

## SGA Critical Incidents Involving Students Policy and Procedure

### 1. Policy Statement and Purpose

SGA recognises the duty of care owed to its students and staff and visitors. This policy and procedure supports staff, students and visitors in responding to and managing critical incidents that involve SGA students. The policy and procedure acknowledges the need for clear decision-making and processes for managing and reporting on student critical incidents to ensure that each case is managed effectively, consistently, compassionately, and expeditiously.

### 2. Scope

This policy and procedure applies across SGA:

- to any category of individual or group of enrolled students (e.g. non-award, ELICOS, Foundation Program<sup>1</sup>, higher education, domestic and international) studying a course that is delivered and awarded by a SGA College listed in the footer:
  - in the four weeks prior to the commencement of their first term or semester of study;
  - during the period of their enrolment in their SGA course; and
  - in the four weeks following the end of their final term or semester of study or up until the student commences studies in their degree, diploma or other course at their SGA university pathway provider whichever is the shorter.

and

- where the critical incident involving the student(s) occurs on campus, or during an approved College activity (including field trip, excursions, placements, internships, study tours, etc.) and for international students regardless of whether, at the time of the incident, the student is engaged in an approved or non-approved SGA course/program related activity and on or off campus.

#### *Exclusions*

The policy does not cover critical incidents involving students enrolled in a university course that is being delivered by the SGA College on behalf of the university as the university's comparable policy applies.

### 3. Definitions

In the context of this policy the following definitions apply:

**Academic Director** means the most senior academic staff member for the course/program. May also be referred to as Director Academic Programs, Dean, Deputy Principal, or Program Manager.

**Critical incident** means a traumatic event, or the threat of a traumatic event, (within or outside Australia) that causes extreme stress, fear or injury to one or more students, such as significant disruption to the study routine, an emergency management situation, loss of a sense of control, or threat to the safety of students and staff. It may be sudden or protracted, extremely dangerous,

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<sup>1</sup> References to Foundation courses herein apply only to Foundation courses delivered and awarded by SGA's Taylors College (Perth campus), Flinders International Student Centre, and ANU College (CRICOS Provider Code 01682E). They do not apply to the University of Sydney Foundation Program (CRICOS Course Code: 022310D) delivered by SGA's Taylors College (Sydney campus) on behalf of the University of Sydney (CRICOS Provider code 00026A).

involve police or emergency services personnel, and generally be outside the normal range of experience or expectation of the people affected.

It is an event that does not impact a campus' people, operations or the environment in a significant way so is not treated as an event under the College's Business Recovery Plan (BRP). A critical incident involving students is more likely to affect only an individual or a small number of people. The incident may have just occurred or may have occurred in the past but is considered serious enough to require prompt intervention.

It is an event that causes the student(s) to experience a strong emotional reaction that interferes with their usual coping skills. The event has a level of trauma that is beyond the normal living experiences of those affected. The resulting stress reaction may include emotional, physical, behavioural and cognitive changes evident either at the time of the incident or later.

The impact of a critical incident involving an individual or a small number of students may affect any member of the College community, not only those most directly involved.

Some types and examples of critical incidents involving a student or group of students include:

