

Critical Incident Policy

Document

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| Document Name | Critical Incident Policy |
| Brief Description | This policy outlines framework and guidelines for critical incident management at the Sydney Institute of Business and Technology (SIBT). |
| Responsibility | Senior Management Team |
| Initial Issue Date | 22 February 2010 |
| Date for Next Review: | 14 September 2025 |

Version Control

| Date/Approval | Version No. | Summary of Changes | Reviewer Name and Department/Office |
|----------------------|--------------------|---|--|
| 22/02/10 | 1 | New policy developed and implemented | Senior Management Team |
| 06/10/11 | 2 | Updated policy in line with UPD | Senior Management Team |
| 19/06/12 | 3 | Added statement - <i>SIBT may commence applicable disciplinary procedures if a person to whom this policy applies breaches this policy (or any of its related procedures).</i> | Senior Management Team |
| 03/04/14 | 4 | Complete review of document. Updated DIAC to DIBP. Changed title from SIBT Chief Warden to Building Warden and General Manager to Executive General Manager, Australia and New Zealand. | Senior Management Team |
| 23/01/15 | 5 | Adopted QIBT policy | Senior Management Team |
| 10/03/16 | 6 | Updated due to relocation to the Sydney City Campus. | Senior Management Team |
| 10/02/17 | 7 | Updated due to the relocation to Hyde Park and staff titles. | Senior Management Team |
| 19/01/18 | 8 | Updated to include Critical Management for U18 | Senior Management Team |
| 04/03/19 | 9 | Updated and reviewed | Senior Management Team |
| 20/03/19 | 10 | Updated and reviewed to reference the Navitas Policy Hub and to more clearly align with Navitas Crisis Management Program Policy and Framework | Senior Management Team |
| 14/9/2023 | 11 | Definitions updated and amended. Roles updated. Escalation hierarchy when assessing a critical incident table added. Merged with the Critical Incident Procedure. | Senior Management Team |

Related Documents

| Name | Location |
|---|---|
| Incident Report, within the Navitas Risk Management System Tickit | |
| SIBT Critical Incident Register | SIBT Website |
| Privacy by Design Project Policy | Policy Hub |
| Privacy Management Overview | Policy Hub |
| Data Breach Reporting and Management Procedure | Policy Hub |
| Student Code of Conduct | SIBT Website |
| Sexual Harassment Prevention and Response Policy | SIBT Website |
| Sexual Assault Prevention and Response Policy | SIBT Website |
| Mental Health and Wellbeing Response and Management Policy | SIBT Website |
| Discrimination, Harassment, Victimisation and Bullying Policy | SIBT Website |
| Group Risk Management Policy | Policy Hub |
| Group Risk Management Framework | Policy Hub |
| Higher Education Support Act 2003 | https://www.legislation.gov.au/ |
| Higher Education Standards Framework (Threshold Standards) 2021 | https://www.legislation.gov.au/ |
| Education Services for Overseas Students Act 2000 | https://www.legislation.gov.au/ |
| National Code of Practice for Providers of Education and Training to Overseas Students 2018 | https://www.legislation.gov.au/ |
| Health and Safety Act 2011 | https://www.legislation.gov.au/ |
| Work Health and Safety Regulation 2017 | https://legislation.nsw.gov.au/ |



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1. Purpose

- a) The purpose of the Critical Incident Policy is to assist staff and students to respond promptly, effectively, and appropriately to incidents that are likely to cause loss of life, injury, trauma, damage, or disruption to individuals and/or affect the SIBT community as a whole.

