

Critical Incident Policy and Procedure

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Document Properties

Document Name	Critical Incident Policy and Procedure
Policy Owner	Principal
Issue Date	01/03/2018

Version Control

Date	Summary of Changes	Review date
01/03/2018	New Policy	
7/10/2019	Addition of U18 welfare disruption and monitoring, child abuse, mandatory reporting and counselling. Changes reflecting changes updates in staff positions.	10/10/2021
13/02/2024	Contact details and staff roles updated. Use of Ticketondemand replaced by Donesafe	13/02/2025
07/06/2024	Details of security contractor and Homestay provider added to policy.	07/06/2025



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Purpose and Scope

Purpose

The Critical Incident Policy and Procedure is designed to ensure that the safety and interests of all Hawthorn-Melbourne (H-M) students and staff are managed appropriately in the event of a critical incident.

Scope

This policy applies to all visitors, staff and students at the Hawthorn-Melbourne campus at Levels 1 and 2, 333 Exhibition Street, VIC 3000.

Where H-M staff witness an event that may be considered a critical incident, this policy and procedure should be followed. For any incidents occurring off campus but involving or impacting H-M staff or students, this policy applies.

Critical incidents may affect infrastructure, administrative systems, intellectual property, equipment and programs as well as staff, students and visitors. This policy does not apply to cases of minor injury or academic misconduct.

This policy and procedure is circulated to campus staff, including security staff, as part of induction. Students are made aware of the policy during orientation and can access it via the <u>Hawthorn-</u><u>Melbourne website</u>.

Critical Incidents

A critical incident is a sudden, unexpected and potentially traumatic event outside the normal range of experience of the individual or community affected but having the potential to cause death, injury, severe emotional stress or distress, destruction, loss of property, shut down or disruption of business operations. A critical incident may occur on or off-campus.

These are incidents relating to but not limited to:

- Fire, explosion, gas leak
- Chemical, radiation or bio-hazard spillage
- Incidents involving serious physical violence
- Serious accidents
- Death, serious injury or any threat of these
- Natural disaster
- Outbreak of disease/pandemic
- Missing students
- Natural or man-made disaster
- Socio-political disruption
- Social issues such as domestic, drug or alcohol abuse

Responsibilities

Critical Incident Management Team (CIMT)

The CIMT will be responsible for the formulation, implementation and management of the critical incident response and resource allocation. The CIMT will maintain relationships and liaise with any other appropriate external organisations including emergency services, the Chief Warden and Navitas senior management, and with pathway partners whose students may be impacted. The CIMT will consist of, but will not be limited to, the following staff members. These staff members will undertake the roles described below or will undertake tasks specifically assigned to them by the Principal. CIMT members should be ready to work across a number of roles if necessary.

The following staff members are part of the CIMT:

- 1. **Principal** Assumes overall management of critical incidents, formulates a crisis management plan, convenes CIMT where necessary, designates roles and responsibilities to each CIMT member and mobilises resources as required. Briefs the Chief Warden and others detailed in the procedure as necessary.
- 2. **Student Services Manager** Supports the Principal. Coordinates student liaison and support activities including counselling designed to minimise aftermath, ensuring that all people affected by the incident have access to trauma counselling/debriefing services. Organises interpretation services if required. Oversees communication plan for students/relatives and homestay hosts in consultation with Principal and key Navitas staff.
- 3. **Directors of Studies, EfHS Coordinator and Senior Teachers** Work with the Principal & Student Services Manager, communicate with academic staff and students internally as necessary, manage Teachers, coordinates program and timetable changes, and substitutes staff where necessary
- 4. **Business Development Manager and Assistant Marketing Manager** Assist the Principal and liaise with key Navitas staff regarding the media response and all communications directed to agents. Provide official media spokesperson with all relevant information. Provide a contact point for Agents.
- 5. **Admissions Manager** Assists with providing records of students involved in critical incidents, next of kin details, agent/homestay family contact details. Assists with urgent communications to DHA, University of Melbourne and other pathway partners.
- 6. **First Aid Officers** Staff members who have undergone first aid training.
- 7. Staff members trained in **mental health first aid**.

Note: In responding to a critical incident, any H-M staff member may be deployed to assist the H-M CIMT as required.

Designated Officer

The Designated Officer is any Hawthorn-Melbourne staff member who is either a witness to, or first to be informed about an actual or potential critical incident. The Designated Officer is to assume responsibility for alerting the Principal & Student Services Manager or another member of the Critical Incident Management Team (CIMT). 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, H-M security and alerting other staff, assisting with first aid, crowd control etc)..

