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## CRITICAL INCIDENT POLICY

### 1. Purpose

- 1.1 This policy provides the framework and rationale to plan for, respond to, and manage critical incidents, both on and off campus, to ensure Ikon Institute of Australia (Ikon) meets its duty of care in relation to any events that may occur affecting its staff and students.

### 2. Scope

- 2.1 This policy applies to workers, students, visitors, and clients of Ikon for critical incidents occurring at or affecting Ikon, including student placements and off-campus retreats.

### 3. Related Policies

This policy should be read in conjunction with the following documents:

- Risk Management Policy
- Health, Safety and Wellbeing Policy
- Sexual Assault and Sexual Harassment Policy
- Critical Incident Register
- Governance Guidelines
- Business Continuity Plan
- Privacy Policy

This policy and related documents can be accessed via the [Policy and Procedures](#) section of the Ikon website and in the student and staff policy libraries.

### 4. Definitions

**“Critical Incident”** is defined by the National Code 2018 as ‘a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury’.

**“Critical Incident Response Team”** means the group created within Ikon to plan and organise responses to critical incidents in accordance with the Critical Incident Management Plan.

**“Emergency”** means a sudden, unexpected event that requires an immediate response from internal and external emergency services. Emergency management is the development of effective incident response systems focused on controlling such events.

**“Emergency Services”** are the public organisations that respond to and deal with emergencies when they occur, especially the Ambulance Service, Police Service, Fire and Rescue Services and the State Emergency Services.

**“Risk Management”** is defined in the *Risk Management Policy* and, for the purpose of this framework, includes the coordinated activities to direct, control and monitor work health, safety and wellbeing hazards and risks.

**“Student”** means a person who has enrolled in at least one subject of a course at Ikon and retains an active status in that course.

**“Visitor”** means any person who visits an Ikon campus or Ikon clinic.

**“Worker”** means any person who carries out work for Ikon which includes:

- employees
- trainees
- volunteers and affiliates including visiting and honorary fellows
- work experience/placement students
- contractors or sub-contractors
- employees of a contractor or sub-contractor
- employees of a labour hire company assigned to work for Ikon

## POLICY

### 5. Principles

- 5.1 A critical incident is a sudden event or situation which may cause students and/or staff major stress, fear or injury and may be regarded as outside the normal range of experience of the people affected. For the purpose of this policy the following events are defined as critical incidents:
- serious injury or death (staff, student or visitor)
  - physical or sexual assault
  - violence or threats of violence
  - hold up, attempted robbery
  - sudden or unexpected death or suicide of a work colleague
  - natural disasters
  - fire, explosion, bomb threats
  - high publicity events or incidents
  - any incident that is charged with extreme emotion
  - any fatality, near fatality or incident likely to affect seriously a number of staff and/or students
  - serious traffic accidents
  - major theft or vandalism
  - threat of serious infection
  - incidents involving pain or abuse of children
  - incidents in which sights, sounds, or smells are distressing
  - storms/natural disasters
  - acute illness (physical or mental)
  - a student goes missing
- 5.2 A critical incident for one person may not be a critical incident for another as it depends on one's perception of vulnerability and amount of control over a situation. An incident that might not cause fear or extreme stress to a domestic Australian student may cause extreme stress or fear to an international student enrolled at Ikon.
- 5.3 Each critical incident shall be carefully assessed and managed in line with cultural sensitivities for the student(s) impacted and their families.
- 5.4 Critical incidents will be managed with the foremost goals of preserving life, the wellbeing of staff and students, protecting the organisation's property, and restoring normal operations as quickly as possible.

- 5.5 Appropriate support services will be made available to students and staff through any critical incident, including for international students who may be away from family or community support mechanisms.
- 5.6 Ikon is committed to providing a safe environment for students, staff and visitors and to protect its corporate resources and information. Preventive/ precautionary steps that shall be taken by Ikon include:
- regular maintenance and upkeep of all buildings, facilities and equipment
  - robust security measures in and around our campuses including secure access, lighting and security cameras (as appropriate)
  - establishment and resourcing of the Health, Safety and Wellbeing Committee to monitor and ensure safe practices
  - workers, students and visitors are encouraged to report any possible safety issues to management and/or the Health, Safety and Wellbeing Committee
  - reporting of suspicious activity and persons in or around our campuses
  - orientation programs for new students to include personal safety, emergency contacts and how to respond in an emergency
- 5.7 Ikon shall have effective processes for record-keeping and records management in relation to critical incidents, including a Critical Incident Register.

