



Critical Incident Policy

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Policy Code	GP015		
Contacts	policy@top.edu.au		
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2019.05	Principal	8 May 2019	8 May 2019

1. Introduction

The guiding principle of this policy is the *Higher Education Standards Framework (Threshold Standards) 2015* (Cth) (**Threshold Standards**). The Threshold Standards contain the minimum acceptable requirements for the provision of higher education in Australia by higher education providers registered under the TEQSA Act 2011.

Of particular relevance to this policy are a number of sections of the Threshold Standards, which are addressed in this policy, including:

- Section 2.3(5): “There is a critical-incident policy together with readily accessible procedures that cover the immediate actions to be taken in the event of a critical incident and any follow up required”;
- Section 7.3(3)(c) regarding Information Management: “Information systems and records are maintained, securely and confidentially as necessary to document and record responses to...critical incidents”; and
- Section 6.2(1)(j) regarding Corporate Monitoring and Accountability: “The provider is able to demonstrate, and the corporate governing body assures itself, that the provider is operating effectively and sustainably, including the occurrence and nature of...critical incidents are monitored and action is taken to address underlying cause”.

2. Purpose

This section establishes the management plan for critical incidents as they may occur while students are undertaking their study at TOP Education Institute (TOP). It applies to all qualifications and programs run by TOP.

The purpose of the Critical Incident section is to provide the rationale and rules for managing critical incidents that may occur while students are undertaking TOP courses or subjects. This policy will assist plan for, respond to and manage, in a timely and coordinated manner, student critical incidents to ensure they are:

- responded to, or resolved, in the best possible way for the student(s), their families, and for TOP;
- documented appropriately;

- reported to relevant officers within TOP, relevant international and Australian government agencies and other stakeholders (as required);
- communicated to the family in an appropriate way if necessary; and
- managed in a manner to ensure that TOP's reputation, domestically and internationally, is not damaged as a result of the incident.

3. Scope

This policy and corresponding procedures applies to:

- Any category of individual or groups of enrolled students (e.g. non-award, undergraduate, postgraduate and research, domestic and international) from TOP where the student critical incident occurs on campus;
- Any category of individual or groups of enrolled students from TOP when the student critical incident occurs during an approved TOP related activity regardless of onshore or offshore. TOP related activities include field trips, placements, internships, study tours etc.; and
- All international student critical incidents regardless of whether at the time of the incident, the student is engaged in an approved or non-approved TOP related activity and on or off campus, or engaged in an approved TOP related activity off-shore.

4. What is a critical incident?

A critical incident is one that is so unusual or so distressing that it produces a high level of emotional reaction that may be immediate or delayed. It is important to note that what is a critical incident for one person may not be a critical incident for another. It depends on one's perception of vulnerability and amount of control over a situation.

For the purpose of this policy, the following events are defined as critical incidents:

- Serious injury or death.
- Sexual assault or abuse.
- Violence or threats of violence.
- Robbery with threat of violence.
- Sudden or unexpected death or suicide of a work colleague, classmate or teacher.
- Natural disasters or other major disaster in the community.
- the destruction of part, or the whole of TOP.
- Major vandalism.
- Bomb threats or acts of terrorism.
- High publicity violent crimes.
- Attempted suicide.
- Missing student.
- Any incident that is charged with extreme emotion.
- Other serious event.

5. Management plan

In the event of a critical incident, TOP recognises that appropriate infrastructure must be in place to ensure the provision of all necessary support services. This document outlines TOP's policy, support mechanisms and procedures for managing a critical incident. This policy will ensure:

- An effective approach in responding to critical incidents as they occur;
- Appropriate support and counselling services available to those affected;
- Appropriate training and information resources provided to staff.

The following steps outline the process to manage a critical incident and apply to TOP staff including sessional staff members, who may be present when the incident occurs or who may be the first point of contact for the student.

5.1. Critical Phase

The critical phase is that time immediately after the incident has occurred, or the point in time when the student first contacts TOP. All staff should ensure that they consider the following points in dealing with the incident:

- that the student is safe and is receiving adequate medical supervision in a safe environment;
- that other students are safe;
- If appropriate, ensure that emergency services have been notified.
- that the incident is reported to the relevant TOP Manager (e.g. Principal);
- relevant authorities are contacted as appropriate (e.g. police, ambulance);
- Ascertain the facts:
 - Casualties – Are there any?
 - How critical are they?
 - Damage to property and equipment (both TOP's and private)
 - Impact on academic services
 - IT systems – Are they available?
 - Telephones – Do they work?
 - Media – Are external media on site or seeking a response?
- if necessary, an interpreter is called to stand by for assistance;
- Secure area affected - minimise safety exposures and preserve where possible anything which may provide information for later use by emergency services or in follow-up
- Contain the incident
- Formulate response strategies
- Contact with next of kin/significant others - consider the most appropriate manner of contact?
- Arrangements for informing staff and students.
- Guidelines to staff about what information to give students.
- Briefing staff and delegating a staff member to deal with telephone/counter inquiries.
- Managing media/publicity
- Formulate recovery strategies and position TOP to return to normal operations
- Advise Principal of progress

