

Critical Incident Procedure

Purpose

1. This Policy gives effect to the Critical Incident Policy by outlining the action to be taken and the follow up required when any member of the Global Higher Education (GHE) community is involved in a critical incident.

Scope

2. This Policy applies to the entire GHE community including students, academic and professional staff, members of governance boards and committees, mentors, visitors on campus and members of the public where they may also be affected by a critical incident occurring on or near a GHE campus.
3. Critical incidents are as defined in the Critical Incident Policy.

Definitions

4. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

Suite documents

5. This Procedure is linked to the Critical Incident Policy.

Procedure

Emergency and critical incident management cycle

6. GHE adheres to the Federal Emergency Management Agency – USA (FEMA) model for emergency and critical incident management which distinguishes between four distinct management phases as outlined in Figure 1 and defined in Table 1.

Figure 1: FEMA Model



Table 1: FEMA Model Defined

Phase	Explanation	Timeframe
Prevention	Actions undertaken to prevent critical incidents, reduce the chance of a critical incident happening, or reduce the damaging effects of unavoidable critical incidents	Ongoing
Preparedness	Actions, plans and arrangements, training and education to ensure GHE staff, students, governance board members, contractors, and volunteers are prepared to respond to a critical incident.	Ongoing
Response	The assistance and intervention during or immediately after a critical incident.	Measured in hours, days or weeks
Recovery	Actions taken to facilitate a return to a normal or an even safer situation following a critical incident.	Measured in months and/or years

Prevention

7. In addition to adherence to the **Risk Management Policy** and related procedures, the Operations Director is responsible for ensuring that the following prevention activities are implemented:
 - a) student emotional and mental health are actively supported via the 3C Wellbeing and Support Model (see **Student Wellbeing, Orientation and Support Policy**);
 - b) security staff are stationed at the main entrance while the campus is open to the students and the public;
 - c) all building safety checks, and certification are completed on schedule;
 - d) occupational health and safety checks are completed on schedule;
 - e) IT security arrangements are stringently enforced;
 - f) records management and privacy requirements are stringently enforced.

Preparedness

8. In addition to adherence to the **Risk Management Policy** and related procedures the Operations Director is responsible for ensuring that the following prevention activities are implemented:
 - duress alarms are situated in all key gathering areas;
 - a) emergency evacuation information is placed prominently in all public areas, including classrooms and staff rooms. This information is designed to be understandable, regardless of English language ability;
 - b) at least one designated first aid officer is available during standard opening hours;
 - c) a trained emergency/fire warden is in place;
 - d) an Occupational Health and Safety Officer is generally available during standard opening hours;
 - e) frontline staff have access to information and training to assist them to deal with potential bomb threats, suspicious packages, tampered mail, and questionable, disruptive and threatening behaviours;
 - f) all staff and students have access to information and training on campus safety and security;
 - g) emergency telephone contact numbers and media contacts are kept up to date;
 - h) critical incident response procedures are tested on an annual basis through the implementation of drills and mock scenarios.

Response

9. The first respondent (hereafter Designated Staff) is the GHE staff member who is either a witness to, or first to be informed about an actual or potential critical incident across all categories.

Category One: critical incidents involving an immediate potential or actual or harm to a person or people

Category	Examples
1	Fire on campus or in adjacent building Explosion Negative building evaluation Biological or chemical hazard Construction accident Death of staff or student Medical emergency Bomb threat Suspicious package Active shooter, intrusion or hold-up Sexual or other assault Siege or terrorism Child protection matter Kidnapping Self-harm, actual or attempted Violent behaviour

10. The Designated Staff is to assess the situation and consider any apparent risks to their own safety before taking further action.
11. Where the Designated Staff considers a critical incident to be apparent or likely, s/he must alert (in order of priority):
- external emergency services;
- a) internal security services;
 - b) the Operations Director or the most senior staff member available.
12. Notification 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.
13. Provided there is no threat to personal safety in doing so, the Designated Staff is to take steps to minimise further damage or injury.
14. If people are at risk, they will be removed from the area and/or assistance will be rendered as necessary. The incident area will be sealed off if required.
15. The Designated Staff may need to assume temporary control of a critical incident site and assign duties to available persons (such as calling emergency services, alerting other staff, assisting with first aid, crowd control etc.).
16. The Operations Director or the most senior staff member available is to assume responsibility for re-assessing the incident and forming a Critical Response Team (CRT) if deemed necessary.
17. The CRT will convene as soon as possible to review the situation, set priorities, allocate tasks/responsibilities and coordinate an immediate response including communications (to staff, students, families of those involved, helpers, and the media).

