

Policy and Procedure	
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Responsible officer	Manager International Education
Contact officer	Compliance Manager
Endorsed by	Continuous Improvement Committee
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1. Introduction

1.1. Purpose

ABILITY English recognises that appropriate infrastructure, preventative measures and support mechanisms must be in place to ensure the health and safety of all students, staff, contractors, volunteers and visitors on and off Campus while they are participating in ABILITY English-related activities.

Procedures for managing critical incidents are in place to ensure an effective approach in responding to critical incidents if they occur, including appropriate support and counselling services.

Students and staff are made aware of ABILITY English’s Critical Incident Policy and processes. This occurs during orientation for students and during induction and professional development for teachers. The policy is available for reference by staff and students via ABILITY English’s website.

Appropriate training and information resources are provided to staff.

1.2. SCOPE

This policy applies to:

- ABILITY English’s potential and current students and employers
 - ABILITY English’s Education Agents
 - ABILITY English’s Student Recruitment Partners
 - ABILITY English’s Business and Training Partners
 - ABILITY English Staff
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1.3. Legislative Context

This policy satisfies the requirements of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, Standard 6.

1.4. DEFINITIONS

ABILITY Education Pty Ltd trading as ABILITY English

Critical Incidents A critical incident is defined 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
- bomb threat, assault threats, fire
- death, serious injury or any threat of these
- natural disaster
- life threatening pandemic
- issues such as domestic violence, sexual assault, drug or alcohol abuse
- non-life-threatening events which are of a critical nature due to the effect it may have on a person or persons.

2. POLICY STATEMENT

Due to the broad range of events that can either become or contribute to a critical incident the identification of an incident, the location of incident and threat level to others must be easily and quickly identified.

These events can be broadly broken down into 3 groups;

- **Internal** - immediate threat ABILITY English campus/location, student/staff on excursion or ABILITY English business out of office
- **External** - no immediate threat to campus
- **Personal/Medical** – may occur on or off campus/office location

Each incident or event are identified as either;

- **Immediate Priority** requiring immediate evacuation (EV), lock down (LD) or emergency '000' assistance
- **Priority** requiring medical consultation, report to emergency services (police etc), support, referral, communication.

Group	Immediate Priority	Priority
Internal	Fire/smoke	Cyber Attack Data / records theft or loss Transport accident Serious assault and /or theft
	Bomb threat	
	Explosion	
	Siege	
	Structural damage	
	Water damage	
	Intruder with malice ie gun, knife	
	Terrorism	
	Serious assault	
	Biological	
	Chemical hazard	

	Gas leak Risk of Electrocution ie live wires exposed	
External		Natural disaster-earthquake, bushfire, flood, hurricane Severe weather/storms Transport accident Public disorder Terror attack Outbreak of war or civil unrest
Personal/Medical	Death staff / student Medical Emergency Poisoning Anaphylaxis- EpiPen use	Pandemic diseases Sexual assault/harassment Shock Suicide Domestic violence Depression/anxiety

2.1. Internal Incidents

On-campus Incidents

If the incident is on campus emergency services (000) and the Manager International Education will be contacted immediately. When the incident is identified as Immediate Priority, evacuation or lock down procedure will be actioned immediately.

Off campus

If the critical incident involves a student or staff member who is off campus, i.e. on an excursion, the person receiving the information must immediately contact emergency services and the Manager International Education, who will communicate to other staff and relevant persons as appropriate and action steps to support individual as appropriate.

2.2. External Incidents

If the critical incident involves a student or staff member who is off campus, outside of course/work hours or in the student's home country, the person receiving the information must immediately contact emergency services or the Manager International Education, who will communicate to other staff and relevant persons as appropriate and action steps to support individual as appropriate.

2.3. Incident Reporting

All reports will include as a minimum:

- date and Time of incident
- name of Manager Completing Information
- names and roles of persons involved or witness to (e.g. staff, student, other parties)
- nature of the incident (e.g. threat, accident, death or injury)
- detailed location of the incident
- action/s taken.

Reports will also include other information relevant to incident:

- injury suffered
- First Aid given
- emergency services involved
- referral to outside departments, agencies or professionals
- support offered or recommended.

2.4. International Students

ABILITY English recognises the unique needs of international students who may require additional support such as:

- interpreters
- communicating with relatives in other countries
- communicating with consulates/embassy
- communicating and/or reporting to the Department of Home Affairs as soon as possible after a critical incident.

