

Critical Incident Policy and Procedure

1. Purpose

Australian Learning Group (ALG) is committed to effectively managing critical incidents in accordance with Standard 6 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018). This policy and procedures contained within, establish and document how ALG manages critical incidents. It outlines how ALG identifies, prepares for, responds to, reports and records critical incidents as they may occur.

2. Scope

The Critical Incident Policy applies to all critical incidents affecting ALG staff and students and visitors where applicable, regardless of location.

3. Policy

Identifying Critical Incidents

- 3.1. ALG identifies critical incidents in accordance with the National Code 2018. Critical incidents are traumatic events, or threat of such (within or outside Australia), which causes extreme stress, fear, or injury. Critical incidents include but are not limited to:
- missing students;
 - severe verbal or psychological aggression;
 - death, serious injury or any threat of these;
 - natural disaster;
 - issues such as domestic violence, physical, sexual, or other abuse; and
 - other non-life-threatening events.

Preparing for Critical Incidents

- 3.2. Designated ALG staff members undergo periodic training to ensure they know how to respond to critical incidents, including training on the following matters:
- first aid;
 - periodic drills of responses to various situations;
 - the Emergency Action Plan; and
 - this policy and procedures contained within.
- 3.3. In preparation to respond to critical incidents, ALG maintains the contact information of essential bodies as outlined in Appendix A.
- 3.4. The Student Experience Team maintains a contact list of relevant community resources including:
- emergency services;
 - medical services;

- legal services;
- funeral directors;
- religious leaders;
- consular representatives;
- insurance agents or companies;
- interpreters; and
- counsellors.

Responding to Critical Incidents

- 3.5. Critical incidents are managed with the foremost goals of preserving life, protecting property, and restoring normal operations as quickly as possible.
- 3.6. Where critical incidents occur, a Critical Incident Management Team will be formed consisting of:
 - the General Manager (or another Senior Manager);
 - a member of the Academic Team;
 - a member of the Student Experience Team; and
 - the first response officer.
- 3.7. ALG responds to critical incidents in accordance with the steps in the Critical Management Plan outlined in Appendix B unless in the case of a missing student or the death of a student wherein specific procedures outlined in Section 5 must be followed.
- 3.8. ALG's response is evaluated following each critical incident. Any improvements identified will be implemented as required as part of ALG's continuous improvement system.

Reporting Critical Incidents

- 3.9. ALG reports critical incidents to the Department of Home Affairs via PRISMS as soon as practical after where an overseas student is missing, dies, or serious injury prevents the student from attending classes.
- 3.10. ALG also reports incidences of and responses to critical incidents to:
 - the Health, Safety and Wellbeing Committee;
 - students and staff involved in the incident;
 - families of affected persons; and
 - the emergency contact of the affected person.
- 3.11. ALG may need to report critical incidents for insurance related purposes. In these cases, where expenses are involved the General Manager and/or Chief Financial Officer are to liaise with the insurance provider.
- 3.12. The General Manager coordinated communication with the media where necessary. Other than the General Manager, members of ALG staff do not communicate with the media concerning a critical incident unless they have prior approval to do so.
- 3.13. ALG shall ensure that any information reported:
 - a) is not misleading;

- b) does not breach privacy principles; and
- c) does not jeopardise or misrepresent police or legal processes.

Record Retention

- 3.14. ALG maintains written records of any critical incident and remedial action taken for at least two years after the overseas student ceases to be an accepted student in accordance with the Record Retention Policy and Procedure.

4. Responsibilities

Chief Executive Officer (CEO)

- 4.1. The CEO has responsibility for the implementation of the Critical Incident Policy and Procedure across ALG.

General Manager

- 4.2. The General Manager is responsible for ensuring the Critical Incident Policy and Procedure is implemented across operations in accordance with instruction from the CEO.

Critical Incident Response Team

- 4.3. The Critical Incident Response Team is responsible for responding to critical incidents as they arise.

Health, Safety and Wellbeing Committee

- 4.4. The Health, Safety and Wellbeing Committee:
- a) reviews the Critical Incident Register at regular meetings;
 - b) is responsible for ensuring the availability of appropriate resources and the development of safety measures which are monitored through regular meetings; and
 - c) reports to the Board of Directors each quarter on any critical incidents.

Staff

- 4.5. All ALG staff members are responsible for:
- a) immediately reporting and responding to any critical incidents that they experience or witness;
 - b) responding to notifications of critical incidents from students, visitors, and relevant persons in accordance with this policy; and
 - c) ensuring their knowledge of this policy to be equipped to respond to critical incidents.

Students

- 4.6. Students are responsible for:

- a) immediately notifying ALG of any critical incidents that they experience or witness;
- b) ensuring that they hold and maintain Overseas Student Health Cover (OSHC) in accordance with student visa requirements; and
- c) providing their personal contact information and the information of their emergency contact and ensuring that these details are up to date. Students must notify ALG of any changes within 7 calendar days.