Critical Incident Type	Example
Personal	<ul style="list-style-type: none"> <li>• serious injury, unexpected and sudden or accidental death, murder or suicide of a student, or staff member or a visitor to the college involving a student</li> <li>• attempted suicide or self-harm</li> <li>• life threatening injury/illness</li> <li>• sexual harassment or sexual assault</li> <li>• missing student/s (24 hours for Under 18 years of age) (for student 18 years of age and over consistent with missing student notification requirements set out in College student course attendance and progression policy and procedures)</li> <li>• hostage situation/kidnapping/terrorism</li> <li>• domestic violence</li> <li>• severe physical aggression or physical assault</li> <li>• severe verbal/psychological aggression or racial abuse</li> <li>• child protection matter</li> <li>• electric shock or other form of shock</li> <li>• violence or threats of harm or violence, including robbery</li> <li>• dangerous or threatening person(s)</li> <li>• public transport or road traffic accident</li> </ul>
Medical requiring hospitalisation	<ul style="list-style-type: none"> <li>• accidents requiring professional medical intervention/hospitalisation (e.g., burns/scalds, injury)</li> <li>• medical emergencies (e.g. severe asthma, severe allergic reaction, poisoning, drug/ alcohol intoxication or overdose, epi-pen use, resuscitation unit use)</li> <li>• mental health crisis</li> <li>• student hospitalisation</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Any critical incident affecting international students on or off campus</li> <li>• Any critical incident involving a student if scale not sufficient to be considered an emergency under College Business Recovery Plan, including in relation to:               <ul style="list-style-type: none"> <li>▪ infectious/pandemic disease outbreak</li> <li>▪ chemical, radiation or bio-hazard spillage</li> <li>▪ bomb threat</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>▪ building collapse or damage</li> <li>▪ fire, explosion, gas leak incidents charged with extreme emotion</li> <li>▪ incidents involving siege, hostage, firearms, weapons or bombs</li> <li>▪ motor vehicle impact with building, or</li> <li>▪ natural disaster (within or outside Australia, for example a student affected by a natural disaster occurring off campus is not an emergency under the Business Recovery Plan).</li> </ul> <p>Non-life threatening events could still qualify as critical incidents.</p>
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**Critical Incident Response Coordinating Group (CIRC Group)** is the team of staff mobilised by the College to assess and respond to a critical incident that has occurred. A CIRC Group is established with each critical incident which is defined within this policy and procedure and its composition will depend on the type of incident requiring action.

**Domestic student** means a student who is enrolled in a unit of study at a SGA college who is an Australian citizen (including Australian citizens with dual citizenship), or a student who is a New Zealand citizen or a student who has Permanent Resident Status.

**Head of College** for SGA International Study Centres (ISCs) means the most senior staff member for the College (or their delegate). May also be referred to as Centre Director, Principal, or Campus Director.

**Head of International Study Centres (Head of ISCs)** means the senior leader accountable for the effective management of SGA's International Study Centres (ISCs). Each Head of College reports to the Head of ISCs.

**Incident** is an event or issue that requires a response. An incident may impact on any area of College activity. A non-critical incident has a localised containable impact and is unlikely to escalate in severity to require management in accordance with this policy and procedure but requires response and management as part of ongoing business-as-usual. A critical incident involving an individual student or group of students must be managed in accordance with this policy and procedure.

**International student** means a student who is not an Australian citizen or permanent resident and is required to hold a student visa for the purpose of study in Australia.

**National Code** means the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (and subsequent amendments) which outlines nationally consistent standards for the conduct of registered providers and the registration of their programs.

**Non-award student** means a person who is enrolled in a unit of study at a SGA college who is not enrolled in a course of study leading to a formal award issued by SGA, or enrolled as an exchange student or study abroad student.

**Non critical incident** means an event unanticipated or outside the accepted social norm, for which SGA has strategies and procedures in place to manage with little or no external assistance and in the experience of the general community, would not be considered an extraordinary occurrence or situation. It may involve:

- |   |                         |
|---|-------------------------|
| • minor accident or injury                  | • intruders             |
| • student misconduct                        | • first aid             |
| • conflict                                  | • minor flooding        |
| • racism                                    | • minor property damage |
| • minor theft                               | • absenteeism.          |
| • brief interruption to supply of a utility |                         |

**Notifiable critical incident** means a critical incident involving a student which involves the death of a student; a serious injury or illness of a person; or a dangerous incident arising out of an activity carried out by a student while undertaking a College activity at any place where a student goes, or is

likely to be, while at study. Notifiable critical incidents may relate to any person whether a student, employee, contractor or member of the public.

Notifiable critical incidents and other material breaches in safety that impact on students, including recurring incidents of sexual assault or sexual harassment, are notifiable to TEQSA consistent with Section 29(1)(a) of the *Tertiary Education Quality and Standards Agency Act 2011* (TEQSA Act) no later than 14 days after the day that the provider would reasonably be expected to have become aware of the event.

Notifiable student critical incidents that involve a student under the age of 18 are notifiable to the relevant Commonwealth, State and Territory government child/family protection agency<sup>2</sup> by the fastest possible means consistent with this policy and SGA's Safety and Wellbeing of Under-18 Students Policy and Procedure.

