

Critical Incident Policy

Scope

This policy applies to Kaplan International Languages schools (each a “School” and collectively the “Schools”) and to critical incidents that may occur while students are undertaking study at the School.

Purpose

The purpose of the Critical Incident Policy is to:

- provide the rationale and rules for managing critical incidents that may occur while students are undertaking School courses or subjects.
- establish the management plan for critical incidents as they may occur at the School.

What is a critical incident?

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 policy the following events are defined as critical incidents:

- Serious injury or death
- 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 seriously affect 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)
- Any student going missing.

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. Every critical incident is unique and will need to be dealt with differently and according to the needs of the

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

In assessing a critical incident, consideration must be given to:

- how public the incident is
- the number of people affected, and
- the existing factors and mood of the staff and/or students at the time of the incident.

The Critical Incident Management Plan section of this policy clearly outlines the processes to be followed in managing a critical incident involving students.

Prevention and preparation

Emergency evacuation notices illustrating the location of assembly in the event of a fire or other emergency are to be prominently displayed throughout the building. Emergency wardens are to be appointed and trained regularly in emergency procedures. The availability of appropriate resources and the development of safety measures are to be monitored on a regular basis through the WHS contact in the People and Culture Team and relevant managers. Regular practice of building evacuations are to be carried out and staff encouraged to report any possible safety issues to management. New staff are to be made aware of the Critical Incident Policy as part of induction process.

The relevant Student Services Managers should maintain a contact list of relevant community resources including:

- Medical agencies including welfare and counselling
- Police
- Funeral Directors
- Religious leaders
- Ethnic group leaders
- Consular representatives
- Insurance contacts
- Interpreters.

Critical Incident Management plan

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

1.Critical Phase

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

- Ensure that the student is safe and receiving appropriate medical attention in a safe environment
- Ensure that other students and staff are safe
- Determine if evacuation procedures need to be implemented
- Report the incident to the relevant School Manager (e.g. School Principal or Campus Manager).
- Contact relevant authorities as appropriate (e.g. police, ambulance)

- If necessary, call an interpreter and have them stand by for assistance
- Once the student is not in danger and receiving medical attention resume activities if appropriate
- At the earliest time interview the student and/or relevant staff to ascertain what happened and to identify any ongoing issues
- Support other students or arrange counselling support
- Address any other immediate needs, such as organising police reports e.g. to report stolen goods etc.
- Follow the procedures outlined in Appendix 1 in the case of a death of a student.

2.Ongoing Supervision and follow-up

Once the incident has been managed and necessary contact has been made with relevant personnel, it is important that a nominated Kaplan Manager, undertakes appropriate follow-up of the student regarding the Critical Incident. This may include:

- Keeping in contact with the student and relevant others, such as by making daily welfare-check calls. or notifying the Partner University or Institution if the student is unlikely to start at the University or Institution at the expected time due to the critical incident.
- Checking that the student is receiving ongoing help with medical conditions and counselling
- Passing on findings to the appropriate manager and other relevant people.

3.Investigation Process

To ensure that the incident is accurately recorded and managed the nominated School Manager (e.g. School Principal or Campus Manager), should:

- Collect facts about the incident (e.g. injuries or damage sustained, any witnesses, information from the scene). This may be in written form or through the use of media such as photographs as appropriate
- Examine any work/operating procedures or training gaps that may have impacted the incident
- Determine the cause of the accident/incident paying attention to contributing factors, environmental factors, mechanical failure or systems failure
- Review work procedures, training, and/or safe operating procedures, and
- Document recommendations and communicate results of investigation to relevant managers.

4.Reporting

Written and/ or verbal reports are provided to the relevant manager including any recommendations on ways to prevent similar occurrences. Media enquiries should be referred to the Executive Director People and Culture, or another member of the Executive Team, depending on the incident. Written reports, signed and approved by the student where appropriate, are to be put on the student's file and on the School's Critical Incident file. Copies of this report may be sent to the student's parents and other relevant authorities if the student permits. Following any critical incident, the nominated School Manager should complete the Checklist in Appendix 2. This should also be filed with the report in the School's Critical Incident file.

Relevant Legislation

- Education Services for Overseas Students (ESOS) Act 2000
- The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018
- Education Services for Overseas Students Regulations 2019
- ELICOS Standards 2018
- Department of Home Affairs

Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this policy.

Policy Category	Governance (Corporate Legal)			
Responsible Officer	General Counsel			
Implementation Officer	Principal Executive Officer			
Approved by				
Principal Executive Officer				
Change and Version Control				
Version	Authored by	Brief Description of the changes	Date Approved:	Effective Date:
2.0	Quality, Regulation and Standards	New policy for KIL based on policy approved by Kaplan Australia	28.08.2020	11.09.2020

Appendix 1 – Procedures in case of student death

In the case that an incident results in the death of a student, the relevant School Manager, (e.g. School Principal or Campus Manager), should form a Coordinating Committee that is comprised of relevant managers and student advisor representatives, where appropriate. 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
 - DIBP, Consulate, Sponsor, agent, Accommodation provider (for overseas students).
 - Partner University
- 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 the School
- 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.

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 2 – Checklist for follow up, review and evaluation

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

1 = poor; 5 = excellent.

Please add comments to clarify your choice if required.

Questions	1	2	3	4	5
Actions taken					
Follow up					
Availability of mobile phones					
Notification of and liaison with Sponsor/ Agent					
Arrangements for Family visit					
Liaison with Police, Doctors, Hospital Staff					
Liaison with Independent Interpreters					
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 Department of Immigration and Citizenship					
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					