



Critical Incident Policy

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Part A: Policy

1. Purpose and Scope

Policy and procedures to manage critical incidents are expected of organisations and mandated by government regulations, notably the *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007* (The National Code 2007) and the *ESOS Act 2000*. Consequently the ACT is required to be satisfied that colleges have such instruments in place. This document provides requirements and guidance to college Principals to develop or review such policies and procedures for each of their colleges.

Whilst government regulations focus on critical incidents affecting students, policy should cover all likely victims and also be part of the risk management plan of an organisation. The ACT advises against having multiple instruments serving similar purposes and instead recommends that the obligations set by the National Code be integrated into college risk management plans.

Critical incidents are likely to be infrequent to rare and consequently provide limited opportunity to acquire expertise by experience. Also critical incidents are often emergencies and time is critical, so this policy focuses upon essentials rather than attempts to be comprehensive in coverage. The onus is on colleges to adapt this advice in a way that enables them to respond best to their circumstances.

A critical incident may be defined as an event which results in serious harm to persons or property often accompanied by trauma affecting victims and participants.

2. Policy Level

Management / Operational

3. Background

This policy is part of the larger risk management framework of the ACT and each college.

The ACT is registered by TEQSA for the provision of educational services to Overseas Students. Consequently the ACT and its affiliated colleges approved to deliver ACT courses to overseas students is obliged at all times to comply with the *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007* (The National Code 2007) and the *Educational Services for Overseas Students (ESOS) Act 2000*. The preamble to and the content of Standard 6 refer to the need for a registered provider to have a documented critical incident policy in the following terms:

6.4 The registered provider must have a documented critical incident policy together with procedures that cover 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.

4. Definitions

A **critical incident** is as an event which results in or has the potential to cause serious harm to persons or property often accompanied by trauma affecting victims and participants. A threshold for the adjective critical could be where expert medical attention or professional counselling is required or the cost of structural repair is substantial.

The **ACT** or **College** is the abbreviation for “the Australian College of Theology”.

college is the abbreviation for an institution affiliated with the Australian College of Theology.

staff are members of the academic and general staff at a college affiliated with the ACT

overseas student is a student who is in Australia on a student visa enrolled with the Australian College of Theology through its affiliated colleges

responsible person is person designated a supervisory role and responsibility in respect of an incident

emergency services consist of the core services (police, fire and rescue services, emergency medical services including ambulance) summoned by a dedicated emergency telephone number.

5. Principles

(A) Benefits of this policy and procedures

A1. Procedures should ...

- (a) reduce the likelihood of critical incidents,
- (b) enable incidents to be managed efficiently and compassionately
- (c) prevent further harm and promote recovery
- (d) facilitate continuous improvement
- (e) reduce the risk of independent action

(B) Possible Critical Incidents

B1. Critical Incidents may include but are not limited to the following, whether they occur on-campus or off-campus, during or after normal hours of college activity:

- Acts of violence or threatening behaviour
- Natural hazards or man-made disasters or potential disasters
- Site invasion that leads to harm whether by intent or not
- Accident onsite or offsite
- Acts of self-harm or social irresponsibility
- Structural failure of building or equipment
- Riot or affray
- Onset of physical or mental illness
- Witnessing a critical incident affecting third parties including accident, assault, injury, death
- Person or persons missing and presumed to be at substantial risk
- Arrest
- Acts or omissions of staff, students and/or contractors
- Being the victim of a crime – robbery, assault

(C) Overseas students

C1. Overseas students should be offered special consideration because of less familiarity with local circumstances and institutions and the absence of a personal support network.

(D) Roles of ACT colleges

D1. This policy recommends colleges define responsible persons to supervise the management of critical incidents and ensure the welfare of students and staff.

D2. In order to comply with the *National Code 2007* the ACT is obliged to require colleges to keep records of critical incidents including but not limited to the nature of the incident, the way in which it was managed and the follow up actions that took place to complete the recovery.

