



THE UNIVERSITY  
*of* ADELAIDE  
COLLEGE

# Critical Incident Policy

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# Scope

This policy applies to all domestic and international students within or outside Australia, enrolled in Award, Non-Award and ELICOS programs delivered by Kaplan Higher Education Pty Ltd, trading as The University of Adelaide College (College), staff and affiliates. It outlines support mechanisms and procedures for managing a Critical Incident involving students, staff or affiliates.

This policy does not apply to:

- Students enrolled in Award programs delivered by the University of Adelaide at the Adelaide campus; Injuries or accidents that affect an individual or isolated area(s) and do not pose any additional threat or risk to staff, students, contractors, visitors, property or affect the College operations and/or reputation.
- Minor incidents, which will be managed under the Kaplan Health and Safety Policy.

# Purpose

The purpose of this policy is to:

- Provide the framework which outlines the procedures, including preventative measures, immediate responses and follow-up actions and reporting systems required to deal with immediate consequences and potential long-term implications of a Critical Incident.
- Provide guidance to staff and students on how to respond to Critical Incidents that may cause trauma to individuals and also affect the College.

# Policy Statement

The College is committed to providing and maintaining a safe environment for all staff, students, and visitors and recognises that a Critical Incident may happen at any time. Staff and students will be provided with information and training to enhance their personal safety and security within and outside Australia. Students will also be given information on how to seek assistance for and report an incident impacting their ability to undertake or complete their program(s) at the College. Under 18 students will be provided with age-appropriate information and support as required.

# Policy Principles

The following principles apply and demonstrate the College's commitment to:

- Protect the health and safety of staff, students, Affiliates, visitors, and the College community.
- Ensure appropriate annual training and information resources are provided to staff.
- Respond rapidly and appropriately to a Critical Incident and provide immediate support, counselling services and clear guidance to those involved.
- Allocate appropriate internal and external resources to manage Critical Incidents in compliance with the College's legal obligations, standards, legislation, and regulations.
- Maintain confidentiality by disclosing Critical Incident information only to those persons who have a right to the information by virtue of their role in the management of Critical Incidents or as required by law.
- Relay accurate information regarding the Critical Incident to all appropriate parties, including parents and family members, education agents, foreign embassies, the police, emergency services, government authorities, and any other relevant organisations which may be able to assist with the Critical Incident.
- Maintain business as usual, where possible, to offer continuity to others.
- Evaluate the effectiveness, adequacy, and ongoing suitability of its Critical Incident responses and implement a practical approach in responding to Critical Incidents as they occur.
- Take steps to monitor, report and summarise Critical Incidents, including analysis and areas for improvement with the aim of identifying and preventing future Critical Incidents.
- Maintain details of each Critical Incident report and action taken in accordance with the College's recordkeeping requirements.

## Definitions

**Affiliates** means consultants and contractors to the College, Kaplan Higher Education employees and any other people appointed or engaged by the College to perform operational or academic duties on its behalf.

**Award** means programs that are Australian Qualifications Framework (AQF) qualifications, and includes diplomas, associate degrees, bachelor degrees, graduate certificates, graduate diplomas or master's degrees.

<b>Critical Incident</b>	means a traumatic event, or threat of a traumatic event (within or outside Australia) which causes extreme stress, fear or injury to a student or students.  Critical Incidents can include but are not limited to: <ul style="list-style-type: none"> <li>• death, serious injury or any threat of these.</li> <li>• critical mental health episodes.</li> <li>• drug or alcohol abuse.</li> <li>• confirmation of a serious infectious disease or virus.</li> <li>• physical, sexual assault, domestic violence, or other abuse.</li> <li>• severe verbal or psychological aggression.</li> <li>• fire or natural disaster.</li> <li>• missing students.</li> <li>• other life-threatening events.</li> </ul>
<b>ELICOS</b>	English Language Intensive Courses for Overseas Students (ELICOS) Programs
<b>International Student</b>	is a person who holds or needs to hold a student visa with rights to study in Australia.
<b>Non-Award</b>	means programs that are non-AQF qualifications. Examples of non-award courses include, Foundation Studies Programs, Non-award Single Subject Enrolment, Postgraduate Qualifying Programs and Undergraduate Qualifying Programs.
<b>TEQSA</b>	Tertiary Education Quality and Standards Agency.
<b>Under 18</b>	is a student who is under 18 years but not younger than 16 years at the time of commencement or during their enrolment.

