

CRITICAL INCIDENT MANAGEMENT PLAN

Introduction

Lincoln Education Australia (LEA) recognises that a critical incident may occur whilst students are undertaking study at its Sydney Campus and that it needs to have in place a plan for delivering a timely and coordinated response to critical incidents.

Critical Incidents

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 plan 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

The Standard 6 of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code 2018) defines a critical incident as "A traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury".



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 example, 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 LEA.

Each critical incident needs to be carefully assessed and managed in line with cultural sensitivities for the student(s) impacted and their families.

Prevention and Preparation

LEA has legal and moral responsibility to provide a safe environment to students, staff and visitors and protect its corporate resources and information. Preventive/ precautionary steps taken by LEA include:

- Regular maintenance and upkeep of all buildings, facilities and equipment
- Robust security measures in and around the Campus including secure access, lighting and CCTV cameras
- Establishment and resourcing of a work health and safety (WHS) committee to monitor and ensure safe practices
- Staff are encouraged to report any possible safety issues to management
- Reporting of suspicious activity and persons in or around the Campus
- Orientation program for new students to include personal safety, emergency contacts and how to respond in an emergency

Whilst it may not be possible to prevent a critical incident, it is imperative that sufficient preparations are in place to respond to a critical incident if and when it occurs to minimise the effect on people, property and resources.

The following steps are taken by LEA 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
- Emergency wardens are to be appointed and trained regularly in emergency procedures
- 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 LEA personnel that are responsible for critical incident responses

In addition, the COO and the Student Experience manager shall maintain a contact list of all relevant community resources including:

- Medical authorities
- Police
- Funeral Directors
- Religious leaders
- Ethnic group leaders
- Consular representatives
- Insurance agents/ companies
- Interpreters
- Counsellors

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 current LEA Business Continuity Plan and this plan
- Undergoing periodic drills of responses to various situations
- For senior staff, knowing how to establish a critical incident response team (see below).

Managing a Critical Incident

The following steps outline the process to be followed when managing a critical incident.

The critical phase is the time immediately after the incident has occurred, or the point in time when LEA becomes aware of the incident. Staff should assess the situation and consider the following:

Notification

When a critical incident occurs, the Chief Operating Officer (COO) is to be informed of the incident immediately. Where a student or staff is injured or need medical attention, the first step is to seek immediate medical attention.

The COO shall then determine the circumstances of the situation and, if necessary, consult with the Academic Dean and/or the Executive Management and assign roles and responsibilities accordingly.

The COO shall then take the following steps:

• Confirm that the person involved in the incident is a LEA staff 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

In the case of an infectious disease or other public health incident, NSW Health shall be notified, and the COO shall act as the liaison point with NSW Health.

Assessment

COO should assess the situation and:

- Confirm the identity of the people involved
- Determine if evacuation or lockdown procedures 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 and staff 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 staff 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 CEO shall discuss and plan an immediate response and ongoing strategy and allocate specific roles and responsibilities
- Once the student is not in danger and receiving medical attention resume activities if appropriate

Intervention

The COO 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/ staff 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 LEA 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, arrange appropriate transportation or accommodation for members of the family at cost recovery to 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

Once the student recovers, the relevant staff member Student Experience Manager shall keep in contact with the student and relevant others, such as by making daily welfare-check calls. They shall also check to ensure if the student is receiving ongoing help with medical conditions and counselling.

Investigation

To ensure that the incident is accurately recorded, the COO 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

Follow up

The COO shall monitor the need for counselling and other support for those affected by the incident and arrange for the necessary assistance as required.

If a student has died:

- Discuss funeral arrangements with the student's family
- At all times, seek to accommodate the cultural and religious customs of the deceased's family



Reporting

There is likely to be media reports on a critical incident. External stakeholders, students and staff who are/were involved in the incident, and the families and friends of students and staff shall need to be provided information on the critical incident.

The COO shall coordinate communication, taking advice if possible, including from emergency services personnel. LEA shall issue an official statement expressing LEA's commitment to the health, safety and security of its staff and students, summarising the actions that LEA is taking to uphold this commitment, and providing updates on the incident as appropriate.

LEA shall ensure that any information provided:

- is not misleading
- does not breach LEA's ethics and privacy policy
- does not jeopardise or misrepresent police or legal processes

Written reports, signed and approved by the student where appropriate, are to be put on the student's file and on LEA's Critical Incident file. Copies of this report may be sent to the student's parents and other relevant authorities if the student permits.

The National Code 2018, Standard 6.8 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.

In addition, the *Educational Services for Overseas Students Act 2000* (ESOS Act) requires LEA to notify the Department of Home Affairs and the Department of Education, Skills and Employment as soon as practical. LEA shall also keep TEQSA fully informed of the critical incident.

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).

Compliance

All staff members and students at LEA are required to comply with this plan and its procedures and with related policies and respective procedures. Non-compliance may result in disciplinary action.

| File Number LEA-GEN-COR-90022-D | |
|---------------------------------|-------------------------|
| Responsible Officer | Chief Executive Officer |
| Contact Officer | Chief Operating Office |



| Legislative Compliance | Higher Education Standards Framework (Threshold Standards) 2015 Tertiary Education Quality and Standards Agency Act 2011 | |
|-----------------------------|--|--|
| Supporting Documents | rentary Laucation Quanty and ottandardorigency rice 2011 | |
| Related Documents | Business Continuity Plan | |
| | Risk Management Plan | |
| | Risk Management Policy | |
| Superseded Documents | | |
| Effective Date | 1 January 2022 | |
| Next Review | 3 years from the effective date | |

Review Schedule

The *Critical Incident Management Plan* shall be reviewed by the Corporate Governance Board every three years.

| Version History | | | | | |
|-----------------|-------------------------------|----------------|-----------------|--|--|
| Version number: | Approved by: | Approval Date: | Revision Notes: | | |
| 1.0 | Corporate Governance Board | DRAFT | New plan | | |
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Critical incident Response Checklist:

| Critical Incident Type: | | |
|-----------------------------------|-----------------|-------------------------------------|
| Date: | | |
| Name of staff member | | |
| coordinating response: | | |
| Position at LEA: | | |
| Incident response: | Tick | Notes (e.g. time of action, details |
| | When completed: | to include in final report). |
| 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 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 CEO. | | |
| Record decisions and actions. | | |
| Identify key business operations | | |
| that have been disrupted. | | |
| Complete a report to submit to | | |
| the Risk Management | | |
| Committee. | | |