Notifiable student critical incidents that also involve an employee, contractor or visitor critical incident are notifiable to the relevant Commonwealth, State and Territory government WHS/OHS Agency by the fastest possible means, consistent with the applicable regulations<sup>3</sup> and related SGA human resources policy and procedure.

**Overseas Student** means a person (whether within or outside Australia) who holds a student visa for study in Australia as defined by the ESOS Act (may also be referred to as international student).

**Special Consideration** means special consideration given to a student for one or more examinations or assessments, due to illness, injury or misadventure, in accordance with advertised policies.

**Student** means a person who is currently:

- a confirmed admitted student in a course delivered by SGA; or
- an exchange student or study tour student participating in study activity delivered by SGA.

#### 4. Policy Provisions

- 4.1 SGA recognises the duty of care owed to its students and staff and visitors and that planning for the management of a critical incident involving an individual or group of students is essential.
- 4.2 This policy and procedure has been developed to ensure each SGA officer and College has:
- (a) an effective approach in responding to critical incidents as they occur; and
  - (b) appropriate support and counselling services available to those affected; and
  - (c) appropriate training and information resources are provided to the relevant staff and CIRC Group.
- 4.3 SGA is committed to ensuring that suitably trained personnel are identified who can provide support in relation to student critical incident enquiries and concerns, and that these personnel are accessible and able to assist students to access the appropriate support services.
- 4.4 SGA aims to ensure that appropriate resources are available to respond to all aspects of a Critical Incident, including:
- (a) physical and psychological safety of affected students and staff;
  - (b) emotional and physical support; and
  - (c) interventions required at different phases following an incident.

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<sup>2</sup> Commonwealth, State and Territory Child Protection Legislation for each College State and Territory can be accessed at <https://www.aihw.gov.au/reports-data/health-welfare-services/child-protection/child-protection-legislation-by-jurisdiction>.

<sup>3</sup> Commonwealth, State and Territory WHS/OH&S acts, regulations and codes of practice for each College State can be accessed at <https://www.business.gov.au/risk-management/health-and-safety/whs-oh-and-s-acts-regulations-and-codes-of-practice>.

- 4.5 SGA will keep appropriate records of critical incidents involving students and of follow up action taken.
- 4.6 SGA aims at all times to ensure the level of response to critical incidents involving students is appropriate.
- (a) Responses to Critical Incidents will be timely and professional, and take into account the safety of individuals involved as the paramount consideration.
  - (b) Where it is suspected that a crime has taken place, care shall be taken to preserve the scene of the incident and any related evidentiary items, provided that it is feasible to do so without adversely impacting on health and safety.
  - (c) The level of response required to a critical incident may vary in accordance with the circumstances and scale of the incident. The procedure set out herein sets out the considered response to a Critical Incident. It is not to be viewed as restricting any response by frontline responders, staff, management, the Critical Incident Response Coordinating Group (CIRC Group), or the Critical Incident Case Manager.

## **5. Relationship with other policies**

- 5.1 Emergencies that impact a campus' people, operations or the environment in a significant way are to be handled in accordance with the College's Business Recovery Plan (BRP). The BRP sits within SGA's Business Continuity Planning (BCP) framework and covers business emergency and crisis management. It includes a call tree to support the effective recovery of the organisation in a crisis or disruptive incident.
- 5.2 When an incident reported under this policy involves a student under the age of 18 it should be dealt with as set out in the policy and procedures herein, which includes reference to SGA's Safety and Wellbeing of Under-18 Students Policy and Procedure and notified to the relevant Commonwealth, State and Territory government child/family protection agency<sup>4</sup> by the fastest possible means.
- 5.3 Critical incidents involving students that also involve a staff, contractor or visitor critical incident are also to be responded to with consideration of related human resources policy and procedures, as well as Commonwealth, State and Territory WHS/OHS regulations<sup>3</sup> applicable to the location where the incident occurred.
- 5.4 When an incident of student bullying, discrimination or harassment, including sexual harassment or sexual assault is reported and alleged against a staff member the allegation should also be dealt with in accordance with the Staff Anti-Bullying, Harassment and - Discrimination Policy and Staff Equal Employment Opportunity Policy.
- 5.5 When managing concerns reported under this policy it may become apparent that the situation also needs to be managed with consideration of one or more other College policy, including but not limited to the:
- College Business Recovery Plan;
  - SGA Standards of Conduct Policy;
  - Safety and Wellbeing of Under-18 Students Policy and Procedure;
  - Student Disability Policy and Procedure;
  - Provision of Support for Students with Disabilities Policy and Procedure;
  - Student Support Policy;
  - Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy;
  - Monitoring Student Attendance Policy and Procedure;
  - ANZ HR Public Relations and Media Policy;
  - Global Code of Conduct; and
  - Various human resources policy and procedures as relevant to the nature of any incident.