Escalation Hierarchy

Every critical incident is unique and may need to be dealt with differently, according to the needs of people affected and severity. The table below serves as a risk guideline and escalation hierarchy when assessing a critical incident. Most CIMT team members work as a group responsible for their respective campuses as onsite employees but as per the table below, the CIMT will liaise with senior levels of Navitas' divisional management when severe-risk incidents occur or have a potential to occur. The escalation hierarchy are to be contacted and informed in conjunction with the Critical Incident Procedure in section 6 below i.e. the Designated Officer may contact emergency services and H-M security in the first instance and depending on their initial assessment of the situation.

Level of Risk:	Staff involved in/informed of response:	Examples
Severe (critical incident)	UPA CEO UPA Executive General Manager Head of Human Resources Head of Workplace Health and Safety Director, English & Testing Principal Director of Studies Student Services Manager	Death, suicide, severe/life-threatening injury, deprivation of liberty, assault, rape/sexual assault and harassment, serious burglary, use of firearms, threat of wide-spread infection and/or contamination, fire, bomb, explosion, gas/chemical hazard.
Significant (possible critical incident)	Principal Director of Studies Student Services Manager UMELBP Coordinator EfHS Coordinator Senior Teachers Admissions Manager Business Development Manager Marketing Manager	Significant health and safety risk, significant injury incurred by either staff or student, suspicious package unattended, threats of violence, evacuation of building, missing student, incident involving U18 student, welfare arrangements disrupted for U18 student.
Moderate (not a critical incident)	Director of Studies Student Services Manager First Aid Mental Health Officers First Aid Officers	Health and Safety Risk, petty theft, illness or moderate injury of staff or student.

Immediate Incident Escalation and Reporting Policy

The Navitas Group has a separate, stand-alone policy that covers all Navitas divisions, business units and functions: Immediate Incident Escalation and Reporting Policy. This Navitas Group policy, available on the Navitas Policy Hub, provides additional policy and process on the escalation and reporting of incidents that involve risk of:

- Moderate and major reputational damage
- Moderate and major regulatory investigations or breaches
- Significant operational or supply chain disruptions
- Material litigation claims (resulting in losses of more than AUD \$150,000)
- Material customer client issues (resulting in losses of more than AUD \$500,000)
- Material whistle-blower report
- Major cybersecurity incident or privacy breach
- Fraud
- Significant negative public media coverage
- Environmental harm
- Significant event causing harm to indigenous cultural heritage and/or culture
- Significant event causing harm to local communities
- Notification of significant public protest or demonstration
- Other incidents likely to cause catastrophic consequence

Critical Incident Procedure

As every critical incident is unique, the type of event, impacted cohort and surrounding circumstances will dictate whether emergency services, H-M Security or the CIMT are notified first. In any case, initial communication should include the type of incident, the exact location, and details of any person or persons who might be injured, in distress, or at risk.

Below is the standard process for the initial response to a critical incident:

- 1. The Designated Officer (see definition) is to assess the situation and consider any risks to their own or others' safety. If there is a threat to anyone's safety or the safety of students and other staff around, they are to be alerted and removed to a safe location. If the situation is life-threatening, emergency services are contacted at the first opportunity. Every effort must be made to contact the CIMT members once it is safe to do so.
- 2. If the situation is not life-threatening, the Designated Officer's own judgement is to be used. The Designated Officer or delegated staff member should notify the CIMT and/or H-M security, who in turn reach out to relevant emergency services as required.
- 3. Where the Designated Officer considers a critical incident to be apparent or likely, they must alert a CIMT member, preferably the Principal as the overarching campus manager.
- 4. After alerting the relevant person/s and provided there is no threat to personal safety in doing so, the Designated Officer is to assess the practical needs to stabilise the immediate environment.
- 5. The immediate response to any critical incident will be the assessment, planning and the rapid implementation of intervention needs. When notified by the Designated Officer, the Principal or another member of the CIMT is to assume responsibility for re-assessing the incident and for convening a meeting of the CIMT if deemed necessary where the task would be to:



