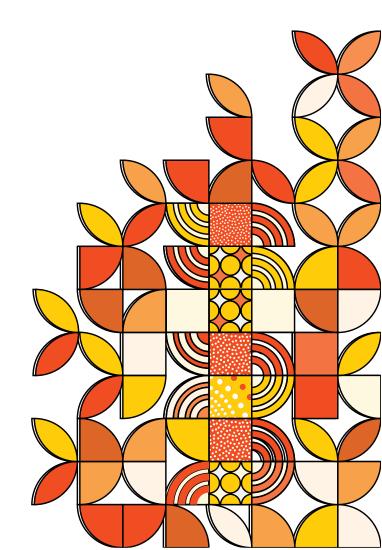


Legal entity: INSTITUTE OF HEALTH & MANAGEMENT PTY LTD. Category: Institute of Higher Education CRICOS Provider: 03407G | Provider ID: PRV14040 ABN: 19 155 760 437 | ACN: 155 760 437

# **Critical Incident Response Policy**



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# SECTION 1

#### Purpose

- 1. The purpose of this policy is to manage critical incidents, ensuring, possible prevention, documentation, communication and appropriate corrective action by Institute of Health & Management (IHM).
- 2. This Policy outlines the processes to be followed in response to a Critical Incident that may occur at any of IHM's campuses in Australia or in response to critical incidents that may occur at locations in which students of IHM may be studying as part of their course (whether inside or outside Australia) and is designed to ensure that the IHM will:
  - a) Meet its duty of care obligations to provide a safe environment
  - b) Ensure the highest standards of health and safety are maintained for all staff, students, and individuals working at or visiting the Institute.
  - c) Respond swiftly and effectively in the event of a Critical Incident, disaster or crisis.
  - d) Allocate adequate resources and foster relationships to effectively manage incidents and critical incidents, ensuring compliance with IHM's obligations and standards.
  - e) Evaluate the effectiveness, adequacy, and ongoing relevance of incident and critical incident responses to ensure consistency.
- 3. This policy aligns with the:
  - a) Higher Education Standards Framework (Threshold Standards) 2021: Standard 2.3 Wellbeing and Safety
  - b) National Code of Practice for Providers of Education and Training to Overseas Students (2018), Standard 6: Overseas student support services

#### Scope

- 4. This policy applies to students enrolled in a course of study at IHM including:
  - a) All on shore international students, to whom the Education Services for International Students Act 2000 applies.
  - b) All students enrolled in an ongoing course of study that is delivered fully online or through any form of distance education that does not involve students' presence at a designated physical location.
  - c) All domestic students.
  - d) ALL ELICOS students.
  - e) All staff who will be in contact with students.
  - f) Activities and locations associated with IHM, including third-party arrangements and placements.

# Definitions

5. Refer to <u>IHM's Glossary of Terms</u>.

# Suite documents

- 6. This policy is linked to the following documents:
  - a) Critical Incident Response Procedure
  - b) See Associated Information listed in the 'Related Internal Documents' in Section 3 below.

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# SECTION 2

# Policy

# 7. **Principles**

- 7.1 IHM recognises that a Student Critical Incident involves a traumatic event, or threat thereof, that may cause extreme stress, fear, or harm to students, staff, or the broader community. This includes incidents such as missing persons, violent behavior, accidents, natural disasters, suicide risks, and any other events necessitating immediate intervention.
- 7.2 IHM prioritizes the safety, physical and mental health, and overall wellbeing of students by adopting a studentcentric approach that emphasizes prevention, timely response, and comprehensive support services.
- 7.3 All students, including domestic, international, and online cohorts, will have equitable access to culturally sensitive, inclusive, and tailored support and resources during and after a critical incident.
- 7.4 The Critical Incident Management Team (CIMT) will oversee coordinated responses, including immediate management, ongoing communication, and recovery planning.
- 7.5 Proactive risk assessments will be conducted to identify potential critical incidents and establish preventive measures, with regular training, simulations, and protocol reviews ensuring preparedness.
- 7.6 Structured communication channels will notify affected parties, including families, consular services, and authorities, while adhering to privacy principles for lawful information disclosure.
- 7.7 Detailed records of all critical incidents, including actions, communications, and outcomes, will be maintained, with relevant information shared with regulatory bodies as required.
- 7.8 Collaboration with police, emergency services, hospitals, consular offices, and other authorities will ensure effective incident management, while fostering resilience and safety awareness within the student community.