## **6. Roles & Responsibilities**

### **Board of Directors**

- 6.1 The Board of Directors, as the corporate governing body, has the ultimate responsibility for the oversight of the work health, safety and wellbeing management framework across Ikon.

### **Health, Safety & Wellbeing Committee**

- 6.2 The Health, Safety & Wellbeing Committee assists the Board of Directors to discharge its responsibility for oversight of health and safety management across Ikon by observing, implementing and fulfilling its requirements under work health and safety legislation.
- 6.3 The Committee has been delegated responsibility for the establishment, monitoring, review and evaluation of work safety related practices to support and sustain the management of work health and safety risks across the institution. The main function of the Health, Safety & Wellbeing Committee is to actively promote the health, safety and wellbeing of everyone involved in the activities of the Company and to facilitate implementation of measures to improve safety in Ikon's work and learning spaces.
- 6.4 The Health, Safety & Wellbeing Committee reports to the Board of Directors.

### **Executive & Senior Management**

- 6.5 The CEO has responsibility for the implementation of the work health and safety management framework across Ikon.
- 6.6 The Dean is responsible for ensuring the work health and safety management framework is implemented across academic operations in accordance with policy and instruction from the CEO.
- 6.7 Senior management, academic leaders, and other similar positions are responsible for the implementation of safety policies, procedures, programs and activities as part of the business and academic operations across all work and learning environments. Senior management are

required to demonstrate leadership and set an example for workers and students in work health and safety matters.

#### Workers, Students, Visitors & Others

- 6.8 All persons, including workers, students and visitors of Ikon, are responsible for taking all reasonable steps to ensure their own health and safety, and that of others who may be impacted by their actions or omissions.
- 6.9 Each person conducting activities behalf of Ikon, including students and visitors, are responsible for observing all safety rules and procedures which shall be issued as codes of practice, policies, procedures and all directions given to them in relation to work health, safety and wellbeing management.
- 6.10 All persons are required to report practices, conditions or hazards that could injure or harm themselves, others or their work and learning environments.

## CRITICAL INCIDENT MANAGEMENT PLAN

### 7. Prevention and Preparation

- 7.1 Ikon shall regularly identify and evaluate threats and potential crisis events to enhance preparedness for such events.
- 7.2 Ikon shall develop appropriate plans, systems and processes to ensure it swiftly and effectively responds to and manages critical incidents.
- 7.3 The availability of appropriate resources and the development of safety measures are to be monitored on a regular basis through the Health, Safety and Wellbeing Committee and relevant senior Ikon managers.
- 7.4 The following steps are to be taken to prepare in the event of a critical incident:
  - lock down procedures including safe and secure lockable rooms or escape paths in event of an intruder or armed person
  - emergency evacuation notices illustrating the location of assembly in the event of a fire or other similar situation prominently displayed
  - regular testing of building evacuations practice
  - new staff are made aware of the Critical Incident Management Plan as part of induction processes
  - emergency exits are clearly marked and kept clear of obstacles at all times
  - emergency wardens are to be appointed and trained regularly in emergency procedures
  - first aid officers are to be appointed and have current first aid certificates
  - backups of computer records are stored off-site and are retrievable
  - list of key Ikon personnel that are responsible for critical incident responses
- 7.5 The Student Experience Team shall maintain a contact list of all relevant community resources including:
  - medical authorities
  - police and other emergency services
  - religious leaders
  - ethnic group leaders

- consular representatives
- insurance agents/ companies
- interpreters
- counsellors

7.6 Staff members shall undergo periodic training to ensure they know how to respond to critical incidents, including:

- first aid training
- understanding the staff roles and responsibilities established in the Business Continuity Plan and this policy
- undergoing periodic drills of responses to various situations
- for senior staff, knowing how to establish a Critical Incident Response Team.

## **8. Managing a Critical Incident**

8.1 The critical phase is the time immediately after the incident has occurred, or the point in time when Ikon first becomes aware of the incident.