- Develop a profile of the incident: What has happened? Who has been affected by the incident? How might it have affected them?
- Decide on the range of supportive actions which can be offered to students and/or staff members affected by the incident. This may include:
 - Notification of support services for both staff and students (within the first few hours)
 - Establishment of a quiet area for the use of victims and/or their families. This area will be protected from intrusion by anyone not immediately involved in the incident.
- Evaluate which individuals/organisations need to be involved and what their roles might be.
- Re-establish a sense of personal control, by considering linking students to parents/care givers and significant others.
- Decide: when, how and what to communicate to parents, staff and students regarding the incident. This may include: briefing staff and establishing a central information point to provide up-to-the-minute, accurate information to staff, students, and families.
- Advise Navitas senior management of the incident. If relevant, direct all enquiries from the media to the Corporate Communications Team (mediaandcomms@navitas.com) as per the <u>Media, Social Media and Speaking Policy</u>.

Assessment will be ongoing until the incident is resolved.

Evacuation

The H-M campus is equipped with an automated alarm which will be used to warn people in an emergency. Upon hearing the evacuation alarm, staff and students are asked to be aware that there is a real or potential emergency in the building. Upon hearing the alarm or upon being instructed to evacuate, staff and students should obey any directions given by fire wardens and assemble at the nominated emergency evacuation point.

H-M's evacuation point is the corner of Exhibition Street and Victoria Street in front of the Royal Society of Victoria building. Staff and students are made aware of the location of this assembly point in orientation and onboarding, via evacuation diagrams displayed on the campus and during fire and evacuation drills.

At all times, staff and students are required to follow instructions from emergency services personnel (police, fire brigade, ambulance). Students under the age of 18 must be supervised by a teacher.

Missing Students

<u>H-M's Attendance Policy</u> describes the process for recording absences and reporting on attendance. While most student absences are innocuous in nature, extended absences should be considered critical if, despite repeated attempts by a range of stakeholders, the student remains uncontactable. The urgency increases when a student is under 18 years of age.

The State Government's <u>Report a Missing Person webpage</u> provides guidance on how and when to report a missing person. Communication with emergency contacts/parents of a student should form part of this process.

Under 18 students

In the absence of a parent, a legal guardian or a suitable relative, H-M assumes full responsibility for the accommodation, support and general welfare arrangements of students under the age of 18. The potential for critical incidents relating to this age group is significant and therefore they require an extra level of care.

Beyond tracking absences closely, the CIMT must be contacted immediately where a H-M staff member becomes aware of, or has reasonable justification to suspect that, an under-18 student has been involved in any incident or allegation involving actual or alleged sexual, physical, or other abuse. The authorities must be notified as per state legislation required under the child mandatory reporting laws.

If H-M is made aware that welfare arrangements have been disrupted for students under 18 years of age, the onus is on H-M to urgently resolve this issue in line with the Critical Incident Procedure. For example, if the situation necessitates that the student be removed from their usual place of living, H-M will liaise with its accommodation partners to prioritise rapid placement on the student in new accommodation. If need be, H-M will place the student in suitable emergency accommodation until such time as a more permanent solution has been found.

H-M partners with the Australian Homestay Network (AHN) and Student Accommodation Services (SAS) as the approved homestay providers for U18 students. AHN has a 24/7 emergency support line and documented policies for managing <u>critical incidents</u> in addition to an <u>AHN sexual harassment and abuse prevention policy</u>. SAS also has a 24/7 emergency support line and documented policies for managing critical incidents in addition to an SAS sexual harassment and abuse prevention policy.

Sexual Assault and Sexual Harassment (SASH)

Instances or allegations of SASH are considered a critical incident and categorised a severe risk as per the escalation hierarchy table in this policy. The procedure for such cases may differ from the general incident procedure in Section 6 of this policy in order to apply the appropriate levels of confidentiality and safeguard the wellbeing of those involved.

SASH training is a mandatory requirement for all H-M employees and training is conducted online via HR shared services as part of a prevention strategy. Managers and key staff have a duty to prevent SASH and may be held responsible unless all reasonable steps have been taken to prevent or eliminate an issue.

