

Critical Incident Policy and Management Plan

Purpose

The Australia Advance Education Group Pty Ltd (AAEG) trading as Sydney International School of Technology and Commerce (SISTC) ensures effective and sufficient preparation for, and response and recovery to, critical incidents affecting the facilities, information and technology resources, or the physical or psychological wellbeing of employees, students and visitors. Incidents can affect our ability to maintain operations and provide continuity to student learning and support services, resources, facilities (including IT infrastructure, safety and security, storage and operations) and administration.

The purpose of this Critical Incident Policy and Management Plan is to ensure that we act to prevent critical incidents where possible and are prepared to respond and recover cooperatively from any critical incident effectively. We implement this through the appropriate mobilisation of expertise, procedures and resources, in order to minimise the potential impact on people and place. Our approach fulfills the critical incident requirements of the *Higher Education Standards Framework* (HESF Threshold Standards) 2021 Standard 2.3, the National Code 2018 for Providers of Education and Training to Overseas Students and the ESOS Act 2000 Standard 6.8. These requirements include policy and procedures that include immediate actions, follow up and records management.

Scope

This Policy applies to all staff and students, including sessional staff and visitors and is a focus of our induction and orientation process for staff, students and applicable contactors.

Principles

In responding to and managing critical incidents, we are guided by the following principles:

- minimise harm and promote the health and safety of our people: on campus, on placements, external activities and in our eLearning community
- identify risk and prevent critical incidents where possible
- allocate preventative actions, training and management resources as applicable
- ensure rapid and commensurate incident response times
- provide immediate support and clear guidance
- share accurate information to all key contacts including police, Emergency Services, Health Services, Australian Cyber Security Services, Department of Home Affairs, student/ staff emergency contacts (including overseas) and refer to community support services and our student support services including counselling:
- ensure emergency evacuation processes are understood and practiced
- share accurate information with students during orientation and staff during training
- ensure continuity of learning and continuity of service as part of business as usual or resumption as soon as practicable
- operate within the Australian Privacy Principles (Commonwealth, state and territory).

A critical incident is defined as sudden and unexpected emergency/ crisis or 'traumatic event, or the threat of such (within or outside Australia) which causes extreme stress, fear or injury' which require an immediate, structured and coordinated response to defuse or ameliorate the immediate threat they represent to people. They may be either in play or imminent and has the potential to threaten the health, safety and welfare of people (primary concern) or our assets

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(secondary concern).

Critical incidents include, but are not limited to:

- serious injury or death or any threat of these (staff, student or visitor)
- physical or sexual assault
- violence or threat of violence
- any incident or event that negatively impacts a student ability to complete their course of study
- missing students or staff
- severe verbal or psychological aggression
- campus or infrastructure damage including break ins or major vandalism
- incidents where sights, sounds, smells cause distress
- robbery
- natural disaster
- fire, explosion or bomb threat
- terrorist or hostage incident
- chemical, radiation or biological spill
- threatening behaviour by student, staff or member of the public
- medical emergency or acute illness on part of staff member or student (including those caused by allergens)
- civil disobedience or disorder (directly or indirectly)
- suspicious mail/package/backpack etc.
- pandemic and/or infectious disease outbreak.

Our response to unexpected crisis situations, critical incidents associated with the elements or fire and flood, also require a systemic and integrated response across human and non-human domains and are covered under our Disaster Recovery and Business Continuity Policy.

Governance, Roles and Responsibilities

The Board of Directors carries first line responsibility and accountability for critical incident management and response.

The CEO is responsible for dissemination and implementation of this Policy and Procedure, ensuring relevant key staff are aware of their roles and responsibilities. The Chief Executive Officer (CEO) is the responsible and accountable operational delegate. In the absence or unavailability of the CEO, the Director of Operations (DoO) will be the responsible and accountable delegate.

The Director of Operations (DoO) is also responsible for ensuring induction/ orientation, relevant drills and training for all staff and students.

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Our comprehensive approach to critical incident response and management has six steps:

1. Prevention - preparation (prior)
2. Reaction - initial response (immediate)
3. Support - debriefing (immediate to short term)
4. Recovery - operational adjustment (immediate to short term)
5. Restoration - Intervention and support (mid to long term)
6. Record and report (throughout).

Appendix A shows the SISTC Critical Incident Action Flowchart. The flowchart is displayed at the Campus premises.

