate-governance/critical-incident-policy	16/01/2023
Critical Incident Management Policy and Procedure	Notre Dame University	https://www.notredame.edu.au/community/student-wellbeing-and-support/campus-security/critical-incident-management-policy-and-procedure	16/01/2023

Appendix 5- Independent External Benchmarking

These institutions were considered as they were institutions of higher education, who had received 7 years with no conditions. The question considered was if the critical incident policy specifies that all records had to be kept for at least 2 years. The findings are correct as of 2 July 2022.

Who	Policy	Link	TEQSA Registration status	2 year record keeping specified?
Excelsia College	Critical Incident Policy and Procedure	https://excelsia.edu.au/wp-content/uploads/critical-incident-management-procedures.pdf https://excelsia.edu.au/wp-content/uploads/conflict-of-interest-policy.pdf	7 years no conditions Partial self accrediting	N
KBS	Critical Incident policy	https://www.kbs.edu.au/documents/critical-incident-policy	7 years no conditions	N
Moore college	Critical Incident Policy	https://moore.edu.au/documents/2019/01/critical-incident-policy.pdf	7 years no conditions	N
Top Education	Critical Incident Policy	file:///H:/Downloads/GP015%20Critical%20Incident%20Policy_20210902AB_approvaldateunchanged.pdf	7 years no conditions Partial self accrediting	N