



IHM[®]
Institute of Health and Management

Critical Incident Response Policy and Procedure

1. Purpose

This Policy and Procedure 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 institute:

- meets its duty of care obligations to provide a safe environment and to have in place the highest possible standards of health and safety for Staff and Students and other persons working at or visiting the Institute;
- is able to respond swiftly and effectively in the event of a Critical Incident, disaster or crisis;
- is compliant with relevant Legislation and Standards.

In the event of a Critical Incident, staff and students should follow this procedure and also exercise common sense ensuring that the welfare and safety of all concerned are given priority.

2. Definitions

Critical Incident: is a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury (as defined by Standard 6 of the National Code 2018).

Critical incidents include, but are not limited to, situations such as:

- a natural disaster, fire, earthquake or storm; bomb threat or sabotage, explosion, hostage or siege situation;
- loss of a building or key utilities, telecommunications failure; bodily harm, serious accident or injury; serious assault, robbery, armed hold-up;
- serious health or environmental issue, a pandemic, an epidemic or an outbreak;
- serious sexual assault, serious drug use and/or alcohol abuse;
- war or acts of terrorism, civil unrest, major demonstration; major or severe incidents that involve students or staff; serious injury, illness, or death of a student or staff; mental health issues impacting on safety of self or others;
- severe verbal or psychological aggression; other traumatic events or threats;
- a missing student(s).

Critical Incident Response Team (CIRT): facilitates interventions following a Critical Incident. Members of the CIRT include the CIRT Leader, Emergency Warden, CEO, COO, Quality Assurance Manager, OHS Representative, First Aid Officer and other relevant staff members.

Sexual Harassment: IHM has a zero tolerance approach to sexual assault and sexual harassment and other forms of harmful misconduct. Sexual harassment is when a person makes an unwelcome sexual advance, or an unwelcome request for sexual favours to another person, and/or engages in any other unwelcome conduct of a sexual nature in relation to another person. Examples of sexual harassment:

- Intrusive questions or statements about a person's private life
- Repeatedly asking a person for sex or dates
- Offensive sexual comments or jokes
- Sexually suggestive behaviour such as leering or staring.

Sexual Assault: Sexual assault occurs when a person is forced, coerced or tricked into sexual acts against their will or without their consent. The act is often perpetrated by someone known to the person and can leave them feeling threatened, uncomfortable or frightened. Sexual assault is a crime and is not the victim's fault. Examples of sexual assault:

- comments about a person's private life or the way they look
- sexually suggestive behaviour, such as leering or staring
- brushing up against someone, touching, fondling or hugging
- sexually suggestive comments or jokes
- displaying offensive screen savers, photos, calendars or objects
- repeated requests to go out
- requests for sex
- sexually explicit emails, text messages or posts on social networking sites.
- sexual assault.

Consent must be given and it should be informed and free from intimidation. A person who is asleep or under the influence of drugs or alcohol cannot give informed consent.

3. Principles

Duty of care: 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. 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. In the case of overseas students, the duty of care extends beyond activities directly related to study. IHM has specific responsibilities to the overall well-being of all students.

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

Timely and responsive communication: 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.

4. Responsibility

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. Where the Critical Incident involves a threat to the institute as a whole, the Campus Manager/Deputy Campus Manager on each campus should be notified immediately. The Campus Manager/ Deputy Campus Manager has the overall responsibility to ensure the effective implementation of this policy and procedure.

5. Reporting a Critical Incident to Emergency Services

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

6. Contact numbers for IHM campuses

The Campus Manager/ Deputy Campus Manager can be contacted on the following numbers. The Campus Manager/ Deputy Campus Manager will attend the incident, provide a report to Emergency Services regarding the same.

Campus / Office Location	Address	Contact Number (24/7)
Head Office And Online Learning Centre	Level 1, 76 – 80 Turnham Avenue, Rosanna, Victoria 3084, Australia	1800 225 283
Melbourne CBD Campus	Level 5, 131 Queen Street, Melbourne, VIC 3000, Australia	+61401212720
North Melbourne Campus	203/ 187, Boundary Rd, North Melbourne, VIC 3051, Australia	+61401212720
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

7. Procedure

The Campus Manager / Deputy Campus Manager/CIRT Team will have immediate responsibility for responding to an incident and controlling the situation at the location and liaising with Security and Emergency Services.

Critical Incident Response Team (CIRT)

The Critical Incident Response Team (CIRT) convenes as soon as possible after an emergency or critical incident has been reported or has occurred, to coordinate IHM's response.