Appendix B lists local emergency and legal contacts for Sydney and Melbourne (Dandenong) campuses.

1. Prevention - Preparation

Position	Responsibility
CEO / DoO	<ul style="list-style-type: none"> • An Emergency Response Team is established • Regular communication, updates and training • Regular maintenance of all facilities • Prominent display of emergency evacuation notices illustrating the location of assembly in the event of a fire or other similar situation (Appendices C & D) • Clearly marked emergency exits are clearly marked and kept clear of obstacles at all times • Appointed and trained emergency wardens to lead emergency procedures • Appointed and trained first aid officers aid with posted named location list for staff and student accessibility • Appropriate resource availability • Regular monitoring of safety measures through the WHS site contacts and relevant managers • Regular emergency evacuation drills • Retrievable institutional electronic records via Cloud and server back up storage • Reporting of hazards, near misses and any safety issues by staff and students for prompt action by management • Induction and orientation for new staff and students including their role in Critical Incidents • Drill and familiarisation with lock down procedures including safe and secure lockable rooms or escape paths • Checking and reporting of suspicious activity and/or persons to reception, such as unauthorised people on campus.

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Position	Responsibility
Deputy Director Student Services (DDSS)	<ul style="list-style-type: none"> Maintain the Student Emergency and Community Resource contact list including: <ul style="list-style-type: none"> key SISTC campus contact numbers SSITC student support services contacts Medical practitioners Emergency contacts including Police, Fire, Ambulance, Hospitals Community services and wellbeing support Counselling services (including personal and financial) English language and academic English support Insurance providers Pertinent government departments and regulators, such as the Department of Home Affairs, Education and Training, Consumer Affairs Consular representatives Ethnic community contacts Interpreters Global assistance and overseas health cover providers Sexual Assault and Sexual Harassment Support Work rights, including tax file number Additional topical safety tips updated annually.

2. Reaction - Initial Response (immediate)

Position	Responsibility
CEO/DoO	<ul style="list-style-type: none"> Convene the Emergency Response Team Check to confirm if any student or staff is involved in the critical incident in the case of a student death or absence affecting student course progression, ensure it is reported in the Provider Registration and International Student Management System (PRISMS) (see Appendix E) If a student or staff is injured, check to ensure they are safe and receiving appropriate medical attention in a safe environment Maintain the primary objective of keeping people safe and protecting lives, with salvage and recovery secondary priorities Take lead role in directing response and commensurate communication Manage situation until it can be handed over to relevant authorities Mobilise medical emergency response facilities (e.g. staff trained personnel/ambulance etc.) Alert Board Chair of situation and response/ strategy Notify the Department of Home Affairs (DHA) and the Department of Education and Training (DET) of the critical incident involving an international student Ensure immediate safety/ wellbeing of affected people (staff and students) with emphasis on immediate removal of people from the immediate area and/or cause of threat

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Position	Responsibility
	<ul style="list-style-type: none"> Ensure bespoke arrangements are organised immediately for assistance to students and staff with disabilities and/or who have reasonable adjustments in place and/or graduated return to work (staff) provisions in respect of a disability or impairment Manage media contact (with CEO as spokesperson).
Emergency Response Team	<ul style="list-style-type: none"> Assess the situation, determine level of threat, priorities and appropriate response which may include convening an emergency response team and nominate a key investigator Get a clear understanding of the incident, including as much as possible accurate and up-to-date information about what happened and the current situation At the earliest time interview the student and/or relevant staff to ascertain what happened and to identify any ongoing issues Where a student is involved in the incident, obtain detailed student information, such as student ID number(s) and local address(es), next of kin, nationality, religion, known medical conditions and health insurance provider (especially for overseas students) Contact relevant authorities as appropriate (e.g. police, ambulance) If necessary, call an interpreter and have them stand by for assistance Support other students or arrange counselling support If the critical incident involves a student with a psychiatric disability, determine the extent of information that can be provided given the privacy considerations Maintain the primary objective of keeping people safe and protecting lives, with salvage and recovery secondary priorities Take lead role in directing response and commensurate communication Manage situation until it can be handed over to relevant authorities Mobilise medical emergency response facilities (e.g. staff trained personnel/ambulance etc.) Alert Board Chair of situation and response/ strategy Notify the Department of Home Affairs (DHA) and the Department of Education and Training (DET) of the critical incident involving an international student Ensure immediate safety/ wellbeing of affected people (staff and students) with emphasis on immediate removal of people from the immediate area and/or cause of threat Ensure bespoke arrangements are organised immediately for assistance to students and staff with disabilities and/or who have reasonable adjustments in place and/or graduated return to work (staff) provisions in respect of a disability or impairment Provide general alerts and instruction to people not in the immediate area of threat but who potentially may be affected, either by their entering the area of threat or by the threat itself spreading or becoming more intensive Implement and oversee evacuation procedures when and if appropriate.
All staff	<ul style="list-style-type: none"> follow directions of delegated officers (as above).