18. Where GHE has assumed management of the critical incident, the CRT will consult with and/or take instruction from senior management, the Board of Directors and/or external experts as necessary.
19. The Chief Executive Officer will notify TEQSA if required under the regulator’s Material Change Notification Policy, including where the incident represents a risk to the GHE’s ongoing compliance under the *Tertiary Education and Quality Standards Agency Act 2011* as a registered higher education provider.

Figure 2: Critical Response Team

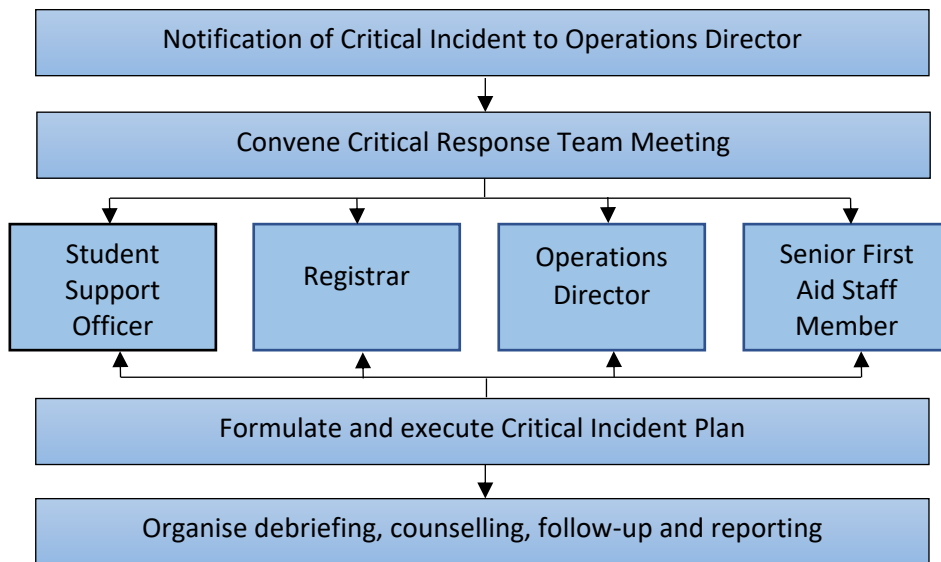


Table 2 : Category One Event - Tasks and responsibilities

Position	Task
Director Operations or most senior staff member present:	<ul style="list-style-type: none"> • Head the Critical Response Team • Establish a central information point to provide up-to-the-minute, accurate information to staff, students, families of those involved, helpers, and the media • Liaise with emergency or other specialist (including sexual assault) services as required • Inform family/next of kin in case of death or serious injury/un-wellness if Police not actioning • Liaise with Diplomatic Post/Embassy/Consulate • Liaise with relevant civil/religious authorities and coordinate memorial service arrangements if appropriate • Prepare a written record of the event and all follow-up actions for the final report • Organise insurance matters, OSHC/ambulance cover • In the event of a student death, refund student fees as appropriate • Organise formal counselling and any stress management interventions required for staff • Review legal issues including advising family of process/access to assistance if needed • Prepare letter of condolence to family/next of kin • Organise appropriate certified interpreters / translators (not students) • Liaise with Doctors and Hospital Staff/Coroner/Funeral Director • Obtain authorisation from next of kin for disposal of personal effects and affairs (household and academic)
Chief Executive Officer	<ul style="list-style-type: none"> • Notify TEQSA of a Material Change if appropriate
Academic Director or most senior academic staff member:	<ul style="list-style-type: none"> • Communicate with students / GHE community • Liaise with academic staff
Registrar	<ul style="list-style-type: none"> • Deputise for the Operations Director where required • Ensure appropriate handling of student data by administrative staff • Liaise with Department of Home Affairs (DoHA) regarding Student Visas where required • Assist with media liaison • Act as agent liaison

Category Two: Critical incidents involving a critical incident involving probable harm to a person or people

Category	Examples
2	Missing students/staff Anthrax scare Asbestos

20. The Designated Staff is to assess the situation and consider any apparent risks to their own safety before taking further action.
21. Where the Designated Staff considers a critical incident to be apparent or likely, s/he must alert (in order of priority):
 - a) external emergency services;
 - b) internal security services;
 - c) the Operations Director or the most senior staff member available.
22. Notification 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.
23. Provided there is no threat to personal safety in doing so, the Designated Staff is to take steps to minimise further damage or injury.
24. If people are at risk, they will be removed from the area and/or assistance will be rendered as necessary. The incident area will be sealed off if required.
25. The Designated Staff may need to assume temporary control of a critical incident site and assign duties to available persons (such as calling emergency services, alerting other staff, assisting with first aid, crowd control etc.).
26. The Operations Director or the most senior staff member available is to assume responsibility for re-assessing the incident and will lead the inquiry and response, liaising with other key staff as necessary (dependent on the nature of the critical incident).