# 8. Duty of Care

- 8.1 IHM has a duty of care to provide a safe environment for work and study and to take all reasonable measures to minimise the risk of harm and to have in place contingency plans that will minimise and prevent the occurrence of critical incidents.
- 8.2 IHM's duty of care extends to all people who are attending IHM facilities for authorised purposes or who are undertaking activities related to their employment and study with IHM.
- 8.3 In the case of overseas students, the duty of care extends beyond activities directly related to study.
- 8.4 Acknowledge the challenges faced by international students, such as the absence of family support in Australia.
- 8.5 IHM has specific responsibilities to the overall well-being of all students and ensures tailored support for domestic, international, and online students based on their unique needs.
- 8.6 IHM Prioritises safety, wellbeing and continuity of student's education.

# 9. Comprehensive Approach

9.1 IHM establishes a risk based, systematic approach to managing critical incidents and emergency events.

# 10. Timely and responsive communication

- 10.1 IHM has a coordinated, institutional response to critical incidents which is communicated in a timely and responsive manner to all students, staff and third-party providers of IHM.
- 10.2 Critical incident management capability is designed and implemented around the following core elements:
  - a) Planning and preparing developing, documenting, training and testing arrangements
    - b) Detecting and mitigating identifying assessing, controlling, treating and monitoring risk
    - c) Responding making people safe, minimising damage to assets, and managing strategic issues and consequences
    - d) Recovering implementing business continuity arrangements and repairing negative impacts
    - e) Learning and adapting reviewing and improving arrangements

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#### 10.3 **Provision of information to students**

- a) IHM will make this policy readily available to students and to the best to IHM's ability ensure that students know that is exists and where to find it
- b) IHM will provide information to students about how to make a report and where to seek assistance for an incident that significantly impacts on their wellbeing, including critical incidents
- c) IHM student support services are the designated Student Contact Officers, and will be the first point of contact for students
- d) IHM will ensure that students are given age appropriate and culturally appropriate information on:
  - I. Who to contact in emergency situation, including contact numbers of a nominated staff member and /or CIRT of IHM
  - II. Seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical, or other abuse

# 11. Responsibility

- 11.1. A member of staff, student or visitor involved in witnessing or becoming aware of a Critical Incident must immediately contact the relevant campus using the phone numbers listed below.
- 11.2. Where the Critical Incident involves a threat to the institute, the Campus Manager/Deputy Campus Manager on each campus should be notified immediately.
- 11.3. The Campus Manager/ Deputy Campus Manager has the overall responsibility to ensure the effective implementation of this policy and procedure.
- 11.4. The responsibilities of Critical Incident Response Team (CIRT) are enumerated further as below:
  - a) **Incident Identification and Risk Control**: Identify the cause of the critical incident, assess risks, and take measures to control further hazards or risks.
  - b) **Risk Assessment and Management**: Evaluate risks associated with potential hazards and emergencies, implement safety measures, and monitor their effectiveness.
  - c) Hazard Analysis: Determine requirements and develop plans to address identified hazards.
  - d) Liaison with Emergency Services: Coordinate with relevant emergency services, such as police, fire brigade, ambulance, hospitals, poison information centers, and community health or emergency services.
  - e) **Support for Wellbeing**: Ensure the wellbeing of staff and students after the incident and arrange counseling or trauma services when requested or deemed necessary.
  - f) Access to Contact Information: Maintain 24/7 access to contact details for students, their families, and relevant staff members, including the Critical Incident Team leader.
  - g) **Critical Incident Plans**: Develop specific plans for each identified critical incident.
  - h) **Communication and Training**: Disseminate procedures, conduct practice drills, and provide training for staff to handle critical incidents effectively.
  - i) **Consultation with Stakeholders**: Engage with staff and students to improve awareness and preparedness for critical incidents.
  - j) **Collaboration with Authorities**: Liaise with emergency response agencies and relevant government departments, such as the Department of Home Affairs and the Department of Education.
  - k) **Monitoring and Updates**: Regularly review and update critical incident response measures to ensure they remain effective and continue to support affected students and staff.