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3. Support – debriefing (Immediate to short term)

Position	Responsibility
CEO	<ul style="list-style-type: none"> • Mobilise professional advice and assistance to assess situation and appropriate response • Mobilise resources and funds to support provision of immediate counselling and support for affected • Staff and clients • Monitor situation at an individual and work group level • Determine with appropriate professional the mid to longer term support strategy • Prepare comprehensive Board report.
DoO (in conjunction with CEO)	<ul style="list-style-type: none"> • Mobilise necessary resources in support of CEO strategy (above) • Manage ongoing briefings/updates to Board of Directors • Act as ongoing contact point for authorities • Monitor ongoing staff and student reaction in conjunction with relevant academic and administrative managers.
DoO	<ul style="list-style-type: none"> • Prepare Critical Incident Report for Board of Directors including details of the incident and any corrective action taken or planned • Include baseline data and same period statistical comparison dashboard data.

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4. Recover - Operational Adjustment (Immediate to Short term)

Position	Responsibility
CEO	<ul style="list-style-type: none"> Ensure each incident is recorded in the Critical Incident Register and on related individual staff/student files as applicable; includes all keep steps; timeframes; remedial or corrective actions through to resolution Agree the recovery timeframe (Appendix C) Ensure strategic reporting to the applicable governing body. Advise Board throughout according to risk severity.
DoO (in conjunction with CEO)	<ul style="list-style-type: none"> Interview relevant parties to establish effectiveness of their level of preparedness and clarity of responsibilities Review Critical Incident Procedures as required Review relevant corporate policies, in particular SISTC Risk Policy and Risk Register and SISTC Delegations Policy and Framework Review operational aspects (e.g. access, security, safety, communications, liaison with authorities) and propose adjustments where necessary Make changes to ongoing arrangements as necessary Review with authorities the response effectiveness and adjust procedures as necessary Take responsibility for ongoing staff support and adjustment strategy Ongoing BoD briefing to final resolution.

5. Restore, review and action - Intervention and Support (Mid to Long Term)

Position	Responsibility
CEO and DoO	<ol style="list-style-type: none"> Establish clear review, improvement and response timeframes Evaluate the response, the roles and responsibilities and overall direction of review of the incident and effectiveness of response to determine improvements, associated policy and plan changes and report to the BoD.

6. Record and Report (throughout)

Position	Responsibility
CEO	<ol style="list-style-type: none"> A copy of the Incident Report to be maintained as part of records for at least 2 years after which the student is no longer an 'accepted student' under the ESOS Act. The CEO is the authorised media contact. This policy and plan are reviewed every 3 years. The Risk Register to be maintained and archived annually with maintenance of archives for 10 years.

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International Students and the National Code

The *National Code of Practice for Providers of Education and Training to Overseas Students 2018* Standard 6.8 requires that providers registered to deliver courses to international students must have and implement a documented policy and process for managing critical incidents that could affect the student's ability to undertake or complete a course, such as but not limited to incidents that may cause physical or psychological harm. Providers are also required to maintain a written record of any critical incident and remedial action taken for at least two years after the international student ceases enrolment.

The Educational Services for Overseas Students Act 2000 (ESOS Act) requires the Institute to notify the Department of Home Affairs and the Department of Education as soon as practical after a critical incident involving an international student.

In the case of a student's death or other absence affecting the student's course progression, this shall need to be reported via the Provider Registration and International Student Management System (PRISMS).

Relevant Legislation and Standards

Work Health and Safety Act 2011 (NSW)

Higher Education Standards Framework (Threshold Standards) 2021 Domains 2 and 6.