5. Procedure(s)

Critical Incident Management Plan

- 5.1. For all critical incidents not otherwise specified below, ALG adheres to the procedure outlined in the Critical Incident Management Plan outlined in Appendix B.

Missing Overseas Student

- 5.2. ALG follows the below procedure in the case of a missing overseas student.
 - 1) The Student Experience Team identifies that a student is missing when:
 - they are officially reported as missing to the local police; or
 - are missing during ALG endorsed activities, after reasonable attempts have been made to locate and contact them; or
 - staff members are made aware that the student may be missing by another student, trainer, agent, or family member; or
 - they are unable to be contacted after repeated attempts to contact them by phone and email, where a reasonable concern for their safety exists.
 - 2) The Student Experience Team member compiles as much information as possible related to this student including but not limited to name, possible location, physical description, any friends, or other contact persons.
 - 3) The Student Experience Team notifies the General Manager who forms the Critical Incident Response Team.
 - 4) The Student Experience Team completes the Critical Incident Checklist and logs the incident in the ALG Critical Incident Register within 48 hours of identifying that the student is missing.
 - 5) The General Manager informs the local police at this stage and obtains an event number that will be included in the Critical Incident Register.
 - 6) The Student Experience Team notifies the student's recorded emergency contact.
 - 7) The Student Experience Team continues with attempts to contact the overseas student through various methods including calls, emails, the education agent, and other contacts.

- 8) If after 7 calendar days no response is received from the student, ALG will report the missing student to the Department of Home Affairs through PRISMS or contact them if further clarification is needed.

Death of Overseas Student

5.3. ALG follows the below procedure when there is a death of an overseas student.

- 1) ALG is notified of and confirms the death of an overseas student by:
 - receipt of a copy of a death certificate; or
 - notification from an emergency service.
- 2) ALG notifies the students' emergency contact and informs them of the death with utmost sensitivity and consideration.
- 3) The General Manager forms a Critical Response Team and coordinates with relevant ALG staff members to undertake the administrative matters of:
 - ceasing all communications to the deceased student;
 - assessment of fee related matters including arrangement of refunds of unspent tuition fees or review of outstanding debts;
 - recording details in the student's file in the Student Management System; and
 - administratively withdrawing the student from the Student Management System and all other relevant systems.
- 4) The Critical Incident Response Team coordinates with the Admissions Team to inform the Department of Home Affairs of the death of an overseas student through PRISMS.
- 5) Where applicable, the Critical Incident Response Team coordinates further contacts with other relevant persons including but not limited to:
 - the nominated education agent;
 - sponsor of the overseas student;
 - accommodation provider;
 - consulate;
 - other students; or
 - staff members.
- 6) Where applicable, the Critical Incident Response Team coordinates the following:
 - counselling of students and staff;
 - condolence letters;
 - debriefing sessions;
 - organisation of a funeral or memorial service in consultation with the overseas student's family;
 - organisation of repatriation; and

- arrangements for the student's possessions to be stored or sent to family.

6. Definitions

The definitions of key terms relevant to this document are contained in the ALG Glossary.

7. Related Documents

This policy and procedures should be read in conjunction with the following:

- Critical Incident Register
- Emergency Action Plan
- Record Retention Policy and Procedure
- Continuous Improvement Policy and Procedure.

8. Document Information and Review

Document Information		
Document ID	STU016	
Policy Category	Student Support and Progression	
Audience	Students and Staff	
Document Owner	Quality Assurance Manager	
Key Stakeholder(s)	Chief Executive Officer, Head of Student Administration and Campus Operations, People and Culture Manager	
Approval by	General Manager	
Date of Approval	22 May 2024	
Date Effective	22 May 2024	
Date of Next Review	22 May 2027	
Version History		
Version	Date	Amendment(s)
1.0	22 May 2024	<ul style="list-style-type: none"> • alignment with National Code 2018 • broadening of scope • refinement of procedures for clarity • updates to Critical Incident Checklist to align with the Critical Incident Management Plan • clarification of responsibilities • editorial updates

Appendices

Appendix A – Essential Contact Information

Contact	Information
ALG	<ul style="list-style-type: none"> Email: support@alg.edu.au Phone: 1300 254 000
Police	<ul style="list-style-type: none"> Emergencies: 000 Non-Emergencies: 131 444
Department of Home Affairs	<ul style="list-style-type: none"> In Australia: 131 881 Outside Australia: +61 2 6196 0196
Student's Emergency Contact	<ul style="list-style-type: none"> As recorded in the Student Management System