2. Definitions

| Term | Meaning |
|---|--|
| Critical Incident | An incident that is a sudden, unexpected, and traumatic event or threat outside the normal range of experience of the community affected but having the potential to cause death, injury, severe emotional stress or distress, destruction, loss of property, shut down or disruption of business operations. |
| Critical Incident Management (CIM) | The organisational plan designed to minimise risk and maintain the safety of persons in or about the campus from both proactive and reactive perspectives. Critical Incident Management also involves addressing matters relevant to maintaining essential business continuity during times of actual or potential disruption. This could be the result of incidents or events including but not limited to crime, negligence, violence, severe weather, utility interruptions or telecommunications failures. |
| Critical Incident Team (CIT) | <p>The SIBT Critical Incident Team will be responsible for planning and leading a timely and effective response to a critical incident. The membership of the Critical Incident Team will be determined for each critical incident to ensure relevant staff members are involved.</p> <p>In the event that a critical incident could be deemed a crisis, the College Principal and Director will escalate to the Executive General Manager (EGM) and divisional CEO, who will determine whether a Regional Critical Incident Response Team and a Group Crisis Management Team need to be put in place to support the SIBT's CIT.</p> |
| Bystander | A person who is present and observes the incident but does not take part. |
| First Responder | A person who provides first support and is confided in by another person who has experienced or is currently experiencing adverse effects of an incident. |

3. Application

- a) The Critical Incident Policy applies to all SIBT students, staff, partners, and visitors and refers to incidents that may occur while engaging with SIBT, either on the campus or as part of an organised business or social off-campus event (including outside of Australia).

4. Policy Statement

- a) SIBT understands that:
 - i. Critical incidents can have a wide reaching and sometimes devastating effect on an individual, group of people or the business;
 - ii. Every critical incident is unique and needs to be dealt with appropriately, according to the needs of the people affected.
- b) Examples of critical incidents are not limited to, but could include:
 - i. A data breach;
 - ii. Missing students;
 - iii. Severe verbal or psychological aggression;
 - iv. Death, serious injury or any threat of these;
 - v. Natural disasters; and
 - vi. Issues such as domestic violence, physical abuse, sexual assault, sexual harassment, drug or alcohol abuse;
 - vii. Other non-life threatening events including those that may involve police, emergency services and/or hospitalisation.
 - viii. For under 18 students, the term “critical incident” can also include, but is not limited to:
 - Disruption in the under 18 years of age student’s welfare arrangement;
 - Inability to contact the under 18 years of age student.
- c) To ensure safety of its working and learning environment, SIBT is committed to:
 - i. Taking a pro-active approach to the welfare of the campus community; and
 - ii. Providing ongoing and systematic welfare support for general concerns, with specific initiatives in place around the prevention of sexual assault and harassment; and
 - iii. Regularly practising and reviewing emergency and evacuation procedures; and
 - iv. Recording all incidents and conducting post-incident evaluation; and
 - v. Organising appropriate and regular staff development and training.

5. Responsibilities

- a) The College Principal and Director will determine whether an incident is a critical incident as per the definition in this policy and put into operation provisions of this policy or refer to another policy as relevant. E.g., Sexual Harassment Prevention and Response Policy, Sexual Assault Prevention and Response Policy, Mental Health and Wellbeing Response and Management Policy, Discrimination, Harassment, Victimisation and Bullying Policy.
- b) If an incident is determined to be a critical incident, the College Principal and Director will assemble a Critical Incident Team (CIT).
- c) The SIBT Critical Incident Team (CIT) is responsible for planning and ensuring the implementation of a timely and effective response to a critical incident. The team will vary depending on the nature of the critical incident and may include but is not limited to the following staff members:
 - i. College Principal and Director;
 - ii. Academic Director;
 - iii. Director of Marketing and Admissions;
 - iv. Director of Student and Academic Services;
 - v. Student and Academic Services Manager;

- vi. Student Learning and Welfare Support Manager;
 - vii. Student Counsellor;
 - viii. Quality and Compliance Manager;
 - ix. Admissions Manager.
- d) The Critical Incident Team may involve additional staff members as appropriate to a particular incident. This may include staff from Navitas such as legal advisors or communications experts. Appropriate and up-to-date staff contacts are included in section 12.
- e) As a result of the incident, other bodies may need to be contacted, such as Emergency Services or Government departments.
- f) Escalation hierarchy when assessing a critical incident is set out in the table below.