Table 3: Category Two Event - Tasks and responsibilities

Position	Task
Director Operations or most senior staff member present:	<ul style="list-style-type: none"> Establish a central information point to provide up-to-the-minute, accurate information to staff, students, families of those involved, helpers, and the media Liase with Emergency Service Inform family/next of kin in case of missing student Review legal issues including advising family of process/access to assistance if needed Liase with Diplomatic Post/Embassy/Consulate Liase with relevant civil/religious authorities and coordinate memorial service arrangements if appropriate Prepare a written record of the event and all follow-up actions for the final report Organise insurance matters, OSHC/ambulance cover
Chief Executive Officer	<ul style="list-style-type: none"> Notify TEQSA of a Material Change if appropriate
Academic Director or most senior academic staff member:	<ul style="list-style-type: none"> Communicate with students/staff/community
Registrar	<ul style="list-style-type: none"> Deputise for the Operations Director where required Ensure appropriate handling of student data by administrative staff Liase with Department of Home Affairs (DoHA) regarding Student Visas where required Assist with media liaison Act as agent liaison

Category Three: Potential harm to GHE's reputation

Category	Examples
3	Staff/governance member accused of or arrested in relation to a serious crime Serious conflict of interest Industrial action Major case or systemic plagiarism Theft, fraud, corruption, mismanagement, malice Third party negligence including in work-based learning arrangements

27. Designated Staff refer all Category Three incidents directly to the Chief Executive Officer (CEO).
28. Notification 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.
29. The CEO is to assume responsibility for assessing the incident and will lead the inquiry and response liaising with other key staff (dependent on the nature of the critical incident).
30. The Operations Director in conjunction with the CEO will lead the media response.

Category Four: Threat to facilities

Category	Examples
4	Critical equipment failure Cyber-attack or data / records loss Gas leak Failure of essential services/utilities IT equipment or software failure Power failure Sabotage of building Security access Structural or water damage

31. Critical incidents involving a threat to facilities that impact on the business continuity of the GHE entity are managed in accordance with **Business Continuity Policy** and its related procedures.
32. Critical incidents involving a threat to facilities that have an immediate impact on staff, students, governance board members, contractors, volunteers and visitors are reported by the first respondent (Designated Staff) to the Operations Director or the most senior staff member present.
33. If the critical incident requires the evacuation of the campus the emergency evacuation alarm is sounded and the emergency/fire warden on each floor:
 - a) requests the immediate cessation of all activity;
 - b) assists and seeks assistance from able-bodied persons to help any person in immediate danger, but only if safe to do so;
 - c) if practical, and only if safe to do so, secures any activity or process that may become hazardous or suffer damage if left unattended as a consequence of evacuation;
 - d) assists with the general evacuation;
 - e) manages the nominated evacuation assembly;
 - f) follows the instructions of relevant emergency services personnel.

Table 4: Category Four Event - Tasks and responsibilities

Position	Task
Operations Director or most senior staff member present:	<ul style="list-style-type: none"> • Head a CRT if required (see Category One response for detail) • Establish a central information point to provide up-to-the-minute, accurate information to staff, students, families of those involved, helpers, and the media • Liaise with Emergency Services • Take overall responsibility for management of the evacuation point • Instigate remedial actions • Prepare a written record of the event and all follow-up actions for the final report • Organises insurance matters
Chief Executive Officer	<ul style="list-style-type: none"> • Notify TEQSA of a Material Change if appropriate
Academic Director or most senior academic staff member:	<ul style="list-style-type: none"> • Communicate with students/staff/community
Registrar	<ul style="list-style-type: none"> • Deputise for the Operations Director where required • Assist with media liaison • Act as agent liaison

Category Five: External threat

Category	Examples
5	Pandemic diseases Natural disasters Political upheaval Public disorder Off-campus incident

34. Should a Category Five incident disrupt the operations of GHE or threaten the safety of the GHE community, the first respondent (Designated Staff) must alert (in order of priority):
 - a) external emergency services;
 - b) internal security services;
 - c) the Operations Director or the most senior staff member available.
35. Notification 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.
36. The campus should be secured as a matter of priority.
37. The Operations Director or the most senior staff member available will act as the conduit between GHE and emergency service personnel and take whatever steps are necessary to maintain the personal safety of everyone involved.
38. Where GHE students or staff are involved in a Category Five incident off campus in Australia the Operations Director will act as the conduit between GHE and emergency service personnel, and where appropriate the family or next of kin of the person(s) affected.
39. Where GHE students or staff are involved in a Category Five incident off campus internationally, GHE's travel insurance arrangements will be activated.