The incident may affect visa conditions or the student's program of study and in the case of a student's absence from classes, return to their home country. When an international student sustains serious injuries or dies, ABILITY English will work closely and respectfully with the student's family to provide necessary and appropriate support. This may include, but is not limited to:

- hiring interpreters
- supporting the family in arrangements for hospital/funeral/memorial service/repatriation
- supporting the family in obtaining a death certificate
- assisting with personal items and affairs including insurance issues

- providing contact details for the Department of Home Affairs and/or appropriate agent for assistance with visa issues
- in addition, ABILITY English will notify all relevant and authorised parties, including but not limited to, the accommodation provider, delivery partners and providers of services such as library and internet/computer access.

2.5. Management of Incidents

Immediate priorities in the management of any incident will be primarily:

- identify nature of incident
- depending on nature of incident action evacuation or lock down procedures
- activating emergency assistance
- provision of first aid or medical assistance if required.

And then

- information gathering
- reporting to appropriate authorities
- access to and provision of relevant support services.

The release of information to the press or public rests with the ABILITY Education Pty Ltd CEO or formal delegate and must comply with the requirements of privacy legislation and other legal requirements. The ABILITY Education Pty Ltd CEO or the Critical Incident Team will identify a staff member as a single point of contact for all media and other public communications (Media Coordinator). It may be necessary to check with the police, ambulance or fire brigade or other emergency services before making a statement.

No staff are to speak to media or make any kind of formal statement regarding the incident unless authorized by senior management.

The Manager International Education or delegate will convene a meeting with relevant staff and support services personnel who will constitute the Critical Incident Team. In particular situations and as required assistance will be sought from other staff with responsibilities for occupational health and safety, first aid, fire wardens, counselling, and public relations.

2.6. The Critical Incident Team

The Critical Incident Team are responsible for ensuring all such incidents are managed appropriately.

The Critical Incident Team will enlist the assistance of other staff or agencies or services as deemed appropriate to ensure timely and effective management of the incident in the interests of the students and/or staff, and the business partners.

Approved incident forms and checklists will be used to ensure communication and management of the incident as well as consistent and complete record keeping.

The priority of the Critical Incident Team will be:

- to identify the facts to the best of their abilities, what is known and what is not known
- identify persons involved in the critical incident
- to determine how to gather more information
- to develop and implement a plan for responding appropriately in a timely manner
- to develop and implement a plan for communicating with all relevant persons / stakeholders including as relevant: family members, staff, students, agents, police, medical services, consuls, the Department of Home Affairs, other providers, media.

The Critical Incident Team will have ongoing responsibility for:

- ensuring staff, students, family, authorities and services are kept informed in a timely and appropriate manner
- follow-up support services
- review and analysis of the response to the incident regarding the appropriateness in the circumstances, interests of the students, staff, family, ABILITY English and delivery partners.
- appropriate services and assistance being engaged to assist with the management of the incident
- ensuring appropriate and timely documentation and reporting of the incident and the response to it
- confirming that all legal responsibilities of ABILITY English are considered and met.
- ensuring Privacy and Confidentiality are maintained at all times throughout the process

2.7. Staff Awareness Training

It is essential that all ABILITY English staff who come in contact with students be made aware of the existence of this Critical Incident Policy and Procedure.

Staff will be provided with appropriate and sufficient training to enable them to manage the implementation of this Critical Incident policy and its associated procedures. ABILITY English will ensure that awareness of the Critical Incident policy is included in staff induction.

All ABILITY English staff will be made aware of all relevant community resources in the immediate local area. These include, but are not limited to:

- Emergency services

- Police
- Medical authorities
- Religious leaders
- Cultural associations/community groups/societies
- Funeral Directors
- Embassy or Consular representatives.

2.8. Material Change

In the event of an incident which significantly affects ABILITY English's ability to comply with the VET Quality Framework the Australian Skills Quality Authority (ASQA) will be notified as per EDN-015-I-POL Notification of Material Change Policy and Procedure.

3. PROCEDURES

1. Identify incident and priority level
2. If required action evacuation or lock down procedures. Contact '000'
3. If required provide essential first aid. Contact '000'
4. If required and only when safe to do so isolate area of incident
5. Report incident to Manager International Education or delegate.
6. As soon as possible upon being advised, the Manager International Education or delegate will liaise with relevant persons and staff to:
 - a. establish a Critical Incident Team.
 - b. ensure a Media Coordinator and Critical Incident Coordinator are identified (this may be one person with two functions).
 - c. ensure the Critical Incident Policy is implemented.
 - d. ensure a plan is established and communicated to all relevant staff.
 - e. ensure ongoing strategies for managing the incident and response.
 - f. ensure agencies, support organisations and other individuals are involved in responding to the incident, including liaison with police, doctors, hospital staff and other relevant professionals.
 - g. when relevant communicate with all students and stakeholders of any disruption or change to daily operations