| Level of Risk: | Responsibilities: | Examples: |
|----------------|--|--|
| Severe | Navitas UPA CEO, Navitas UPA EGM, College Director and Principal Partner University (relevant key stakeholder) | Death, suicide, life-threatening injury, deprivation of liberty, threats of violence, assault, rape/sexual assault, burglary, use of firearms, threat of wide-spread infection and or contamination, fire, bomb, explosion, gas/chemical hazard, pandemic. |
| Significant | College Director and Principal | Severe Health and Safety Risk, serious injury incurred by either staff or student, evacuation of building is necessary, missing student, incident involving U18 student. |
| Moderate | Director, First Aid Officer, WHS Committee member | Suspicious package unattended, Health and Safety Risk, illness of staff or student |

6. Critical Incident Phases

- a) The staff member/or student (first responder) should assess the situation and consider any apparent risks to their own safety. In case of an emergency call 000 immediately.
- b) Where the first responder considers a critical incident to be apparent or likely, when feasible, they must alert the most senior available staff member of SIBT.
- c) Where the first responder is unsure if the incident is considered critical, they must refer it to their manager or the next senior staff member available at SIBT.
- d) Provided there is no threat to personal safety in doing so, the first responder should take steps to minimise further damage or injury to persons or property. This may involve organising willing bystanders to provide support. Where the incident occurs on campus, campus security staff should be alerted immediately by the first responder or a responsible delegate at the scene. Campus security staff will contact emergency services immediately, if required, and the campus community will then be guided by their advice.
- e) In case of a critical incident the College Principal and Director should be notified as soon as possible if not onsite. The College Principal and Director (or delegate) will also notify the Navitas EGM and CEO for the Australasia region if required.
- f) If the critical incident is not identified as an emergency, the College Principal and Director (or delegate) will assemble the Critical Incident Team (CIT) to determine an appropriate course of action.

- g) If a critical incident is identified as a potential crisis, the College Principal and Director (or delegate) must also escalate to the Navitas EGM and CEO for the Australasia region, who will convene a Regional Critical Incident Response Team or a Group Crisis Management Team as appropriate to support the College.
- h) If the critical incident is identified as a data breach, the critical incident team will refer to the Navitas Data Breach Reporting Procedure.
- i) The Critical Incident Team will:
 - i. Seek a clear understanding of the incident and its current status;
 - ii. Confirm the identity of the people involved;
 - iii. If the incident involves a student, obtain detailed student information including ID number, local address, next of kin, nationality, religion, known medical conditions and if an international student, the OSHC provider and the sponsor/agent;
 - iv. Determine to what extent information can be provided under the Privacy Policy to any relevant external parties;
 - v. Discuss and plan an immediate response and ongoing support strategy, identifying key staff responsible for implementation;
 - vi. Determine an appropriate communication strategy, including the key stakeholders, communication channels and contact point/s;
 - vii. Record the incident and the actions taken.
- j) The response may include some or all of the following steps:
 - i. Liaising with the Police regarding notification to the family of the student or staff member;
 - ii. Ensuring the next of kin are informed and updated on the current situation;
 - iii. If an international student:
 - Organising interpreter services for families of non-English speaking background;
 - Contacting the OSHC provider and connecting them with the family or student (if appropriate);
 - Contacting the relevant Consulate if required;
 - iv. Ensuring appropriate assistance and support for the family and colleagues or fellow students;
 - v. Organising appropriate counselling and debriefing sessions for individuals or student and staff groups or facilitating referral to an external provider as required;
 - vi. Organising appropriate spiritual or religious support;
 - vii. Assisting students to connect with legal advisors.

7. Under 18 Students Critical Incident

- a) When an emergency situation has arisen with regards to a student who is under 18 years of age, for example that the welfare arrangements have been disrupted, SIBT will immediately convene Critical Incident Team.
- b) The Critical Incident Team will assess the emergency welfare arrangements and attempt to contact the student and if the student is contactable, SIBT will provide appropriate support, ensuring the college's welfare and counselling team are included.
- c) If SIBT is unable to contact the student and has concerns for the student's welfare, SIBT will make all reasonable efforts to locate the student, including notifying the



emergency contacts of the student, police and any other relevant Commonwealth, State Agencies as soon as practicable.