## Critical Incident Management Team

The National Campus Director is responsible for determining if an incident is critical. In the absence of the National Campus Director, the responsibility will pass to the Student Services Manager. If an incident is critical, the National Campus Director must immediately inform the Managing Director, the Executive Director, Australia and New Zealand (ANZ) University Partnerships and General Counsel, Kaplan Australia.

In response to a Critical Incident, the National Campus Director will lead and select the Critical Incident Management Team (CIMT) at the College level.

In addition to the National Campus Director, the CIMT may include the following staff:

- Senior Student Recruitment Manager
- Academic Managers
- Student Services Manager
- Accommodation Manager
- Campus Manager – Melbourne

Other staff members may be specially appointed to the CIMT depending on requirements, such as communicating with a student's family in their language.

In cases where a Critical Incident impacts business operations, the CIMT may be comprised in part or whole by Kaplan senior executive staff.

The function of the CIMT is to manage the College's response to a Critical Incident, including:

- Implementation of this policy and procedure.
- Assessing risks and response actions.
- Liaising with emergency services and other services.
- Communicating and informing staff, including senior executive staff, of incident details and updates as they occur.
- Contacting students' parents, legal guardians and/or other appropriate contacts.
- Liaising with other external bodies, such as homestays, carers or foreign embassies and consulates.
- Organising counselling and managing students and staff not directly involved in the incident.

The CIMT will set in motion a Critical Incident action plan to manage various aspects arising from the Critical Incident, including:

- Creating and disseminating an action plan and its procedures.
- A review of the plan.
- Staff development and training.

The National Campus Director will inform the University of Adelaide's Educational Policy & Compliance Team and Student Wellbeing and Access Team of any Critical Incident (unless it relates to students in ELICOS programs) as a matter of urgency

The National Campus Director will liaise with the appropriate staff to review and update the Critical Incident Policy and Procedure after any Critical Incident and arrange debriefing, as required.

# Managing the Media

Each Critical Incident is unique, and the dynamics of each situation will have to be assessed when it occurs. It is essential that a structured approach to managing the media is developed and included in the management plan to ensure the most positive and supportive response from the media and to observe the sensitivity of the case. The Kaplan Australia Managing Director (or nominee) will be responsible for any initial media enquiries. Unless approved otherwise, the Kaplan Australia Managing Director will deal with media interviews concerning Critical Incidents.

## Follow-Up Action to a Critical Incident

The CIMT will:

- Consult a professional counselling service to:
  - Provide counselling services as required. Services may include immediate counselling, follow-up counselling, further debriefing and the possibility of ongoing counselling for individuals depending upon the circumstances.
  - Provide a Critical Incident debriefing for staff and students involved in the Critical Incident. Various types of debriefing sessions may be held, depending on circumstances and the need, including:
    - Technical debriefing, e.g., building, facilities and equipment.
    - Critical Incident stress debriefing and/or initial defusing (offered to those affected and conducted by professional counsellors trained in Critical Incident Stress debriefing).
    - CIMT debriefing to take place within 24 hours.
- Assist family members if an International Student dies or sustains a severe injury. It may include:
  - hiring interpreters.
  - providing guidance for making arrangements for hospital/funeral/memorial service/repatriation.

## Dealing with a Death

If a death occurs, a nominated member of the CIMT will contact the deceased's family to offer support.

The CIMT may assist the deceased's family with the following:

- Making arrangements to view the body.

- Finding a funeral director.
- Counselling support.
- Providing support during the police and coronial inquest – including organising interpreting services to understand and consider the cultural sensitivities involving the post-mortem and caring of the body. The General Counsel will liaise with investigators and the police regarding any Critical Incident involving a death.