The CIRT will also following an incident make recommendations for preventative measures to the EMC (Executive Management Committee) for implementation. The institutional process for managing a critical incident or event that has been reported to staff involves the following steps:

Step 1: Determine and Notify Response Manager (CIRT Leader)

Step 2: Initial Assessment and Action

Step 3: Plan Strategy and Interventions

Step 4: Communication to all concerned

Step 5: Reporting and referral for management under other IHM policies and follow up and evaluate.

Non-emergency Critical Incident

Non-emergency critical incident response procedures are employed when a critical incident occurs which is not an emergency and for which a specific response procedure has not been designated.

Step 1: A critical incident is identified by or brought to the attention of an IHM employee;

Step 2: The IHM employee notifies the CIRT Leader;

Step 3: The CIRT Leader coordinates the immediate response, including utilising the expertise of other staff. The directions of the CIRT Leader are given priority over other work;

Step 4: The CIRT Leader invites members of the CIRT to a meeting as soon as is practicable following the critical incident;

Step 5: The CIRT members meet and deliberate upon the short, medium- and long-term responses to the critical incident;

Step 6: The CIRT members take direct action and direct other employees to implement short term responses and;

Step 7: The CEO compiles a report to the governing bodies regarding the incident, the response and recommendations for changes to prevent repetition of the incident.

Missing overseas student

The following procedure shall be followed by IHM in the event a student is missing.

1. The Course Coordinator identifies the student as having not attended classes for five consecutive days and unable to make contact with the student by telephone;
2. Course Coordinator informs the CIRT Leader;
3. CIRT Leader makes additional attempts to contact the student;
4. Asking the student's lecturers if they have had contact from the student;
5. Contacting the Student Administration and Registration Services Manager to check if the student has made any attempt to vary their enrolment;
6. Attempting to contact the student's designated emergency contact person and;
7. Visiting the student's designated home address.
8. If the student remains missing, the CIRT leader will allow an additional one business day from the date the student was identified as missing, then inform the police, and if appropriate, the consulate/embassy representing the student's country of origin;
9. If the student remains missing for a further five business days, the CIRT leader will contact the Department of Home Affairs and the Department of Education, Skills and Employment and seek further advice;
10. The procedure for reporting attendance is set out in the Attendance Policy and Procedures for Overseas Students;
11. Once the student has been either located or reported, the CIRT leader calls a meeting of the CIRT. CIRT members discuss the incident and a report is compiled and tabled at the next scheduled meeting of each relevant governing body. If the student has been found, they may be invited to attend the meeting and discuss their experience.

Death of a student

Should IHM, or an employee of IHM be informed that an overseas student has died; the following procedure will be followed:

1. The employee informs the CIRT leader;
2. The CIRT leader contacts the police, coroner or hospital to verify that the death has occurred and that the identity of the deceased has been established;
3. The CIRT leader informs the student's course coordinator and any staff working closely with the deceased overseas student;
4. The CEO informs their family or next of kin and liaises with any relevant government departments;
5. The CIRT leader informs the Student Administration and Registration Services Manager, who updates the student's record to 'deceased' and reports the change using PRISMS and;
6. Members of the CIRT meet as soon as soon as possible, to determine measures such as funeral arrangements and grief counselling for staff, classmates and the student's family.

Evacuation

An evacuation will commence:

1. If the building alarm sounds the evacuation tone, which is not preceded by a drill notification;
2. If the Emergency Warden makes a decision to evacuate ;

Should an evacuation be required, it shall be conducted in accordance with the following procedure:

1. The Emergency Warden evaluates the possible exits and determines which is the safest, taking into account the location of any threat or hazard. In doing this the Emergency Warden may seek information from emergency services, other Emergency Wardens or the building's emergency control panel;
2. All staff, students, and visitors - present (evacuees) must follow the instructions of the Emergency Warden;
3. The Emergency Warden checks each room for people who have not begun to evacuate, if it is safe to do so. If a person refuses to evacuate, the Emergency Warden briefly informs them of the dangers of remaining, then continues to evacuate all other evacuees;
4. The Emergency Warden escorts the evacuees to one of the designated meeting points or, if a hazard affects those meeting points, to another safe location;
5. The Emergency Warden counts the evacuees and subtracts their number from the total number of people known to be in attendance, then informs emergency services of the number of people estimated to still be in the building;
6. The emergency warden and evacuees do not return to the building until the Emergency Warden has been informed by emergency services that it is safe to do so.