Appendix B – Critical Incident Management Plan

Critical Incident Management Plan	
Stage 1	Notification
Time	At the time of the incident
Actions	<ul style="list-style-type: none"> • Any staff, student or visitor involved in, or witnessing a critical incident must immediately notify the Student Experience Team. • The First Response Officer will assess the situation and offer immediate assistance to persons involved. Based on the nature of the incident the Officer will contact the relevant Emergency Services, if not already notified. • The First Response Officer will then immediately report the incident to the General Manager or another Senior Manager. • A Critical Incident Response Team will be formed. • Where the critical incident involves suspected criminal activity, the matter is reported to the police, regardless of any issues of consent or confidentiality.
Stage 2	Assessment
Time	At the time of the incident
Actions	<ul style="list-style-type: none"> • The Critical Incident Response Team will use the 'Critical Incident Response Checklist' in Appendix C, and: <ul style="list-style-type: none"> a) confirm the identity of the people involved b) determine if evacuation or lockdown procedures need to be implemented c) ensure, where a student is injured, that the student is safe and receiving appropriate medical attention in a safe environment d) ensure that other students, workers, and visitors are safe e) 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 f) at the earliest time interview the student and/or relevant person to ascertain what happened and to identify any ongoing issues g) 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) h) if necessary, call an interpreter and have them stand by for assistance <ul style="list-style-type: none"> i) if the critical incident involves a student with a psychiatric disability, determine the extent of information that can be provided given the privacy considerations.

	<ul style="list-style-type: none"> • Campus activities are only resumed if appropriate and only once the student is not in danger and receiving medical attention.
Stage 3	Intervention
Time	At or after the time of the incident
Actions	<ul style="list-style-type: none"> • Using the 'Critical Incident Response Checklist' in Appendix C, the Critical Incident Response Team will contact the relevant people (the order shall be determined by the specific circumstance): <ol style="list-style-type: none"> a) if necessary, liaise with the police regarding notification to the student's member's family and other relevant matters b) ensure that the person's emergency contact as recorded in the Student Management System is informed and updated on the current situation and assure that ALG shall arrange or provide support c) where the person is an overseas student, keep the family informed regularly and if necessary, arrange interpreter services for the family d) keep in contact with the student's accommodation provider and housemates, providing appropriate levels of information and support e) organise student and staff counselling and debriefing sessions as appropriate. • The Critical Incident Response Team may keep in contact with the student and other relevant personnel 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.
Stage 4	Investigation
Time	At or after the time of the incident
Actions	<ul style="list-style-type: none"> • Using the 'Critical Incident Response Checklist' in Appendix C, the Critical Incident Response Team will: <ol style="list-style-type: none"> a) collect facts about the incident b) log incident in the electronic ALG Critical Incident Register in 48 hours of the incident, c) determine the cause of the critical incident d) assess if any gaps in processes or training may have impacted the incident. • Based on the investigation, the Critical Incident Response Team determines any remedial actions to be taken for impacted persons.
Stage 5	Follow Up
Time	After the incident
Actions	<ul style="list-style-type: none"> • The Critical Incident Response Team may implement the following support after the incident always ensuring the continuous safety and welfare of staff members and students: <ol style="list-style-type: none"> a) set up a recovery room, if necessary

	<ul style="list-style-type: none">b) arrange counselling sessions as neededc) provide support and assistance to relevant services and bodiesd) debrief all relevant people. <ul style="list-style-type: none">• The Critical Incident Response Team keeps in contact with the affected student(s) to ensure progress and recovery.• The Critical Incident Response Team identifies any corrective actions or continuous improvements identified from the Investigation stage and logs in the Continuous Improvement Register for implementation.
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Appendix C – Critical Incident Response Checklist

Critical Incident Response Checklist		
Critical Incident Type		
Date of Incident		
Name of staff member coordinating the response		
Position at ALG		
Critical Incident Response Team Members		
Name of student(s) affected		
Stage 1. Notification		
Incident response:	Check:	Notes
Student Experience Team is notified	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
First Response Officer is notified	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Emergency services notified	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
General Manager notified	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Critical Incident Response Team formed	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Police notified	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Stage 2. Assessment		
Incident response:	Check:	Notes
Confirm identify of persons involved	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Determine whether evacuation or lockdown procedures are needed	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Ensure student is safe and receiving appropriate medical	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

attention in safe environment		
Ensure safety of other students, staff, and visitors	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Obtain accurate details of incident	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Interview student and/or relevant persons to obtain further details and identify ongoing issues	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Obtain details of student (ID, address, next of kin, nationality, religion, medical conditions, OSHC)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Organise interpreter	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Evaluate privacy considerations	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Resume campus activities	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Stage 3. Intervention		
Incident response:	Check:	Notes
Liaise with police to notify family members and regarding other relevant matters	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Inform student's emergency contact	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Continue to keep the student's family informed regularly (with interpreter service if needed)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Inform students accommodation provider and/or housemates providing appropriate levels of information	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Organise further staff and student counselling or debriefing	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Maintain contact with the student through welfare calls	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Stage 4. Investigation		
Incident response:	Check:	Notes
Collect facts about incident	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Log incident in Critical Incident Register within 48 hours	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Determine cause of the incident	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Assess if any gaps in processes or training may have impacted the incident	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Determines any remedial actions to be taken for impacted persons	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Stage 5. Follow Up		
Incident response:	Check:	Notes
Set up a recovery room	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Arrange counselling sessions	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Provide support and assistance to relevant services and bodies	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Debrief all relevant persons	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Monitor progress of student	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Identify continuous improvements or corrective actions	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	