National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018) Standard 6.

Australian Privacy Principles

Key Related Documents

AAEG Governance Charter (Delegations)

AAEG Risk Framework and Policy

SISTC Risk Register

SISTC Disaster Recovery and Business Continuity Policy and Procedures

SISTC Health and Safety Framework and Policy

SISTC Privacy Policy

Notes

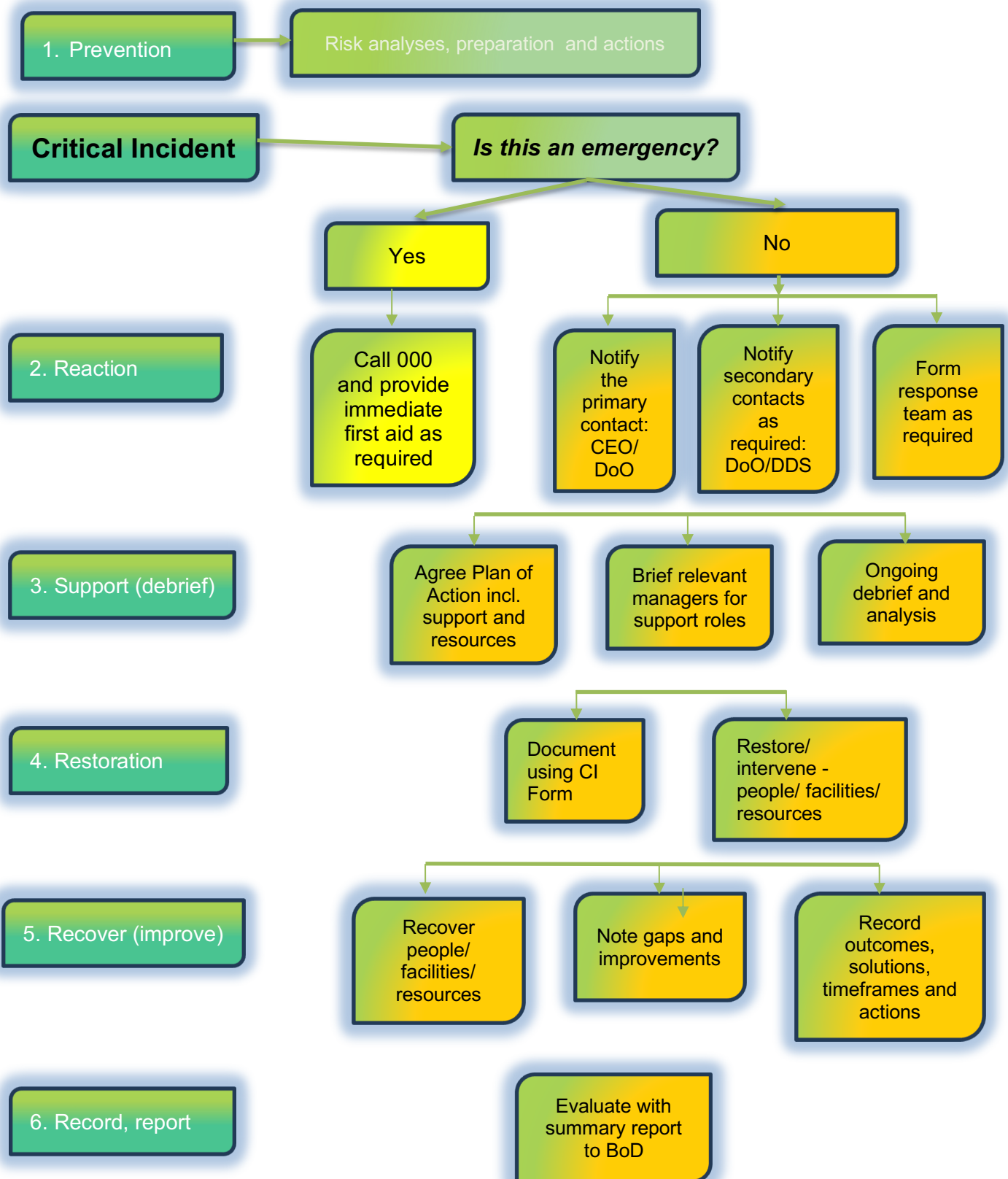
Responsible Officer	CEO
Approval Authority/ Authorities	Board of Directors
Date Approved	4 August 2023
Date of Last Review	25 February 2020
Date for Review	Every 3 years - 4 August 2026
Superseded Documents	None