D3. Since the threshold for defining a critical incident is hard to set and the *Code* does not appear to have been formulated with consortia in mind, efficiency in reporting would suggest the following practice be adopted: colleges must put in place procedures whereby they can supply on request the information specified in the *National Code* and they must inform the ACT promptly of any particularly serious incidents.

6. Policy Content

(A) Disclaimer

- A1. This document provides guidance on procedures to adopt in handling critical incidents but does not restrict the scope or power of college executives to adapt or modify them as seems appropriate. Advice from specialist organisations is readily available on emergency management and risk management and should be consulted. Moreover, government regulations specify requirements and procedures relating to a variety of risks, eg fire, flood, etc., which are likely to be incorporated in risk management plans.

(B) Roles and responsibilities in colleges

- B1. The college should incorporate the critical incident policy within its risk management framework.
- B2. The college should bring their critical incident policy and procedures to the attention of staff and students at the time of their orientation or induction to the college.
- B3. The college should include in the procedures for dealing with critical incidents the following:
- (a) Mechanisms to reduce the likelihood of occurrence of a critical incident, ie basically risk management plans.
 - (b) Designate the person with responsibility for oversight and authority of a critical incident. Such person would usually be the CEO (Principal) but the supervisory responsibility may be delegated to a person with known capability. The person designated should be self-controlled, able to think clearly and respond decisively and keep the CEO informed. The Principal may establish roles for particular staff, form any teams that seem appropriate and delegate responsibilities to personnel with appropriate expertise. Colleges may find it helpful to establish a team of responsible people to strengthen the response capability.
 - (c) Reporting and communication systems that provide information flow up and down the line of command, and include assembly points made known to on-campus personnel. It is important to avoid confusion and ensure the coordination of decisions and actions in the event of an incident.
 - (d) Mechanisms that ensure personnel who first identify an incident know who to report to and are aware that they should avoid actions that compound risk. This may include training programs.
 - (e) Personnel with competencies likely to assist with incident response, e.g. those with first aid qualifications, technical skills, etc
 - (f) Contacts for expert advice: medical, fire, SES, police, counselling
 - (g) An aide to the person in charge can be helpful in recording responses and checking against established procedures, and passing such records to the Registrar. The Registrar should normally be responsible for ensuring a report is compiled and records maintained.
 - (h) Mechanisms to identify follow up procedures for affected parties to an incident in a way that brings finality.
 - (i) Scheduling of debriefing and formulation of recommendations arising from the incident review

Staff and students are responsible for ...

- (a) following the critical incident procedures published by their college
- (b) knowing to whom they report an incident or the potential for an incident
- (c) not placing themselves or others at risk of injury or other trauma
- (d) supporting those with overall responsibility for oversight of the process

- (e) availing themselves of the support mechanisms in the event of exposure to a critical incident

(C) Responsibility of the ACT Office

- C1. The ACT office and/or Academic Board is responsible for determining any amendments that may be appropriate for a student’s study and assessment program, and will act on any recommendations made by the college.
- C2. The ACT office or Academic Board may also act in regard to any staff matter for which the ACT has responsibility and will act on any recommendation by the college.

7. Associated Documents

(A) National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 (The National Code 2007)

https://www.aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Documents/National_Code_2007_pdf.pdf

(B) ISANA Critical Incident Kit

<http://www.isana.org.au/files/ISANACriticalIncidentsKit.pdf>

This kit is intended to serve as a useful resource for ISANA members handling critical incidents in the International Student Community.

8. Responsibility and Authority

Body/Position with authority to initially approve the policy and procedures and amend the policy:

Board of Directors / Dean

Body/Position(s) with delegated authority to amend the procedures consistent with the policy:

Dean / Principals of colleges

Body/Position(s) accountable for:

Responsibility	Position
Development of the policy	Dean
Provision of advice in development of the policy	Dean, Director of Academic Services, college Principals & Registrars
Distribution of the policy	Dean
Implementation of/Advice concerning the policy	Dean / college Principals & Registrars
Monitoring of and compliance with the policy	Dean
Evaluation and recommending amendment of the policy	Dean

