

Critical Incident Management Policy and Procedure

1. Introduction

The Australian Performing Arts Conservatory (APAC) Critical Incident Management Policy and Procedure sets out the principles which define APAC's approach to responding to and managing critical incidents that impact APAC students. This Policy and Procedure should be read in conjunction with the Business Continuity Policy and Procedure, and Risk Management Policy and Procedure.

1.1. Purpose

The intent of this document is to prescribe APAC's approach in responding to and managing critical incidents that impact APAC students, in particular, traumatic events, or the threat of such, causing extreme stress, fear or injury.

1.2. Scope

- This policy and procedure apply to all critical incidents involving APAC's staff, students, contractors, volunteers and visitors.
- This policy and procedure applies to all critical incidents involving students regardless of whether the student was engaged in an APAC-related activity.

1.3. Principles

- Responding to, and managing, critical incidents effectively is an organisational priority of the highest order;
- APAC is committed to the safety and security of all members of APAC's community, and particularly student safety;
- Student safety is considered a foundation of the student experience for study and learning.

2. Policy Statements

2.1. Emergency Planning

APAC will plan for emergencies to ensure that responses are timely and appropriate. The emergency plan is calibrated for particular types of events and, where relevant, plans for specific operational areas.

2.2. Critical Incident Processes

Critical incident processes will be regularly, clearly and comprehensively communicated:

- on the APAC website;
- in the Student Handbook;
- in the Staff Handbook;
- in the 'Support' course on Moodle;
- in the student orientation and staff induction programs; and
- in pre-arrival information for international students.

2.3. Emergency Management Group

APAC will have a designated emergency management group with defined roles and responsibilities. This team is responsible for the response to, and the continuing management of, critical incidents. At meetings, a minute taker will be nominated from within the Group by the Chair.

2.4. Legislative and Regulatory Compliance

Critical incident response and management systems and processes will be compliant with education provider obligations under the Higher Education Standards Framework (Threshold Standards) 2021 and Standard 6 of the National Code of Practice for Providers of Education and Training to Overseas Students (2018).

2.5. Critical Incident Communications

APAC will ensure that all critical incident communications comply with relevant privacy legislation. Additionally, APAC will ensure that personal information relating to the incident is treated confidentially and disclosed only to those persons who have a right to the information by virtue of their role in the process, as required by law, or because of their kinship relationship with affected parties.

2.6. Adverse Impact on Student/s

APAC acknowledges that a critical incident may have an adverse impact on the wellbeing of a student or student cohort and may impede their ability to complete their course. If this is the case, a student-focused response and ongoing management of the situation is required.

2.7. Review and Evaluation

Critical incident procedures will be regularly reviewed, including through external expert advice, to ensure best practice is embedded. After any critical incident, there will be a thorough evaluation of the effectiveness of APAC's response to, and management of the incident, and any deficiencies identified will be immediately rectified.

3. Procedure

3.1. The Emergency Management Group (EMG)

The Emergency Management Group (EMG), which is responsible for the response to, and continuing management of, critical incidents consist of:

- Chief Executive Officer (CEO)
- Director of Operations & Student Services (DOSS)
- Director of Higher Education (DoHE)
- A Head of Discipline (HoD) of the relevant discipline will be co-opted where necessary.

The Chair of the EMG is: Chief Executive Officer

The Deputy Chair of the EMG is: Director of Operations & Student Services

In the Chair's absence a Deputy Chair acts as the Chair. If both the Chair and Deputy Chairs are likely to be absent at the same time, the Chair will appoint an appropriate person to act as Chair, in the event that a critical incident arises.

All members of the EMG must have an accurate knowledge of this policy and procedure and of relevant mandatory reporting obligations.

3.2. Reporting of Critical Incidents

Students or staff who become aware of an incident, that may be considered a critical incident, report the incident to the APAC emergency contact on emergency phone number:

- CEO - **+61 435 535 643**
- DOSS - **+61 461 528 972**

Where an incident is reported to an individual other than mentioned in the point above, that individual should report the incident immediately to the APAC emergency contact.

The APAC emergency contact gathers all the available facts, including any witness details, and makes an initial assessment as to the seriousness of the incident.