### **Notification**

8.2 When a critical incident occurs, the relevant Ikon Manager (e.g. the manager of the relevant function or business head) is to be informed of the incident immediately. Where a student or worker is injured or needs medical attention, the first step is to seek immediate medical attention.

8.3 The Ikon Manager shall then determine the circumstances of the situation and, if necessary, consult with the CEO and/or the Senior Management team to assign roles and responsibilities, including the establishment of a Critical Incident Response Team if required.

8.4 The Ikon Manager shall then take the following steps:

- confirm if the person involved in the incident is a worker or student
- record any details of the incident provided by the person who reported the incident
- plan an immediate response
- inform the CEO immediately if a student has died, has been injured or has an infectious disease
- allocate individual roles and responsibilities for ongoing tasks
- plan an ongoing strategy

8.5 In the case of an infectious disease or other public health incident, the State Health authority shall be notified, and the CEO shall act as the liaison point with the relevant State Health authorities.

### **Assessment**

8.6 The Ikon Manager, shall assess the situation and:

- confirm the identity of the people involved
- determine if evacuation or lockdown procedures are to be implemented
- ensure, where a student is injured, that the student is safe and receiving appropriate medical attention in a safe environment
- ensure that other students, workers, and visitors are safe
- 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 worker 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 in consultation with the CEO, extent of information that can be provided given the privacy considerations
- depending on the type of incident, the Ikon Manager shall discuss and plan an immediate response and ongoing strategy and allocate specific roles and responsibilities
- once the student or worker is not in danger and is receiving medical attention, resume activities if appropriate

#### Intervention

8.7 The Ikon Manager, shall make contact with the relevant people (the order shall be determined by the specific circumstance):

- if necessary, liaise with the police regarding notification to the student's/ worker member's family and other relevant matters
- ensure that the person's next of kin are informed and updated on the current situation and assure that Ikon shall arrange or provide support
- where the person is an international student, keep the family informed regularly and if necessary, arrange interpreter services for the family
- if the student is in hospital or critically ill, provide assistance in arranging appropriate transportation or accommodation for members of the family
- if a student dies or is critically ill, discuss with the family all issues related to burial, repatriation and/or memorial service
- in the case of a serious accident, illness or death of an international student, inform the relevant consulate and discuss the allocation of roles and responsibilities
- also, keep in contact with the student's accommodation provider and housemates, providing appropriate levels of information and support
- student and staff counselling and debriefing sessions arranged as appropriate

8.8 The Student Experience Manager shall keep in contact with the student and relevant others, such as by making frequent welfare-check calls to ensure that the student is receiving appropriate ongoing assistance with any medical conditions and counselling.

#### Investigation

8.9 To ensure that the incident is accurately recorded, the Ikon Manager shall:

- collect facts about the incident (e.g. injuries or damage sustained, any witnesses, information from the scene)
- assess if any procedures/ processes or gaps in information/ training may have impacted the incident
- determine the cause of the accident/incident including any contributing factors, external factors, resourcing issues, security measures or systems failure
- review work procedures, training, and/or safe operating procedures, and
- document recommendations and communicate results to relevant managers and

- request updating procedures accordingly
- more detailed requirements are provided in the Checklist in Appendix 1.

#### Follow-up

- 8.10 The Ikon Manager and the Wellbeing Coordinator shall monitor the need for counselling and other support for those affected by the incident and arrange for the necessary assistance as required.
- 8.11 If a student has died:
- discuss funeral arrangements with the student's family.
  - seek to accommodate the cultural and religious customs of the deceased's family.
  - establish a Critical Incident Response Team.
  - more detailed requirements are provided in Appendix 2.

## 9. Reporting

- 9.1 External stakeholders, students and staff who are/were involved in the incident, and the families and friends of students and staff are to be provided information on the critical incident.
- 9.2 The CEO shall coordinate communication to key stakeholders and the media. Other than the CEO, members of Ikon staff shall not communicate with the media concerning a critical incident unless they have prior approval from the CEO.
- 9.3 Ikon shall ensure that any information provided:
- is not misleading
  - does not breach Ikon's ethics and privacy policy
  - does not jeopardise or misrepresent police or legal processes
- 9.4 Written reports, signed and approved by the student where appropriate, are to be put on the student's file. Copies of this report may be sent to the student's family and relevant authorities if the student permits.
- 9.5 Standard 6.8 of the National Code 2018 requires that providers registered to deliver courses to international students shall 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.
- 9.6 In addition, the Educational Services for Overseas Students Act 2000 (ESOS Act) requires Ikon to notify the Department of Home Affairs and the Department of Education, Skills and Employment as soon as practical following a critical incident. Ikon shall also keep TEQSA fully informed of the critical incident.
- 9.7 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).