- h. legal assistance is provided if required.
 - i. family members (identified emergency contact person, next of kin, authorised guardian, parents, siblings) are advised of the incident and advised about what is being done in response, who is involved, and what support is available to them.
 - j. appropriate and adequate records are kept.
7. If required, assist family members to arrange travel to Australia, or return of the student to his or her home country.
 8. The Critical Incident Team will enlist assistance from ABILITY English staff and outside agencies as required.
 9. Student Support Services and Wellbeing Team are available as required
 10. If required appropriate reports made to ASQA

3.1. First Response Checklist

Issues to be considered:

- Is evacuation or lock down required, and if yes, was it managed appropriately?
- Is first aid or medical assistance provided in a timely manner?
- Is a person appointed to act as Critical Incident Coordinator and/or Media Coordinator?
- Is contact with next of kin/significant others made in a timely and appropriate manner?
- Are there adequate arrangements for informing staff and students?
- Are there guidelines to staff about what information to give students?
- Is there an appropriate written bulletin to staff, if the matter is complex?
- Is there appropriate and sufficient briefing for staff and students?
- Is there a staff member delegated to deal with telephone/counter enquiries if required?
- Is media and publicity being managed appropriately?
- Is there adequate identification of those students and staff members most closely involved and therefore most at risk?
- Has relevant and culturally appropriate counselling been implemented?
- Is there a plan for ongoing feedback and regular meetings as a post-critical incident activity?

3.2. Other Considerations

- availability of mobile phones
- hiring independent interpreters
- refund of student's fees to pay repatriation or associated expenses
- 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 assessment or exams)
- arrangements for further debriefing sessions for groups/individuals as required
- fees issue to be resolved if student cannot continue with their studies
- legal issues: supporting and referring students to access legal assistance if required.
- arrangements for further debriefing sessions for groups/individuals as required
- follow up condolences
- financial assistance for families of affected person(s) if residing in Australia
- organising students/staff for hospital visits
- sensitivity to anniversaries, inquests and legal proceedings.

3.3. Stress Management Checklist

- 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 - 6 weeks later - (individual or group basis)
- ongoing counselling as required (staff and their families can access ABILITY English's Employee Assistance Program)
- recovery time for staff involved and the Coordinating Team members.

3.4. Student Records Checklist

ABILITY English will ensure the following as a minimum is kept and up-to-date within the students' records, and can be made available in hard copy if required:

- colour photograph (from ID CARD)
- copy of passport, including number, photo page and visa page
- student's address and telephone number

- student's religion if provided
- emergency contact telephone, with next of kin details, agent or sponsor (if applicable)
- any other identification details - student ID, course details, known medical conditions, allergy information etc.

3.5. Staff Awareness Training

The following considerations should be included in critical incidents staff awareness training:

- attitude and perceptions – how staff present and manage themselves can be critical in effective management of the incident.
- effective communication skills are essential to effective management of a critical incident - Listening to what is said and what is not said is a key component of this.
- making use of networks, community groups, cultural groups and religious groups should be considered to provide support to students, family, friends and staff – persons injured or directly affected by the critical incident as well as those providing support to them may benefit from this broader support circle.
- cultural intelligence – appropriate responses by staff will reduce escalation or complication of the situation.
- available services and support, and how to access them.
- self-protection is important – you can not help others effectively if you are overly stressed or become injured.
- staff will not be singled out to take sole responsibility for management of the incident.

3.6. Timelines and records

All critical incident written records and related documentation will be kept in archive for no less than 2 years after the student/students ceases enrolment.

3.7. Police Involvement

Where critical incidents are cases of sudden unexpected death, injury, assault or disaster, the police and others must be contacted and will investigate the incident.

Police actions include:

- recording a report of the incident
- where appropriate investigating the incident

- reporting death to the Coroner
- notifying next of kin in cases of death
- obtaining official identification of the deceased (this must be done by someone who has known the deceased for some time)
- conducting investigations on behalf of the Coroner - for example, interviewing witnesses and others who may have been involved, collecting clothing and other items for use in evidence, delivering specimens for analysis.

4. RELATED POLICIES AND PROCEDURES

EDN-015-I-POL Notification of Material Change Policy and Procedure

EDN-006-I-POL Student Support Services Policy

EDN-026-I-POL Student Records and Archiving Policy and Procedure

5. IMPLEMENTATION

EDN-019-I-POL Critical Incidents Policy and Procedure is made available via the on the ABILITY English Intranet internally.

6. RESPONSIBILITIES

The Manager International Education and the Compliance Team will review this policy annually, or in case of legislative changes requiring amendments.

7. ATTACHMENTS

N/A

8. PROCESS MAP

N/A