If the APAC emergency contact assesses that the incident may be considered a potential critical incident, it is referred to the EMG Chair or Deputy Chair/s. Whoever responds to this referral becomes the Principal Contact (PC) for the critical incident.

Critical incidents will be reported to external authorities, such as the police, emergency services or health authorities, as required and in line with relevant legislatively mandated reporting requirements.

APAC will need to assess whether a material change notification to TEQSA is required. Notification is required if the critical incident poses a significant risk or threat to APAC's ability to comply with the HES Framework.

3.3. Responding to and Managing Critical Incidents

If the Principal Contact (PC) believes that the incident is of a degree of seriousness that it may be considered a potential critical incident, the PC convenes a meeting (which may be a teleconference or online meeting) of the EMG. The EMG evaluates the incident and determines if it should be responded to and managed as a critical incident.

If the EMG determines that the incident is a critical incident, then it:

- Assigns an appropriate member of the EMG, who may be the PC, to be the Critical Incident Manager (CIM) to oversee operational aspects of, and be the key contact for the response to and management of, the incident;
- Triggers any existing response and management plan developed for the type of incident that has occurred or, if there is no existing response and management plan, develops a plan of appropriate actions and interventions;
- Notifies the Chair of the Board of Directors, Chair of the Campus Management Committee (CMC) and Chair of the Finance, Audit and Risk Management (FARM) Committee of the critical incident;
- Triggers any existing communication plan developed for the type of incident that has occurred or, if there is no existing communications plan then develops and initiates such a plan;
- Determines what external advice, including legal advice, needs to be sought given the nature of the incident, and secures and considers that advice;
- Determines whether, depending on the seriousness of the critical incident the prudence of so doing, to advise all students that a critical incident has occurred and ensures, when students are advised, that there is provision for the counselling of students should it be required;
- Determines whether, depending on the seriousness of the critical incident and the prudence of so doing, to advise all staff that a critical incident has occurred and ensures, when staff are advised, that there is provision for the counselling of staff should it be required;
- Meets with the regularity required to maintain an effective response to, and effective management of, the critical incident;
- Determines which external organisations or individuals should be notified of the critical incident, including the police, relevant health authorities, the Department of Home Affairs, the Embassy or Consulate of the country of citizenship of any student involved. However, any communication with these organisations or individuals must not be initiated by the EMG until formal police notification processes are complete (if applicable).
- Determines the appropriate mechanism for supporting individuals involved in or affected by critical incidents, and initiates that support.

3.4. Action Plan Post-Incident

Following the critical incident, the CEO will assess the critical incident and implement a plan of action.

Where required, a meeting with appropriate staff/students/Board/Committee's will be organised. This meeting will determine issues and responsibilities relating to:

- Risk assessment and response actions;
- Emergency and other services;
- Students' relatives and other appropriate contacts;
- External entities;
- Counselling of students and staff;
- Media management;

Where appropriate APAC will provide support in the form of:

- Hiring interpreters;
- Making arrangements for hospital/funeral/memorial service/repatriation;
- Obtaining a death certificate;
- Assisting with personal items and affairs including insurance issues;
- Assisting with Visa issues.

3.5. Review of Critical Incident and Prevention

The EMG initiates a review of the response to, and management of, the critical incident in order to identify deficiencies in the procedure and related plans; actions undertaken, and interventions applied.

The EMG will provide reporting to and seek advice and guidance from the Chief Executive Officer, Finance, Audit and Risk Management (FARM) Committee and Campus Management Committee (CMC) for a post incident review (PIR).

External expert advice may be sought as a part of the review. Any identified deficiencies are remedied, and improvements secured for future critical incidents.

Critical Incidents will be captured in the Critical Incident Register. Incidents that require ongoing management or prevention measures will be captured in the Risk Register and managed as per the Business Continuity Policy and Procedure and the Risk Management Policy and Procedure.

As a part of APAC's Business Continuity Planning, training will be provided, encouraged, monitored and recorded via the Staff Professional Development Register. Training can include and will not be limited to First Aid training, Fire Warden Training, Health and Safety Training, Mental Health Training and scenario-based exercises.