- Confirm access to emergency funds if necessary.
- Consider regular debriefings throughout the management of the incident
- Once the incident is contained, evaluate the management process for the purpose of continuous improvement
- that activities are resumed if appropriate once satisfied that the student is not in danger and receiving medical supervision;
- that at the earliest possible time the student is interviewed to ascertain what happened and if there are any ongoing problems;
- that other students are supported and counselling is arranged if required;
- that any other immediate needs, i.e. need for additional support, to make a police report, report stolen goods are attended to; and

5.2. Ongoing and follow up response

Once the incident has been managed and necessary contact has been made with all relevant personnel, it is important that follow up of the student is undertaken by a nominated staff member. It may also be required to contact the students family. This may include the following:

- Keeping in contact with the student and relevant others which may include monitoring the situation with a daily call.
- Checking that the student is receiving ongoing help with medical conditions and counselling.
- Passing on findings to the appropriate manager and other relevant people.
- Arrangements for visits to/from family
- Liaison with police, doctors, hospital staff
- Death notices
- Making arrangements for hospital/funeral/memorial service/repatriation
- Obtaining a death certificate
- Assisting with personal items and affairs including insurance issues, Overseas Student Health Cover (OSHC) coverage, ambulance cover
- Fees issue to be resolved if student cannot continue with their studies
- Legal issues: helping students get access to legal assistance if required.
- Arrangements for further debriefing sessions for groups/individuals as required
- Follow up condolence or other letters to family
- Financial assistance for families of affected person(s) if residing in Australia.

When an international student is involved in a critical incident, the College may be required to further assist the student's family. This may include:

- Hiring interpreters
- Refund of student's fees to pay repatriation or associated expenses
- Assisting with visa issues
- Liaison with the Department of Home Affairs if studies will be interrupted
- Contact any homestay or accommodation provider (if known)

5.3. Investigation Process

To ensure that the critical incident is accurately recorded and managed, the nominated TOP Manager should ensure that any interview that is conducted:

- Collects facts about the incident (e.g. injuries to person, any witnesses, information from the scene). This may be in written form or through the use of media such as photographs as appropriate.
- Examines any work procedure or safe operating procedure or training that may have impacted the incident.
- Determines the cause of the accident/incident paying attention to contributing factors, environmental factors, mechanical failure, and systems failure.
- Reviews work procedures, training, and/or safe operating procedures.
- Documents recommendations.
- Communicates results of investigation to employees and relevant others.

5.4. Reporting

It is important that necessary staff are informed of the outcomes of the investigation and that any written report is provided to the appropriate manager.

- Verbal reports, in the first instance, are to be made to the relevant TOP Manager in accordance with **Appendix 1**.
- Written reports, approved by the student for accuracy, are to be put on the student's file and on TOP's Critical Incident file.
- If there is a death, then the procedure set out in **Appendix 2** should be followed.
- A written report is to be sent to the parents of the student and other relevant authorities with permission.
- The Checklist in **Appendix 3** is to be completed after any critical incident. This should also be filed with the report in TOP's Critical Incident file.
- Suggestions and recommendations are to be made to prevent similar occurrences.
- There are a number of emergency services, national and/or State-based set out in **Appendix 4**.

5.5. International Students

If the decedent was an enrolled international student there are additional reporting requirements under the Education Services for Overseas Students Act 2000 (*ESOS Act*).

- The Students Services Manager and the Admissions Manager must be advised of any incident.
- As soon as practical after any death, the Admissions Manager must advise a Department of Immigration and Border Protection Education Provider Liaison Officer of the circumstances of any incident.
- TOP is required to notify the Department of Borders Protection as soon as practical after the

incident and in the case of an international student's death or other absence affecting the student's attendance, the incident will need to be reported via the Provider Registration and International Student Management System (PRISMS). All aspects of the incident and its management will be recorded on the student files. Any action taken in regard to a critical incident will be recorded to include outcomes or evidence if the incident is referred to another person or agency

- It is especially important to contact the State Immigration office, prior to reporting on PRISMS, so the Liaison Officer may prevent a letter being sent to the student's most recent recorded address thus minimising the possibility of further distress for the student's family.
- Using PRISMS to report the student's death, the Student Admissions Officer will enter the student course variation reason/code as below against the student's electronic confirmation of enrolment (eCoE)
- Reason for Student Course Variation --- Termination of Student studies prior to completing the course
- Termination Reason --- Provider decision to cease student enrolment
- Provider decision to cease student enrolment reasons --- Student has died (include full details in the comment field as per death certificate/funeral notice and state that DIAC has been notified by email and provided supporting documentation)