9. Approvals

Document Title:	Critical Incident Policy	Document Number:	DIR1006-8.4
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Authority	Action	Resolution No.	Date
Board of Directors	Approval of Revision	DIR1412-18.1	8 Dec 2014

10. Communications

Date	Recipient	Purpose	Mode
14 Aug 09	College Principals & Registrars	Request for provision of advice concerning Version 1 of the policy draft – responses due 25 Aug 09	Email
9 Oct 09	College Principals & Registrars	Request for provision of advice concerning Version 2 of the policy draft – responses due 30 Oct 09	Email
14 Dec 09	Directors	Final version following above advice	Board
7 Jun 10	Directors	Revised final version considered and approved with minor amendments	Board
26 Aug 10	Quality Manager	Deliberation with R. Cardew to include amendments	Email Phone

Part B: Procedures

1. Introduction

(A) Student File Essentials

For the purposes of managing incidents student files should normally contain:

- Coloured Photograph
- For overseas students a copy of the title and Australian visa pages of their Passport
- Student's religion
- Emergency contact telephone numbers, with next of kin details, agent or sponsor (as applicable)
- Any other significant personal details – student ID, course details, medical conditions, allergy information, etc.
- Medical insurance status

2. Procedures

(A) Preamble

The following procedures are indicative, provide guidelines and should be adapted to college circumstances.

(B) Action by witness or directly affected party

B1. A person who witnesses an incident or is the first contacted shall ...

- (a) contact the Principal or responsible person
- (b) act as directed by the responsible person
- (c) if directed or in the absence of obtaining immediate access to the responsible person, contact emergency services as soon as it is safe to do so
- (d) take immediate action to minimise the risk of further injury or damage
- (e) act to protect the safety and welfare of witnesses
- (f) assess the situation carefully and gather information

(C) Action by responsible person (i.e. Principal or designated person)

C1 The responsible person shall ...

- (a) maintain oversight of the incident
- (b) arrange for expert help as required

- (c) establish communication systems to keep affected parties informed, including family and friends during the incident and throughout the follow-up period
- (d) direct others to assist in the management of the incident
- (e) ensure appropriate effective support is provided to affected parties
- (f) protect the site or anything associated with the incident in case an the matter is investigated by the Police or other government agency
- (g) set up a recovery room with appropriate furniture and resources if appropriate
- (h) gather relevant information about the incident and interview affected parties
- (i) assist staff/students to contact their family/close friend(s) to advise them of the situation and provide other assistance as necessary and appropriate
- (j) assist members of the public to contact their family/close friend(s), and assist them as appropriate, perhaps by arranging transport for them
- (k) inform the Principal and the Registrar and Dean of Students of the situation
- (l) if the incident has impacted an overseas student, inform the Overseas Student Contact Officer for the campus
- (m) debrief those who worked on the incident
- (n) establish a means of keeping affected parties informed without compromising legal, insurance or reputational liability.
- (o) prepare or arrange for the preparation of a Critical Incident Report. The Registrar would normally be responsible for seeing that this was completed satisfactorily and kept on file.
- (p) Assess implications arising for risk mitigation and arrange for their implementation

(D) Action by the Registrar or person designated by Registrar

D1. The Registrar, or designated responsible person, shall ...

- (a) assist in the documenting of the incident and preparing the incident report
- (b) assess the implications for an affected student's study and assessment program
- (c) under the direction of the responsible person manage the follow up procedures
- (d) contact the ACT Dean or his delegate, advising of matters relevant to ACT responsibilities and submitting the Incident Report when completed as appropriate
- (e) arrange for any necessary notification to relevant educational and government bodies, e.g. DIAC, Consulate/Embassy, etc
- (f) monitor or assist the Principal in monitoring investigations by any external agencies
- (g) maintain a complete record of critical incidents

(E) Action by the Principal if not the responsible person

E1. If the Principal is not the responsible person, the Principal shall ...

- (a) Contact the ACT Dean, as appropriate, and confirm his knowledge of the incident and action being taken or completed
- (b) receive the Critical Incident Report
- (c) consider any recommendations
- (d) manage relations