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Amendment History	<p>V1.0 updated with the SISTC logo July 2020.</p> <p>V1.1 has been updated with pandemic/infectious diseases outbreaks in the definition of a critical incident and approved on 5 February 2021.</p> <p>V1.2 amended with the approved changes to the senior management structure on 28 April 2021. V1.3 updated with the changes to the HESF 21 1 July 2021</p> <p>02.00 Major Review, revised strategy stages, reporting requirements and supporting appendices and alignment to National Code Standard 6 Student Support Services.</p> <p>02.00 Major Review, revised strategy stages, reporting requirements and supporting appendices and alignment to National Code Standard 6 Student Support Services.</p>
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Appendix A: Critical Incident Action Flowchart



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Appendix B: Emergency and Legal Contacts

Delegate type	Delegate title	Contact details
Primary	CEO	0457 522 198
Secondary	DoO	0433 762 862
Additional	ADSS	0474 776 448
Critical Information Technology Incidents		
Galactic Solutions	IT & Comms <ul style="list-style-type: none"> • Data security & protection from malicious attacks • Repairs & maintenance • Comms and business solutions 	Email: Paul Rayner 1. Support ticket paul@galacticsolutions.com.au 2. During business hours Phone: (02) 8004 0048 3. For urgent calls only Mobile: 0405 608 141