8. Post-incident Evaluation

- a) The Critical Incident Team will meet within one (1) month after the critical incident has reached a conclusion to evaluate the implementation of procedures and responses and suggest improvement activities if necessary.
- b) Additional staff training will be scheduled as required.

9. Record Keeping

- a) The Quality and Compliance Manager will:
 - i. Act as scribe for all meetings to keep records of content and decisions;
 - ii. Complete the Incident Report on the Navitas "Tickit" Critical Incident Register and the SIBT Critical Incident Register with details of the event. These are maintained on SIBT's shared drive, in addition to all communication issued in relation to the incident;
 - iii. Complete and file all documentation together with the Critical Incident Register on the College's shared drive.
 - iv. Keep a record of all communication issued in relation to the incident.

10. Reporting

- a) A report is to be tabled at the following SIBT Senior Management Team meeting outlining the type of incident and follow-up action required once the incident is resolved, evaluated and signed off by the College Director and Principal.
- b) A summary of all incidents will be provided to the Academic Board annually or as necessary.
- c) Actions arising from incidents (improvements to processes) must be addressed and monitored through the Senior Management Team.

11. Privacy

- d) Under the Navitas Privacy Policy, individuals have a right to the protection of their private and personal information held by organisations. In the event of a critical incident where the need for the disclosure of private information arises, SIBT will do so in accordance with legal requirements.
- e) SIBT may exercise its discretion and disclose information as necessary to reduce the impact of an imminent threat to life or health of a student or of another person.

12. Critical Incident Contacts

| Emergency Contacts | Contact |
|-----------------------------|---------------------------------|
| Police, Fire, Ambulance | 000 |
| Student next-of-kin details | SIBT Student Management Systems |

| Emergency Contacts | Contact |
|--|--|
| Navitas Security | 9964 6113 or Extension 70113 or 0431 442 006 |
| State Emergency Service | 132 500 |
| NSW Poisons Information Centre | 13 11 26 |
| Immediate phone-based interpreting service via Department of Homes Affairs Translating and Interpreting Service (TIS National) | 13 14 50 |

| Local Hospitals (the first three are the closest to the SIBT campus) | Contact |
|---|-----------------------------|
| Sydney Hospital and Sydney Eye Hospital 8 Macquarie Street Sydney | 9382 7111 |
| St. Vincent's Hospital 390 Victoria Street Darlinghurst | 02 8382 1111 |
| Royal Prince Alfred Hospital 50 Missenden Road Camperdown | 9515 6111 |
| Prince of Wales Hospital 320-346 Barker Street Randwick | 9382 2222 |
| Royal Northshore Hospital Reserve Road St Leonards NSW | 9926 7111 |
| Health Direct – 24-hour health advice line | 1800 022 222 |
| National Sexual Assault, Domestic Family Violence Counselling Service | 1800 RESPECT (1800 737 732) |

| Mental Health Support Services | Contact |
|------------------------------------|---|
| SIBT Counsellor | https://calendly.com/student-services-teams studentservices@sibt.nsw.edu.au |
| NSW Mental Health Line | 1800 011 511 |
| Mensline Australia | 1300 789 978 |
| Beyond Blue | 1300 224 636 |
| Women's Information Line | 1800 817 227 |
| QLife (LGBTIQ + SUPPORT) Australia | 1800 184 527 |
| Funeral Advice Line | 1300 306 670 |
| Road Trauma Support Team | 1300 367 797 |
| Lifeline | 131 114 |
| Salvation Army Care Line | 1300 36 3622 |

| Navitas | Contact |
|---------|-----------------------------|
| UPA CEO | malcolm.baigent@navitas.com |

| Navitas | Contact |
|--------------------------------------|--|
| Communications support | communications@navitas.com |
| Legal support – Senior Legal Counsel | Matthew.rumpus@navitas.com |

| Other Useful Contacts | Contact |
|--|---|
| Department of Home Affairs | 131 881 https://immi.homeaffairs.gov.au/ |
| WorkCover NSW | 13 10 50 |
| Allianz – Provides overseas student health cover | 1800 814 781 |