Reporting – all staff have a responsibility to:

- report any incidences of SASH that they witness to a CIMT member, preferably to the Principal as overarching manager
- respond to all complainant's calls for assistance and report to a CIMT member, preferably to the Principal as overarching manager
- maintain confidentiality of information provided during an investigation of a complaint

Witnessing a person experiencing SASH – all staff:

should refuse to join in with any sexually harassing behaviour



- can support the person to say no to the harassment
- can offer to act as witness

What a victim of SASH can do:

- If possible and if they feel able to, promptly speak to the offender directly or in writing to say their behaviour is offensive and unacceptable and request it stop immediately.
- Report and seek advice from management staff.
- When harassers seem dangerous (e.g. they are refusing to leave the premises and/or demonstrating threatening behaviour) call for CIMT members or campus security to contact the police.
- Lodge a complaint to management staff who will act upon the complaint.
- Log a report on <u>Speak Up</u> portal

Once a SASH incident has been reported to management, the relevant CIMT member should take action to ensure the immediate safety of the complainant and any other stakeholders, ensure appropriate confidentially is maintained, and report the incident as per the escalation hierarchy in Section 4 of this policy. Thereafter an investigation will ensue.

Post Incident Management

The CIMT, in conjunction with Navitas divisional managers depending on the significance of the incident, will convene within 48 hours following a critical incident to determine what follow-up procedures must be implemented in the areas of counselling, information dissemination, debriefing and the continued allocation of personnel. Post incident management responses may include:

- Disseminating information to all staff, students and their families of the incident in cases where the incident is of concern to H-M and establishing post-incident communications and processes
- Monitoring the need for counselling and maintaining contact with staff and students who are likely to need ongoing support
- Psychological debriefing of students and staff after the incident (except if legal processes contra-indicate)
- Notifying embassies and consulates
- Training workshops in stress management and coping strategies
- Liaising with the families of affected students. If necessary, interpreters will be appointed
- Arrangements for visits from family, including accommodation travel and expenses
- Liaising with police, hospital and other medical staff
- Funeral, memorial or repatriation service arrangements
- Death notices
- Administrative/enrolment matters including fee refunds
- Reporting a Student Course Variation on PRISMS to cancel student's CoE
- Assisting students with access to legal services
- Personal items and affairs (household and academic) of students
- Monitoring reactions within the campus, including significant dates and anniversaries
- Encouraging teaching and administrative staff to continue to be alert in recognising posttraumatic reactions



- Allowing opportunity for the campus community to continue to talk about the incident and their reactions and offering support where needed
- Disseminating regular and up to date information via email to the campus community
- Monitoring media coverage as this may continue to cause distress to staff and students

Post Incident Staff and Student Support

All H-M staff have access to an Employee Assistance Program on behalf of Navitas Ltd whereby free initial counselling if offered to employee and/or immediate family members. H-M ensures that there are trained first aid mental health staff and first aiders to assist both staff and students. H-M staff can also assist with third-party counselling services for staff and student to be referred to. H-M staff will assist students for any medical or counselling needs via their overseas medical insurance plans.

Review

Once a critical incident is resolved, the CIMT will evaluate the critical incident response which will form the basis of subsequent and improved responses. Staff and students will be encouraged to provide their thoughts and experiences in order to assist in the review process.

Keeping Accurate Records

H-M uses a WHS digital platform <u>DoneSafe</u> whereby staff are instructed to log detail of all incidents in addition to potential incident hazards. All staff undergo mandatory online training for these WHS aspects in their onboarding phase and the platform is accessible via the Navitas intranet and via QR codes which are displayed on campus. The platform can be accessed via mobile phones and laptop devices. Once submitted electronically, a member of the HR WHS team reviews the incident and contacts the sender for any necessary follow up actions. All incidents are filed for a minimum of 5 years.

Privacy

In accordance with the Privacy Act 1988 and National Privacy Principles, individuals are entitled to and shall be granted the protection of their personal and private information. However, H-M will exercise its discretion and may disclose information in the following circumstances:

If H-M reasonably believes that the use or disclosure is necessary to lessen or prevent a serious and imminent threat to public safety or an individual's life, health or safety.

If H-M has reason to suspect that unlawful activity has been, is being or may be engaged in, and uses or discloses personal information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities; or the use or disclosure is required or authorised by or under the law.