3.6. Record Keeping

The PC is responsible for:

- Completing the Critical Incident Report and Workplace Health and Safety Incident Report form within 48 hours of the incident, and for maintaining adequate diary notes to support evidence included in the Critical Incident Report;
- Indicating in the Report whether a police report has been lodged or whether, in the reasonable opinion of the PC, a police report should be lodged;
- Establishing and maintaining a confidential file for the critical incident, which should include the Report itself, witness statements, witness contact details, relevant findings, police reports, relevant on-going information, details of the review and evaluation of the response and management plans;
- Ensuring that the file is stored in the relevant Institute records management system, with the requirement that it be maintained for at least two years after the cessation of enrolment of any students involved;
- Ensuring that any requirement external reporting relevant to the critical incident is completed.
- Completing the Critical Incident Register and notifying the Director of Operations & Student Services once completed.

4. Responsibilities

4.1. The Board of Directors

The Board of Directors will

- Ensure compliance with relevant legislation and regulatory requirements through the oversight of APAC activities and the development, monitoring and review of policies and practices and initiating prompt action where compliance is deemed to have lapsed;
- Monitor and oversee the assessment and management of risks, ensuring APAC is equipped with sufficient strategies to mitigate risks that may eventuate;
- Monitor and oversee formal complaints, allegations of misconduct, appeals processes for non-academic matters, breaches of academic or research integrity and critical incidents.

4.2. Academic Board

The Academic Board will exercise academic governance on behalf of the Board of Directors and provide advice to the EMG where needed with regards to the response, ongoing management and prevention of academic matters, breaches of academic or research integrity and critical incidents.

The Academic Board will provide advice and recommendations to the Board of Directors, Finance, Audit and Risk Management (FARM) Committee, and the Campus Management Committee where relevant.

4.3. Emergency Management Group (EMG)

The Emergency Management Group is responsible for;

- provide central coordination, operational support, monitoring and reporting of all critical incident business continuity management initiatives;
- prioritise EMG dealings over other business tasks until such a time that business may return to normal;
- assess information, potential impact and determine whether normal business operations can resume.
- reporting to FARM and the Board of Directors

4.4. Chief Executive Officer

The Chief Executive Officer (CEO) is responsible for overseeing the emergency procedures and the safety of APAC's higher education community in addition to executive accountability for APAC's business continuity capability.

4.5. Director of Operations & Student Services

The Director of Operations & Student Services (DOSS) will;

- assist and support the EMG and FARM (where required).
- oversee and manage the Critical Incident Register;
- facilitate training and exercises relating to critical incident response, business continuity and workplace health and safety;
- share relevant information on emergency management, critical incident, and business continuity management.

4.6. All Staff and Students

Safety and security responsibilities will be shared by all members of APAC's higher education community who will work together to ensure high standards are maintained on-campus.

5. Relevant Documents

- APAC Critical Incident Register
- APAC Critical Incident Report Form
- APAC Records Management Policy and Procedure
- APAC Sexual Assault and Sexual Harassment Policy and Procedure
- APAC Staff Professional Development Register

- APAC Student Handbook
- APAC Student Health, Safety and Wellbeing Policy and Procedure
- APAC Workplace Health and Safety Incident Report Form Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- TEQSA Guidance Note on Material Change Notifications
- The Privacy Act 1988 (Cth)

6. Definitions

- A **Critical Incident** is a tragic or traumatic event or situation, or the threat of such (within or outside Australia), affecting students or staff members, which has the potential to cause unusually strong emotional reactions within the community of students and staff.
 - Critical incidents include but are not limited to:
 - Missing students;
 - Severe verbal or psychological aggression;
 - Death, serious injury, or any threat thereof;
 - Acts of self-harm or drug incidents requiring medical attention;
 - Pandemics and other risks to public health;
 - Natural disaster;
 - Domestic violence, physical, sexual, or other abuse; and
 - Non-life-threatening events could still qualify as critical incident.

Version Control and Document Owner

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5.0	APAC	Changed the EMG members in item 3.1	7 December 2023	7 December 2023
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