The Admissions Manager or Student Services Manager must advise: the Head of School, the IT Manager, the Principal and the Senior Manager HR and Administration. The following details should be presented:

- student name;
- student number
- program, location and the time the student attended the University
- date of birth
- cause of death (if known)
- name of next of kin (if known)
- contact address for next of kin (if known)

The Head(s) of School will check the student's program progression in case the student may be eligible for a Posthumous Award under TOP's Posthumous Awards – Policy. The Head(s) of School will provide the information relevant to the Provost and who will determine whether an application for a Posthumous Award should be lodged through the Faculty Board for consideration by Academic Board.

The Student Services Manager will negotiate arrangements with the next of kin and/or sponsor for handling the deceased person's body and personal affects. A memorial service will be organised for fellow students, staff and family.

6. Media Management

A media management process will be included in the management plan to ensure the most positive and supportive response from the media. Media Management is directed solely by the Principal of TOP, who will in most circumstances direct TOP's publicity consultant to take charge of any media

materials. Under no circumstances are other staff members to engage with members of the media.

7. Critical Incident Staff Training

It is important for all TOP staff to be aware of the policy and procedures and how to respond in the events of critical incidents. This would include:

- 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 to 6 weeks later - (individual or group basis)
- Ongoing refresher training as required
- Recovery time for staff involved

8. Critical Incident Recovery Timeline

In order to successfully manage a critical incident, the College will always take appropriate action and provide support during and after a critical incident.

The recovery timeline following a critical incident will vary depending on the circumstances.

- *Immediately (within 24 hours)*
 - Gather the facts;
 - Ensure safety and welfare of staff and students and arrange for first-aid if necessary;
 - Where possible notify the time and place of the debriefing to all relevant persons;
 - Manage the media;
 - Set up a recovery room;
 - Keep staff, students and parents/family informed.
- *Within 48-72 hours*
 - Arrange counselling as needed;
 - Provide opportunities for staff and students to talk about the incident;
 - Provide support to staff and helpers;
 - Debrief all relevant persons;
 - Restore normal functioning as soon as possible;
 - Keep parents/family informed.
- *Within the first month*
 - Arrange a memorial service, if appropriate;
 - Encourage parents/family to participate in meeting to discuss students' welfare;
 - Identify behavioural changes and the possibility of post-traumatic stress disorder and refer to health professionals;
 - Monitor progress of hospitalised staff or students;
 - Monitor mental and physical health of all helpers.
- *In the longer term*
 - Monitor staff and students for signs of delayed stress and the onset of post-traumatic stress disorder - refer for specialised treatment;

- Provide support if needed;
- *In the long term*
 - Plan for and be sensitive to anniversaries, inquests and legal proceedings
 - Access specialist support if needed.

9. Version Control

Historical Version	Approved by	Approval Date
2014.06	Principal	30 June 2014
2019.05	Principal	8 May 2019

Appendix 1 TOP Critical Incident Report (To be completed after all critical incidents).

Date:

Action Officer:

Position:

Brief summary of incident: include where, when, who, and why as appropriate. Further information/documentation may be attached.

Immediate action taken:

Further action required:

Persons or staff notified and time & date:

Signature:

Date:

Follow up: (a) Original to Critical Incident Record File; (b) Copy to student files (Student Services); and (c) Copy to relevant staff file (HR Manager)

Appendix 2 – Procedures in case of student death

In the case that an incident results in the death of a student, the relevant TOP Manager should form a coordinating committee that is comprised of relevant employees including the Students Services Manager and student advisor representatives. The responsibilities of this committee are to:

- Assess risk 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;
 - The person assigned to deal with the media;
 - Teaching/academic and other relevant staff;
 - Student associations;
 - Chaplain or priest;
 - Department of Immigration and Border Protection, Consulate, Sponsor, 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 TOP.
- 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.
- Review critical incident procedure.

For overseas students the responsibilities of the committee 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.

Appendix 3 – Checklist for follow up, review and evaluation

How well were the following actions undertaken by the Critical Incident Coordinating Group? 1

= poor; 5 = excellent.