Go Click On	Domain and web hosting; digital marketing; website development; IT support	Goclickon.com.au Info@goclickon.com.au support@goclickon.com.au Phone: 1300 442 648

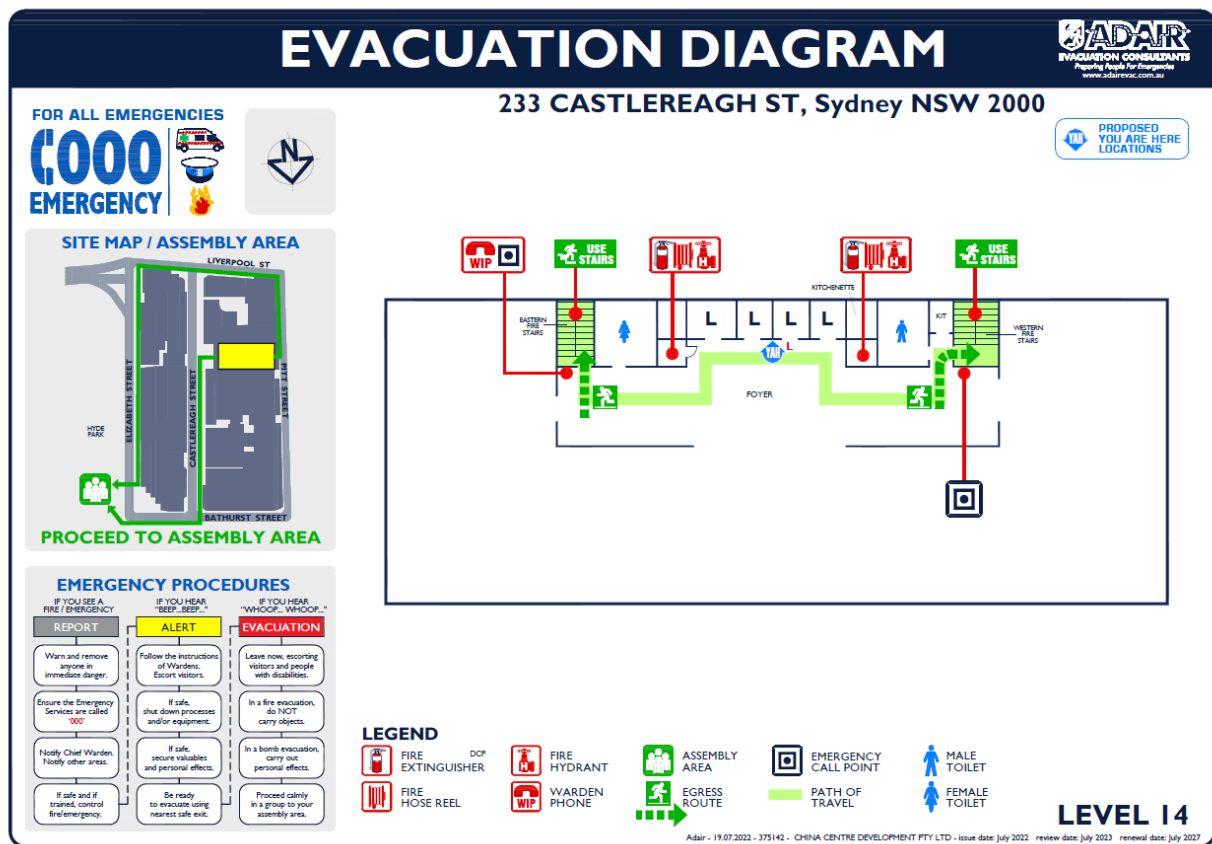
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Service	Phone and online contacts	Address
Emergencies		
Police	000	
Fire Brigade	000	
Ambulance	000	
Home Doctor Service	137 425	
24 Hour Counselling and Psychological Support		
Lifeline	131 114	
Beyond Blue	1300 224 636	
Suicide Call Back Service	1300 659 467	
Sexual Assault and Domestic Violence		
1800 Respect	1800 424 017	
NSW Rape Crisis	1800 211 028	
Sexual Assault Services Victoria	1800 806 292	
Local Police Department		
Sydney City Police Department	(02) 9265 6499	
Dandenong (VIC) Police Station	(03) 9767 7444	
Local Hospital		
Hospitals Sydney	Royal Prince Alfred Hospital (02) 9514 6111 St Vincent's Hospital (02) 8382 1111	Missenden Road Camperdown Sydney 390 Victoria Street Darlinghurst Sydney
Hospitals Melbourne	Dandenong Hospital (03) 9554 1000 Corymbia Day Hospital (03) 8769 8555 Monash Medical Centre (03) 9928 8111	135 David Street Dandenong, VIC 92 David Street Dandenong VIC Centre Road Bentleigh East VIC
Legal and Advocacy Services		
International Student Legal Service NSW	02 9698 7277	Redfern Legal Centre Sydney
International Student Employment and Accommodation Legal Service	1800 056 449 info@studymelbourne.vic.gov.au	Study Melbourne Hub (Online)
Overseas Student Ombudsman	1300 362 072	
Department of Home Affairs (DoHA) National Office	(02) 6264 1111	