#### 12. Classification and escalation process

- 12.1. A Level 1 (minor) incident is a local event or issue that:
  - a) Has no more than a minor impact rating in any risk category and little or no potential to escalate
  - b) Can be resolved satisfactorily through standard procedures and channels
  - c) Can be managed satisfactorily at the local level by on-site personnel, which may include CIRT if the incident is an emergency.

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- 12.2. A Level 2 (moderate) incident is an even or issue that:
  - a) Has no more than moderate impact in any risk category but potential to escalate
  - b) May not necessarily be resolved and input to manage, which may include a business continuity response and, if the incident is an emergency, ICRT may be contacted.
- 12.3. A Level 3 (critical) incident is a situation with a substantial, major or catastrophic impact rating in any risk category and will be an event or issue that:
  - a) has a long-term or profound effect
  - b) cannot be controlled through standard procedures and channels
  - c) needs high levels of resources and inputs to manage, which will include the Critical Incident Management Team and may include a Business Continuity response and if the incident is an emergency, an Emergency Response Team.

#### 13. **Privacy and Disclosure**

- 13.1. The Privacy Act 1988: Crushing APP Compliance permits IHM to disclose personal information about someone to a party outside IHM where:
  - a) A person consents in writing to their personal information being disclosed; or
  - b) IHM believes, on reasonable grounds, that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person/people; or
  - c) The disclosure is required or permitted by law, or made in compliance with IHM's Privacy Policy and Procedure

#### 14. Critical Incident Support

14.1. Following an incident, IHM will arrange for timely and appropriate medical, psychological (counselling) and academic and other support for students or staff who have been directly and/or indirectly affected

#### 15. **Response for Specific Groups**

- 15.1 **Domestic Students**: Collaborate with local authorities and community resources to support affected individuals.
- 15.2 International Students: Liaise with consular services, provide temporary accommodations if needed, and facilitate visa-related support.
- 15.3 Online Students: Ensure all communication and services are accessible virtually

#### 16. Compliance

- 16.1. This policy is in compliance with IHM obligations under the Education Services for Overseas Student (ESOS) Legislative Framework in relation to critical incidents involving overseas students, particularly the National Code of Practice for Providers of Education and Training for Overseas Students (2018).
- 16.2. This policy meets the requirements as laid out in the Higher Education Standards Framework (Threshold Standards) (2021)

#### 17. Recordkeeping

17.1. All records created under this policy, including details of each critical incident and any remedial actions taken, must be retained in compliance with IHM's Records Management Policy and Procedure, ensuring proper documentation, secure storage, and accessibility for auditing and reporting purposes.

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#### 18. Reporting a Critical Incident to Emergency Services

18.1. In the event of a critical incident a staff member, student or visitor must contact the relevant Emergency Services on the following numbers.

Emergency Services	Contact Number
Police/Life threatening emergencies	000
Fire Emergencies	000
Ambulance/Life threatening emergency/injury	000

#### 19. Contact numbers for IHM campuses

19.1. The Campus Manager or Deputy Campus Manager can be contacted at the following numbers. They will respond to the incident, liaise with Emergency Services, and provide a detailed report regarding the situation.