Key Positions and Contacts at H-M

Person	Position title	Summary scope for 24/7 contact	Out of hours contact
Sally Waite	Executive General Manager	Any – especially critical incidents	0427 677 472
Chris Jones	Director, English and Testing	Any – especially critical incidents	0458 105 432
Nick Kirk	Principal	Any – especially critical incidents	0490 442 579
Anne Simons	Admissions Manager	Any involving Admissions	0405 138 184
Alberto de Freitas	Manager Business Development	Any involving agents/marketing	048 216 1379
Kylie Wills	Assistant Marketing Manager	Any involving agents/marketing	0412 972 203
Robert Smeaton	Student Services Manager	Any involving accommodation, student services	0490 161 948
Tupur Chakrabarty	Director of Studies - UMELBP	Any involving General Programs	0430 159 153
ТВС	Director of Studies – General Programs	Any involving UMELBP	0410 578 229
Chris Anderson	EfHS Coordinator	Any involving English for High School	0437 371 020
John Cooper	EfHS Support	Any involving English for High School	0433 513 007

Emergency and Support Services

Campus Security	NAME Ravneesh Sharmaa EMAIL ravneeshsharmaa@gmail.com MOBILE NUMBER 0423 381 947 OR contact CBRE (see below)
CBRE – Facilities Management	NAME Imtiaz Mehdi EMAIL Imtiaz.medhi@navitas.com MOBILE NUMBER 0407 012460
Colliers Real Estate – Building Managers	NAME Michael Turner EMAIL Michael.Turner@colliers.com MOBILE NUMBER 0402 656451 NAME Zalman Werdiger EMAIL zalman.werdiger@colliers.com MOBILE NUMBER 0447 359 354
Navitas 24-hour emergency number – for students	1800 NAVITAS
Emergency Services	

000
132 500
1800 123 400 Australian National Security
The Alfred Hospital - 9076 2000
Royal Melbourne Hospital - 9342 7000
St. Vincent's Hospital - 9231 2211
Provides immediate expert health information 24/7 1300 60 60 24 <u>http://www.healthdirect.gov.au/</u>
1800 651 349 http://www.oshcallianzassistance.com.au/
1300 361 008
Call 13 11 14 or text 0477 13 11 14 or chat online: Lifeline Australia – 13 11 14 – Crisis Support. Suicide Prevention.
Call 1300 22 4636 or chat online: Beyond Blue 24/7 Support for Anxiety, Depression and Suicide Prevention – Beyond Blue
Call 1800 55 1800 or chat online: <u>Kids Helpline Phone Counselling Service 1800 55 1800</u> Includes services for 5 to 17-year-olds plus young adults 18 to 25-year-olds
1300 78 99 78
1300 845 745 https://griefline.org.au/
1300 651 251 suicideline.org.au
1800 806 292 http://sacl.com.au
1800 733 276
http://www.redcross.org.au/ 13 72 58
http://www.salvos.org.au/
1800 819 817
http://victimsofcrime.vic.gov.au
1300 363 350 http://www.funeraladvice.com.au/
1300 367 797
Amber Community Road incident support and education

VITS – interpreting services	9280 1900
Accommodation Services	
Australian Homestay Network (AHN)	1300 69 7829 www.homestaynetwork.org
Student Accommodation Services (SAS)	9485 1900 www.student-accommodation.com.au

Compliance

General

This policy is available to staff and students on the Hawthorn-Melbourne Website.

Breaches

Breaches of policy compliance may result in disciplinary action being taken against the offender.

Relevant Legislation

Navitas is a global organisation with the responsibility to maintain compliance with the laws within our host nations. All Navitas users are responsible for aiding Navitas in identifying relevant legislation and for complying with all relevant legislation.

Definitions

Unless the contrary intention is expressed in this Policy, the following words (when used in this policy) have the meaning set out below:

Term	Meaning
AHN	Australian Homestay Network – homestay partner
CIMT	Critical Incident Management Team
DHA	Department of Home Affairs (i.e. Immigration)
EfHS	English for High School course
H-M	Hawthorn-Melbourne
PRISMS	Provider Registration and International Student Management System.
SAS	Student Accommodation Services – homestay partner
SASH	Sexual Assault and Sexual Harassment
UMELBP	University of Melbourne English Language Bridging Program
UPA	University Partnerships Australia – a regional division of Navitas
WHS	Workplace Health and Safety

Related Documents

Emergency Evacuation Plan Student Code of Conduct Staff Code of Conduct Student Handbook Teachers Handbook Student Orientation Presentation Hawthorn-Melbourne Attendance Policy Hawthorn-Melbourne Attendance Procedure Media, Social Media and Speaking Policy Immediate Incident Escalation and Reporting Policy (Navitas Group) Sexual Harassment Prevention and Response Policy (Navitas Group)

Review

This Policy is reviewed annually by CIMT members, factoring in any changes to the regulatory compliance requirements, legislation, regulation and guidelines. This review process aims to ensure alignment to appropriate strategic direction and continued relevance to H-M's current and planned operations.