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Appendix C

Sydney Campus Evacuation Plan

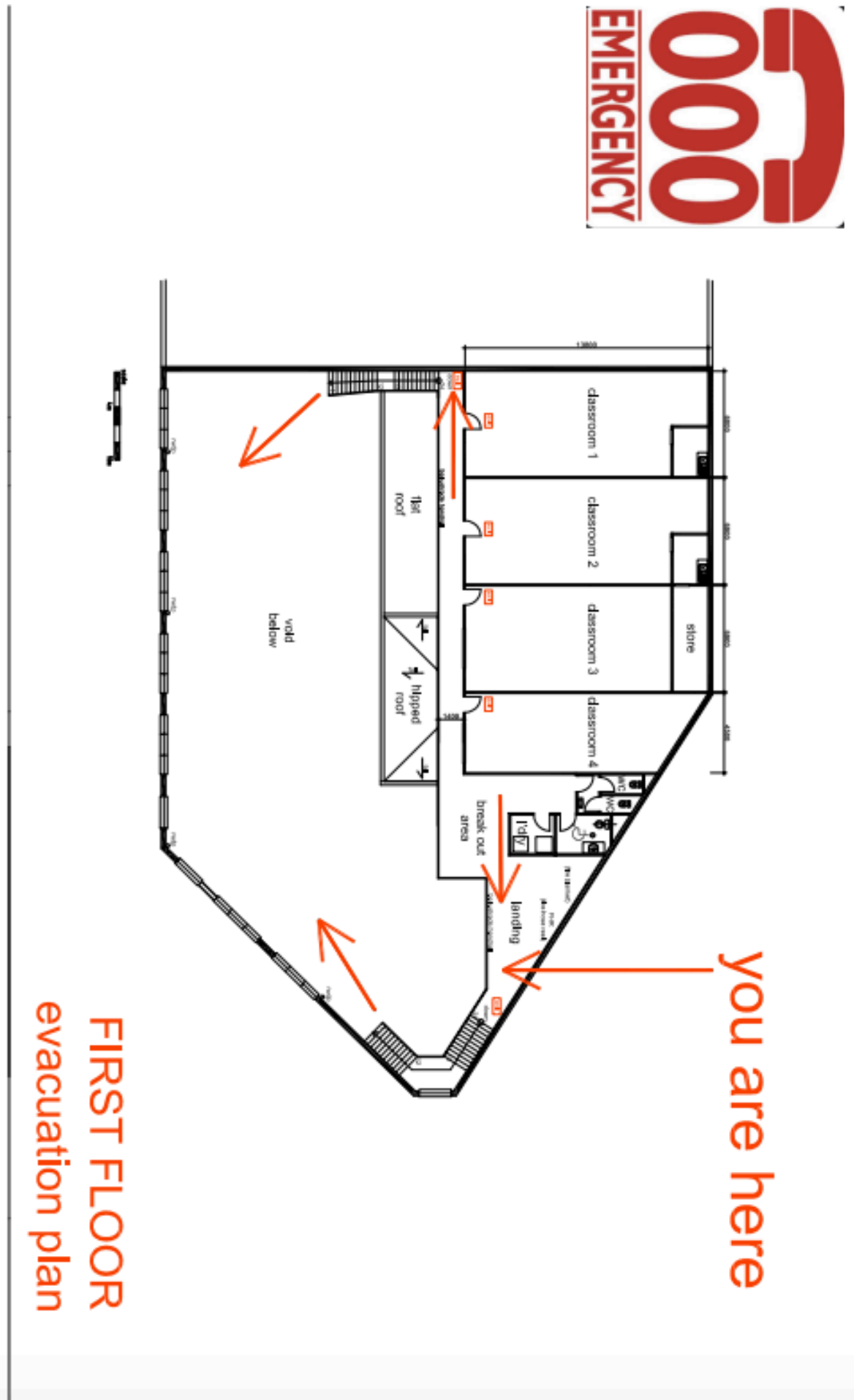


Appendix D

Melbourne Campus Evacuation Plan



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Appendix E

Student death notification plan

In the case of a critical incident that results in the death of a student the CEO or delegated nominee will form a response team of nominated executive staff.

The key purpose of the response team is to:

- Assess risk and plan immediate response actions, by whom and by when
- Liaise with emergency and other services
- Allocate key action task responsibilities
- Notify key agencies and/or individuals
- Report and follow up.

Contacts may include:

1. The relevant Consulate as one of the first points of contact to clarify responsibilities.

The Consulate may be able to assist with:

- Contacting the student's family
 - Arranging a service
 - Arranging travel for relatives
 - Arranging temporary accommodation for relatives
 - Arranging repatriation of the body.
2. Department of Home Affairs and the Department of Education
 3. Student emergency contact and/or next of kin (emergency contact details from the Student file in the Student Management System: Meshed)
 4. Other students (those involved, friends)
 5. Hospital
 6. Counselling/support staff and services
 7. Media contact
 8. Teaching/academic and other relevant staff
 9. The Overseas Health Cover Provider
 10. Cultural or religious Leaders
 11. Legal Services.

The following privacy policies and legislation are followed when discussing confidential student details with other parties:

- The Australian Privacy Principles (APPs), which are contained in Schedule 1 of the Privacy Act 1988 (Privacy Act);
- State or territory legislation or other regulatory requirements, in relation to privacy principles, appropriate to the jurisdiction in which they operate
- **Privacy Policy**
- Provide counselling for students and/or staff not directly involved in the incident
- Maintain considered records throughout the process
- Communicate and/or send applicable condolences
- Review critical incident procedure and associated policy
- Procure a copy of the death certificate or other required documentation

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- Funeral or memorial service arrangements (as applicable)
- Repatriation arrangements (as applicable)
- Notify staff and other students of memorial or similar service/gathering (subject to family approval)
- Update Student Management System to reflect the student status of deceased to avoid sending further student communication
- Update the Provider Registration and International Student Management System (PRISMS)
- Arrange student possessions to be stored or sent to their family
- Resolve any outstanding tuition fees owed by the student or arrange reimbursement to nominated representative/s
- If the student was a victim of crime and their family is resident in Australia, financial assistance may be applied for through the relevant state victims of crime association.