## 10. Monitor & Review

- 10.1 Non-identifying details are to be included in the Critical Incident Register and are to be reviewed by the Health, Safety and Wellbeing Committee at each meeting.

- 10.2 The Chair of the Health, Safety & Wellbeing Committee shall report to the Board of Directors each quarter on any critical incidents. The report shall include the Critical Incident Register with accompanying analysis and recommendations for improvement in safety practices as necessary.

## **11. Documentation & Record Keeping**

- 11.1 All records, both current and past, are to be stored in such a way that they can be accessed and retrieved upon demand.
- 11.2 Records storage and retention periods are as outlined in Ikon's *Records Management Policy*.

## **12. Publication**

- 12.1 This policy is published in the *Policy and Procedures* section on the Ikon website, and in the student and staff policy libraries.



## Policy Information & History

Policy Category	Governance, Health & Safety
Policy ID	HR007A
Approved by	Board of Directors
Date of Approval	23 November 2021
Endorsed by	Health, Safety & Wellbeing Committee
Date of Endorsement	4 November 2021
Previous Versions	1 February 2016
Next Review Date	October 2024
Government Legislation	<a href="#">Tertiary Education Quality and Standards Agency Act 2011</a> <a href="#">Higher Education Standards Framework (Threshold Standards) 2021</a> <a href="#">National Code 2018</a> <a href="#">Safe Work Australia Model Work Health and Safety Act</a> <a href="#">Safe Work Australia Guide to the Model Work Health and Safety Act</a> <a href="#">Safe Work Australia Model Work Health and Safety Regulations</a> <a href="#">Safe Work Australia Model Codes of Practice</a> <a href="#">Work Health and Safety Act 2011 (NSW)</a> <a href="#">Work Health and Safety Act 2011 (QLD)</a> <a href="#">Occupational Health and Safety Act 2004 (Victoria)</a> <a href="#">Occupational Health and Safety Act 1984 (WA)</a> <a href="#">Work Health and Safety Act 2012 (SA)</a>
Responsible Officers	CEO
Sources:	<p>In developing the resolution framework, Ikon considered the following documents:</p> <p>Tertiary Education Quality and Standards Agency, <i><a href="#">Guidance Note: Wellbeing and Safety</a></i>, 2019</p>
Benchmarking:	External referencing activities were conducted against comparable providers and best practice using publicly available information, including Western Sydney University, Kaplan Business School, Charles Sturt University, Australian College of Applied Professions, Australian Institute of Higher Education, and Australian National University.

## Appendix 1: Critical Incident Response Checklist

Critical Incident Type:		
Date:		
Name of Ikon Manager coordinating the response:		
Position at Ikon:		
<b>Incident response:</b>	<b>Tick When completed:</b>	<b>Notes (e.g. time of action, details to include in final report).</b>
Identify injuries.		
Identify damage to property.		
Call Police, Fire or Ambulance services - Triple Zero (000)		
Account for all staff, students, and visitors.		
Evacuate the site (if necessary).		
Form a Critical Incident Response Team.		
Allocate specific roles and responsibilities to staff.		
Gather adequate information about the situation.		
Communicate relevant information to staff and students (ongoing task).		
Communicate necessary information to the CEO.		
Record decisions and actions.		
Identify key business operations that have been disrupted.		
Submit to the Health, Safety & Wellbeing Committee.		

## **Appendix 2 – Procedure in Case of Student Death**

In the case that an incident results in the death of a student, the Ikon Manager shall form the Critical Incident Response Team. The responsibilities of this Team are to:

- assess risks 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
  - teaching/academic and other relevant staff
  - student associations
  - chaplain or priest
  - Department of Home Affairs, consulate, sponsor, agent, 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 Ikon
- 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

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

- 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.