## Incident Reporting

- The CIMT investigates the Critical Incident within 24 hours to record all facts and data about the Critical Incident.
- In the case of a student's death or other absence affecting the student's welfare, the Critical Incident will need to be reported via the Provider Registration and International Student Management System (PRISMS).
- Maintain confidentiality by disclosing Critical Incident information only to those persons who have a right to the information by virtue of their role in the management of Critical Incidents or as required by law.
- . Where a Critical Incident involves an ELICOS student, Kaplan will be responsible for notifying TEQSA. All other incidents will be reported by the University. Any TEQSA notification will occur no later than 14 days after the provider being aware of the incident.

## Evaluation

The National Campus Director is responsible for assigning a member of the CIMT to prepare a detailed report on the management of the Critical Incident for the CIMT. The CIMT will meet within a fortnight of the resolution of the Critical Incident to consider the report and the College's response to the Critical Incident. The CIMT will use the report to evaluate the response and recommend any necessary improvements to policy and procedures.

## Emergency Contacts

Students are informed through the arrival guide and during orientation of the College's emergency contacts. An Emergency Contacts List is displayed in the common areas of the College and on the College website for easy access. In addition:



- Students are encouraged to use Sonder via the Sonder app, a free 24/7 multilingual safety and wellbeing service provided for all students.
- Students should dial 000 for an emergency requiring Police, Fire or Ambulance.
- The National Non-Emergency Police Assistance Line can be contacted on 131 444, 24/7.
- The Department of Home Affairs can be contacted on **131 881**, 9am to 5pm, Monday to Friday or online via [www.homeaffairs.gov.au](http://www.homeaffairs.gov.au)

## Critical Incident Records

Student records are maintained in the relevant Student Management System (SMS). Confidential notes regarding Critical Incidents are kept in restricted access locations within the SMS.

All records created as a result of a Critical Incident must be retained in accordance with the College's recordkeeping requirements and the Privacy Act, including final reports and outcomes, as well as all actions taken to improve so that such events are not repeated.

Where the Critical Incident involves an International Student written records of the Critical Incident and the remedial action taken must be maintained for at least two years after the International student ceases to be an accepted student.

## Relevant Legislation

The College operates under strict laws and regulations as a registered education provider. Policies and procedures are in place to ensure compliance with such legislation and regulations listed below:

- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)
- Higher Education Standards Framework (Threshold Standards) 2021
- Education Services for Overseas Students Act 2000 (ESOS Act)
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Education Services for Overseas Students Regulations 2019
- English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018
- Education Services for Overseas Students (Foundation Program Standards) Instrument 2021
- Criminal Law Consolidation Act 1935 (SA)
- Privacy Act 1988
- Work Health and Safety Act 2012 and Work Health and Safety Regulations 2012 (SA) Occupational Health and Safety Act 2004 (Vic) and Occupational Health and Safety Regulations 2017
- Modern Slavery Act 2018

## Related Policies

This Policy should be read in conjunction with the following Kaplan policies and documents:

- Kaplan Code of Business Conduct
- Kaplan Corporate Social Responsibility Policy
- Kaplan Health and Safety Issue Form
- Kaplan Health and Safety Management Manual
- Kaplan Health and Safety Policy
- Kaplan Privacy Policy
- Kaplan Sexual Misconduct Prevention and Response Policy
- Kaplan Prevention of Harassment and Bullying Policy
- Kaplan Modern Slavery Policy
- University of Adelaide College Under 18 Policy

## Version Control and accountable officers

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

<b>Policy Category</b>	Corporate			
<b>Responsible Officers</b>	General Counsel and Executive Director – People and Culture			
<b>Implementation Officer</b>	National Campus Director, The University of Adelaide College			
<b>Review Date</b>	August 2025			
<b>Approved by:</b>				
Joint Academic Board				
<b>Version</b>	<b>Authored by</b>	<b>Brief Description of the changes</b>	<b>Date Approved</b>	<b>Effective Date</b>
2.0	Quality, Regulations and Standards Team	Reviewed and updated policy to meet legislative requirements. Added legislation information and related policies with links to websites where these can be found. Added the Critical Incident Flowchart and other resources to be used should it be required.	21/03/2019	21/03/2019
3.0	Quality, Regulations and Standards Team	Split policy & procedure to improve accessibility of public facing policy.	24/08/2023	01/09/2023