Fire Response

The first person to become aware of a fire will:

- Call 000 and inform the fire brigade;
- Alert the emergency warden, or alert a staff member who will alert the emergency warden;
- The emergency warden will:
 - use firefighting equipment to extinguish the fire if it is safe to do so;
 - initiate the evacuation procedure.

Spill Response

- A spill is detected by or reported to an IHM employee;
- The employee notifies both the emergency services and the Emergency Warden who warns any colleagues considering entering the area affected by the spill until the Emergency Warden is able to assist;
- The Emergency Warden liaises with emergency services and may initiate the evacuation procedure if necessary.

Flood Response

The first person to become aware of a flood will:

- alert the Emergency Warden, or alert a staff member who will alert the Emergency Warden;
- the Emergency Warden will:
 - seek advice from emergency services;
 - direct staff and other people in attendance in accordance with the instructions from emergency services.

Pandemic Response

During a pandemic, all IHM students and staff comply to State and national government directions, including regulatory advice from TEQSA, to ensure the safety of all concerned. IHM will:

- Ensure students have access to resources to engage in online learning and any barriers to accessing technology.
- Students are offered alternative course arrangements, where there is a significant change or disruption to delivery of courses, including processes for fee reduction, refunds or deferral.
- Ensure student engagement is maintained online, including peer-to-peer interaction, staff to student interaction and student support, to mitigate risks associated with social isolation.
- Ensure staff are appropriately supported and trained accordingly to meet a pandemic response.
- Ensure quality assurance mechanisms are in place for the changed mode of delivery, including how to review, measure and improve mechanisms.
- Ensuring exams and assessments are fit for purpose and process are in place to maintain academic integrity of assessments, including proctoring/supervision of exams and tests.
- Ensure how professional accreditation will be maintained.
- Ensuring appropriate, accurate records are kept and recorded, including student files.
- Seek regular student feedback during the period of disruption to inform continuous improvement of the student experience.
- Oversight of key risks to IHM's operations in an online delivery context, including risks to academic integrity are monitored, reported and acted upon.

Violent Behaviour Response

If an IHM employee witnesses or has brought to their attention an incident involving violent behaviour they will:

- report the violent behaviour to the emergency services (000) as soon as this can be done safely;
- notify the Emergency Warden as soon as it is safe to do so and the Emergency Warden implements, or directs staff to implement, any short term measures to ensure safety;
- notify the CIRT leader as soon as the immediate danger has passed and the CERT leader implements interim security measures, then calls a meeting of CIRT members to discuss the incident and any necessary changes to security arrangements;

The details of the incident and the CIRT's recommendations are tabled at the next scheduled meeting of the relevant committees and governing bodies.

Bomb Threat Response

If communication regarding the presence of a bomb (i.e. a bomb threat) is received by telephone, voice messaging or any other form of synchronous communication by an IHM staff member, that staff member will:

- press the 'call trace' button, if using a telephone equipped with one;
- communicate to other staff members that a bomb threat is being received in a manner that does not alert the person making the bomb threat that such communication is taking place. This may be done by email, text message, by passing a written note or by opening a bomb threat response pack (located near each fixed line telephone in all IHM facilities) and holding up the red paper hand contained within;
- leave the phone off the hook or the relevant computer or device dialogue open once the person making the bomb threat discontinues communication or ends the call.

As soon as a staff member becomes aware that their colleague is receiving a bomb threat call they will:

- immediately dial 000 and inform the emergency services;
- inform the Emergency Warden, who will make a decision as to whether to initiate the evacuation procedure;
- keep contact with the emergency services and pass on any information obtained by the person taking the bomb threat call.

The Emergency Warden will:

- put on the yellow emergency warden hat;
- make a decision as to whether to evacuate;
- instruct all people in attendance as to how to proceed.

Sexual Harassment or Assault

Instances of sexual misconduct reported to IHM will be handled in a sensitive, discrete and impartial manner. Counselling support services will be offered throughout this process. Even if students or staff members do not wish to make a report they may still access support services at any time.

IHM has a legal obligation to contact the police on behalf of all minors (under 18 years of age) who report experiencing a sexual assault. Legal adults (18 years and over) may make their own choice in regards to police involvement, except when evidence brought forward indicates that the broader safety of the community could be in jeopardy. Such instances evoke IHM's Duty of Care and we reserve the right to take the case forward to the Police.