Recovery

40. As soon as possible following a critical incident, a meeting of the CRT or senior management (dependent on the category of the incident) will be called to brief members on the incident, responses and outcomes.
41. Important follow-up procedures must be implemented in the areas of counselling, information dissemination, and debriefing. The CRT or senior management will:
disseminate information to staff, students, and all those affected by the incident and to the media;
 - a) monitor the need for counselling and maintain contact with those who may need ongoing support, often at times and in locations outside of the normal routine of the GHE entity;
 - b) consider the appropriateness of personal contact with victims and those affected by the incident outside of normal hours;
 - c) notify Student Support and, where relevant, course coordinators for students who are likely to be affected by the traumatic situation to ensure that proper support is given, and appropriate contact is made;
 - d) where international students are involved, contact overseas authorities such as embassies and delegations;
 - e) conduct debriefing sessions for everyone directly involved in the incident including, if necessary, the wider GHE community.
42. Following the incident, the CRT or senior management will evaluate the deployment of the relevant procedures and the overall response to the incident.

43. Procedures adopted in a particular incident will form the basis of improved responses to critical incidents, with staff, students and other people directly impacted by the incident encouraged to provide their feedback to assist in the development process.
44. Staff will undertake training relevant to the handling of a critical incident and post-trauma stress management.

Reporting

45. The Operations Director will ensure that:
 - a) reports from individual critical incidents, including remedial actions, are submitted to the Audit and Risk Committee and maintained in a central register for at least two years after any student involved in the incident ceases to be an enrolled student or any staff member ceases to be employed;
 - b) reports, including analysis, on the prevention, preparedness and management of critical incidents are submitted to the Audit and Risk Committee and Board of Directors on an annual basis.

Roles and responsibilities

46. The Board of Directors is responsible for the overarching governance of this Procedure.
47. The Audit and Risk Committee is responsible for the overarching management of this Procedure.
48. The Chief Executive Officer is responsible for:
 - a) notifying TEQSA of a Material Change that may arise from a critical incident;
 - b) assessing and leading the critical incident response in relation to Category Three incidents.
49. The Operations Director is responsible for:
 - a) implementing prevention and preparedness activities;
 - b) ensuring all staff are aware of the membership, role and autonomy of the Critical Response Team;
 - c) all critical incident management operations and reporting, including convening the Critical Response Team (CRT);
 - d) acting as the media representative in relation to responses to Category Three incidents;
 - e) ensuring that reports on critical incidents prevention, preparedness and management are prepared for the Audit and Risk Committee and the Board of Directors on an annual basis;
 - f) the maintenance of all records arising from this Procedure.
50. The Registrar will deputise for the Operations Director in the response to any critical incidents where required.
51. The Academic Director is responsible for communications concerning critical incidents with students, family and academic staff.
52. The Manager, Quality and Compliance is responsible for:
 - a) ensuring compliance with this Procedure;
 - b) ensuring that staff are adequately notified of the existence of this Policy and the related procedures;
 - c) benchmarking GHE policy and standards with those adopted elsewhere in the higher education sector;
 - d) the monitoring of information available from the review of records relating to the implementation of this Procedure.
53. All staff are responsible for becoming familiar with and complying with this Procedure.

Associated information

Related Internal Documents	<p>Critical Incident Policy Business Continuity Policy Campus and Asset Management Policy Human Resources Framework Records and Data Management Policy Risk Management Policy Strategic Asset Management Plan Strategic Plan Student Complaints, Grievances and Appeals Policy Student Sexual Assault and Sexual Harassment Policy Teaching and Learning Plan Work-Integrated Learning Placement Policy Glossary of Terms</p>
Related Legislation, Standards and Codes	<p><i>Tertiary Education and Quality Standards Agency Act 2011</i> <i>Higher Education Standards Framework (Threshold Standards) 2021</i> <i>TEQSA Guidance Notes: Staffing, Learning Resources and Educational Support, Version 1.3, Wellbeing and Safety, Version 1.2</i> <i>TEQSA: Material Change Notification Policy, Version 3.5</i> <i>Education Services for Overseas Students Act 2000</i> <i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i> <i>Work Health and Safety Act 2012 (SA)</i></p>
Date Approved	1 May 2020
Date of Effect	1 May 2020
Date of Review	June 2026
Approval Authority	Board of Directors
Policy Custodian	Chief Executive Officer
PinPoint DocID	2687

Change history

Version Control	Version 1.1	
Change Summary	12-Aug20	V1.0 Draft approved by the Board of Directors (BoD) 1-May-20 with minor amendments
	8-Jul-23	V1.1 administrative updates following TEQSA registration

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