Campus / Office Location	Address	Contact Number (24/7)
North Melbourne Campus	203/ 187, Boundary Rd, North Melbourne, VIC 3051, Australia	+61 394505111
Sydney Campus	Ground Floor, 1 Wentworth Street, Parramatta, NSW 2150, Australia	+61 448125814
Perth Campus	Level 4, 12 St Georges Terrace, Perth, WA 6000, Australia	+61 423389342

# **SECTION 3**

#### **Associated Information**

Related Internal Documents	Access and Equity Policy
	Access and Equity Procedure
	Accessibility Policy
	Accessibility Procedure
	Critical Incident Report Form
	Critical Incident Response Procedure
	Cyber Safety and Security Policy
	Cyber Safety and Security Procedure
	Health and Safety Policy
	Health and Safety Procedure
	IHM Business Code of Conduct and Ethics
	IHM Risk Register
	Records Management Policy
	Records Management Procedure
	Risk Management Policy
	Risk Management Procedure
	Sexual Assault and Sexual Harassment Policy
	Sexual Assault and Sexual Harassment Procedure
	Student Code of Conduct Policy
	Student Code of Conduct Procedure
	Student Misconduct Policy

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CodesHigher Education Standards Framework (Threshold Standards) 2021TEQSA Guidance Notes: Wellbeing and SafetyEducation Services for Overseas Students Act 2000National Code of Practice for Providers of Education and Training to Overseas Students 2018: Standard 6Date Approved24.11.2023Date of Effect25.11.2023Date of Next Review01.11.2026Approval AuthorityAudit and Risk CommitteeResponsibility for implementationCampus Manager / Deputy Campus Manager / Critical Incident Response Team (CIRT)Document CustodianAudit and Risk Committee		Student Misconduct Procedure	
Related Legislation, Standards, and CodesTertiary Education and Quality Standards Agency Act 2011 Higher Education Standards Framework (Threshold Standards) 2021 TEQSA Guidance Notes: Wellbeing and Safety Education Services for Overseas Students Act 2000 National Code of Practice for Providers of Education and Training to Overseas Students 2018: Standard 6Date Approved24.11.2023Date of Effect25.11.2023Date of Next Review01.11.2026Approval AuthorityAudit and Risk CommitteeResponsibility for implementationCampus Manager / Deputy Campus Manager / Critical Incident Response Team (CIRT)Document CustodianAudit and Risk Committee		Student Support Services Policy	
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Date of Next Review       01.11.2026         Approval Authority       Audit and Risk Committee         Responsibility for implementation       Campus Manager / Deputy Campus Manager / Critical Incident Response Team (CIRT)         Document Custodian       Audit and Risk Committee	Date Approved	24.11.2023	
Approval Authority       Audit and Risk Committee         Responsibility for implementation       Campus Manager / Deputy Campus Manager / Critical Incident Response Team (CIRT)         Document Custodian       Audit and Risk Committee	Date of Effect	25.11.2023	
Responsibility for implementation       Campus Manager / Deputy Campus Manager / Critical Incident Response Team (CIRT)         Document Custodian       Audit and Risk Committee	Date of Next Review	01.11.2026	
Team (CIRT)       Document Custodian       Audit and Risk Committee	Approval Authority	Audit and Risk Committee	
	Responsibility for implementation		
IHM-CIRP1-4.2	Document Custodian	Audit and Risk Committee	
	IHM Doc ID	IHM-CIRP1-4.2	

# **Change History**

Version Control		
Change Summary	Date	Short description of change, incl version number, changes, who considered, approved etc
Version 4 Version 4.1	06/09/2021	<ul> <li>Policy and Procedure are now in two separate documents</li> <li>Definitions have been added</li> <li>Minor editorial changes have been made</li> <li>Clauses on Provision of information to students, classification and escalation process, Privacy and Disclosure, critical incident support, recordkeeping are added</li> <li>Version 4 approved by Academic Board on December 2021</li> <li>Transfer into new template</li> <li>Definitions linked to Glossary of Terms</li> </ul>
Version 4.2	20/11/2024	<ul> <li>Minor editorial changes have been made</li> <li>Changes to align policy and procedure with National Code 2018 and HESF 2021 Standards based on the feedback from TEQSA CRICOS review</li> <li>Included equitable provisions for domestic, international, and online students.</li> <li>Clarified roles and responsibilities of CIRT</li> </ul>

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