Please add comments to clarify your choice if required

Questions	1	2	3	4	5
Decision maker clear					
Follow up clear					
Arrangements for visits to/from family					
Notification of and liaison with Sponsor/ Agent					
Liaison with Police, Doctors, Hospital Staff					
Liaison with Independent Interpreters					
Making arrangements for hospital/funeral/memorial service/repatriation					
Death Notices					
Funeral/ Memorial Service Arrangements					
Refund of student's fee to pay repatriation or associated expenses					
Copy of Death Certificate					
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 exams)					
Liaison with Academic Staff					
Arrangements for further debriefing session for groups/ individuals					
Liaison with the Department of Home Affairs if studies will be interrupted					
Fees issue to be resolved for students unable to continue with their studies					
Legal issues: helping students get access to legal assistance if required					
Follow up condolence or other letters to Family					
Financial Assistance for families of affected person(s) if residing in Australia					
Organising students/ staff for hospital visits					

Appendix 4

The following details are for additional emergency services, national and/or State-based

ALCOHOL & DRUG INFORMATION

24 Hour Telephone Service
Information and Referral (02) 9361 8000
Outside Sydney Metro Area 1800 422 599
<http://yourroom.com.au/faq/>

AUSTRALIAN FUNERAL DIRECTORS ASSOCIATION

1300 888 188 www.afda.org.au

AUSTRALIAN SEARCH AND RESCUE

Australian Maritime Safety Authority (02) 8918 1300
Aviation Rescue 1800 815 257
Maritime Rescue 1800 641 792

CHILD PROTECTION

DOCS Helpline 132 111

CENTRELINK

Youth and student services 132 490
For information in languages other than English 131 202

CONSULATES IN AUSTRALIA

or a full index of consulates in Australia
<http://protocol.dfat.gov.au/Consulate/list.rails>

CORONER'S COURT

44 – 46 Parramatta Rd, Glebe (NSW State Coroners Court)
(02) 8584 7777
<http://www.coroners.justice.nsw.gov.au/>

EPILEPSY SPECIALIST COUNSELLING SERVICES

45 Hunter St Parramatta 2150 (02) 9893 7799

EMERGENCY ANIMAL DISEASE WATCH HOTLINE

1800 675 888

FAMILY COUNSELLING

Domestic Violence Service (24 hours)
FREECALL 1800 656 463

FINANCIAL COUNSELLING (CreditLine)

53 Regent St Sydney 2000
(02) 9951 5544

GRIEF COUNSELLING

Australian Counselling Association 1300 784 333

HOMICIDE VICTIM SUPPORT GROUP NSW

Lvl 15/ 189 Kent St Sydney 2000

(02) 8274 8900

INTERPRETING SERVICES

Community Relations Commission for a Multicultural NSW
24 Hour Interpreting Service
1300 651 500

LEGAL SERVICES

Legal Aid Commission of NSW (NSW Government)
(02) 9219 5000
Under 18's Hotline FREECALL1800 101 810

LIFELINE 24 HOURS

24 hr Counselling 131 114
LIFELINE Harbour to Hawkesbury Counselling 131 114
Lifeline is a 24-hour telephone counselling line for urgent and immediate needs and also has suicide crisis line.

MENTAL HEALTH ADVOCACY SERVICE

(02) 9745 4277

POISONS INFORMATION CENTRE

131 126

ROYAL PRINCE ALFRED HOSPITAL

Missenden Road, Camperdown NSW 2050
General phone: +61 2 9515 6111
Alcohol and Drug Information Service Sydney (02) 9361 8000 or 1800 422 599.

SALVO CARE LINE CRISIS CENTRE (24 hrs)

Salvo Care Line (02) 9331 6000
Salvo Suicide Prevention/Crisis Line (02) 9331 2000 Salvo
Youth Line (02) 9360 3000

SEXUAL ASSAULT 24 HOUR CRISIS CENTRE

Rape Crisis Centre 24 Hours Counselling Line
FREECALL1800 424 017
info@nswrapecrisis.com.au
www.nswrapecrisis.com.au

ST VINCENT'S PUBLIC HOSPITAL

Victoria St Darlinghurst 2010 (02) 8382 1111
Alcohol & Other Drug Information (02) 9361 8010
Mental Health Service (02) 8382 1800
Anxiety Disorders Clinic (02) 8382 1730

SYDNEY HOSPITAL

Macquarie St Sydney 2000 (02) 9382 7111
Sexual Health Centre(02) 9382 7440

SUICIDE HELPLINE

Kidsnet-Helpline - Westmead Children's Hospital (02) 9845 2432
Lifeforce Suicide Prevention Program - Educational Program FREECALL 1800 100 024
www.wesleylifeforce.org

TRAUMA AND CRISIS COUNSELLING
Relationships Australia 1300 364 277
5 Sera Street, Lane Cove
(02) 9418 8800

VICTIMS OF CRIME ASSISTANCE LEAGUE NSW (VOCAL)
2nd Floor/ 3 -166 Market St (Above Sanity)
Newcastle 2300 (02) 4926 5826

VICTIM SUPPORT LINE (24 hour) Sydney 2000 (02) 9374 3000 FREECALL 1800 633 063

MEDIA REPRESENTATIVES Sue Nelson Quick Thinking Communications Ph 61 2 9907 8241 / 0403 343
275 <http://www.qtcommunications.com/index.html>