The Police Service provides an efficient, effective and professional service to the survivors of sexual misconduct. If students or staff members are thinking of reporting to the police it may help them to know that:

- it is their choice to decide whether they wish to proceed with a formal complaint. No pressure will be placed on them to do so and they will be provided with information to assist in making an informed decision;
- the police will first assess their immediate safety, medical and psychological needs;

- the police will then take a detailed statement. This is one of the most important steps in the investigation process and it may take a number of hours to complete. This process will result in a hard copy statement being compiled for the person concerned to sign under oath. This statement will be used in any court proceeding that may occur;
- if an assault has recently occurred and students or staff members have presented at a police station for help, they are requested not to shower or bathe, wash or destroy the clothing they wore during the assault, and not to disturb the physical environment where the assault occurred;
- it may be a good idea to take a change of clothes and shoes to the police station as some items they are wearing may be required as evidence;
- even if some time has passed or an incident happened a long time ago, it is still worth reporting it to the police.

If an IHM employee is informed about sexual assault that has occurred at a campus, the following procedure will be followed:

- Dial triple zero (000): Dial triple zero (000) for emergency services (fire/ambulance/police). Calling the police is the quickest way to get help in an emergency. To speak to Police about an incident of sexual harassment or assault, dial triple zero (000) or contact the Police Assistance Line on 131 444.
- Call the Campus Manager: Notify Campus Manager / Deputy Campus Manager. The Campus Manager/ Deputy Campus Manager are available 24 hours a day to assist with an emergency or safety threat.

8. Post Incident measures

Post Incident Counselling Services

If students or staff members are at risk or suffering from difficulties such as (though not limited to) anxiety, depression due to a critical incident, or if the student or staff request specialised help as a result of a critical incident, IHM will organise support in the following ways:

- 24/7 telephone line – this telephone line is managed by senior staff members of IHM, who will be able to organise any emergency support required by IHM students and staff or visitors;
- 1800 number access – this is IHM’s general enquiry line. Students or staff requesting assistance will be connected directly to the IHM HR Manager who assist the caller in the first instance;
- Group debriefing – IHM will organise support staff to explore and understand a range of issues, including:
 - The sequence of events
 - The causes and consequences
 - Each person’s experience
 - Any memories triggered by the incident
 - Normal psychological reactions to critical incidents
 - Methods to manage emotional responses resulting from a critical incident;

- Psychological counselling/ Grief/trauma counselling - It is also common for critical incidents to bring up a range of personal issues for staff and students. In such circumstances, IHM will refer the student or staff member to an appropriate trauma/ grief counselling service for support.

Critical Incident Report

Where a Critical Incident has occurred the Registrar shall within 5 days, ensure that the following steps are taken in completing a written Critical Incident Report to IHM Management. The 'critical incident report' is to contain as much information as possible and the report has to identify the people directly involved in the incident.

The registrar should:

- request a written report from staff who were directly involved in the incident or present when it occurred
- identify and interview students who may have been involved or present during the Critical incident
- identify any emergency service contacts utilised during the critical incident
- list pastoral or external support personnel or services that were involved during the critical incident.

Management Review

Following the receipt of a Critical Incident report the CEO and IHM management will review the report at the next management meeting and investigate any:

- common threads relating to the compliance and quality assurance.
- repeat issues
- any general adverse trend that needs correction.

Any improvement items will be recorded in the CI register and implemented as soon as possible.

Public Relations/ Media Release

Where the circumstances of a critical incident involving students or staff is considered to have some public relations implication the CEO is the only authorised spokesperson to speak to media representatives and to provide a media release on behalf of IHM.

9. Records management

In the event that a critical incident occurs, the incident will be reported using the Critical Incident Report form which is available on IHM's Student Portal and IHM's Staff Hub. Each form will be recorded in the Critical Incident Reporting Register noting the following key details

- the time of the incident
- the location and nature of the incident
- the names and roles of persons directly involved in the critical incident
- the action taken by the institute, including any opportunities for improvement
- the organisations and people contacted by the Institute.

IHM will retain all Critical Incident reports and records relating to a Critical Incident online for a period of two (2) years in a password protected and secure data library. Records specifically relating to Counselling are to be kept in IHM's enterprise resource management system – the Knowledge Hub, separate to the Critical Incident reporting, and must remain private and confidential.

10. Supplementary Information

Related policies/procedures/registers/forms:

- Student Support and Advocacy Services Policy and Procedure
- Health and Safety Policy, Procedure and Guidelines for Students
- IHM Risk Register
- Critical Incident Reporting Register
- Critical Incident Report form
- CIRT contact list

Benchmarking: University of Notre Dame, University of Sunshine Coast, Griffith University, University of Wollongong

Related Legislation: National Code of Practice for Providers of Education and Training to Overseas Students 2018, Crimes Legislation Amendment, WHS Act 2011 and OHS Act 2004.

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