- 5.6 Where a critical incident involves a student currently enrolled in and undertaking a university partner course it is vital that the partner university is promptly contacted, (e.g. DVC-Academic or the Registrar). The situation is to be managed with consideration of the university partner's policy.
- 5.7 College staff have certain obligations and responsibilities under the Student Privacy Policy which protect individuals' rights in relation to the collection, use, storage and disclosure of personal information and personal health information held by the College.

## **6.0 Procedures**

### **6.1 Reporting a critical incident**

Reports of critical incidents can be made in person by:

- one or more staff members or affiliates
- a student or group of students
- family or friends of a student involved in an incident
- any Australian police officer
- a member of the public
- the media, or
- other person aware of the incident.

All critical incidents involving students should be reported to the College within the first 24 hours to:

- Head of College, Campus Manager, a member of the Campus Security, or to a College Office at the Student Services counter; or
- Email: [studenthelp@studygroup.com](mailto:studenthelp@studygroup.com); or
- Phone the College Emergency Helpline 24 hour telephone helpline:
  - ANU College - phone 02 6125 0597 (Emergency)
  - Flinders International Study Centre (FISC) - phone: Flinders Security Service: (08) 8201 2880; and/or External ALLIANZ Emergency 24/7: 1800 816 500
  - Taylors College (Perth campus) – phone 0424 267 050 (Emergency 24/7)
  - Taylors College (Sydney campus) – phone 0407 663 989 (Emergency 24/7).

#### **Notifying external services for critical incident response assistance**

- External emergency services (e.g. Life threatening situations, such as a car crash or a fire) should be called where appropriate, dialling the **000** phone service.
- For non-urgent matters local services (e.g. police, crises help, etc.) may need to be called. Refer to the Australian Government Support Services for students website at <https://www.studyinaustralia.gov.au/english/live-in-australia/support-services>.

A staff member who becomes aware of a critical incident is considered a "First Responder". It is important that the first responder seeks first to promptly address any emergency needs and then escalates the matter to their line manager or the Head of College or their delegate as quickly and as responsibly as possible. Where a critical incident involves a student undertaking a university partner course it is vital that the partner university is promptly contacted (e.g. DVC-Academic or the Registrar).

The "First Responder" must ensure a "SGA Student Critical Incident Report Form" form (see Appendix C) is completed as outlined in Step 1 below.

## 6.2 Responding to and Managing Critical Incidents

Responding to and managing the student critical incident event or issue involves the following five (5) steps. For a flow chart summarising these steps see Appendix A.

### Step 1: Initial Incident response

When a **Local Lead / First Responder** becomes aware of an incident they should take the following actions as soon as possible:

Immediately or as soon as practical

*First Responder*

1. Determine the nature of the incident.
2. Ensure safety and welfare of those involved.
3. Reassure affected persons.
4. Arrange security support or counselling or medical treatment as necessary by contacting College First Aid Officer, College Counsellor, Campus Security, and/or other Emergency Services (000 or 112) if required.
5. Inform their Head of College or their delegate of the incident by either texting or calling to relay key details.

The Head of College (or their delegate) is responsible for co-ordinating the initial response to a critical incident.

6. Secure the incident site from further disturbance if applicable (e.g. crime scene) and able to do so safely.

Within 30 - 60 minutes

*First Responder*

1. Establish a clear understanding of the known facts by gathering facts on the incident, including details on the location and time of the incident, and the names and contact details of the student(s) and others involved in the incident.
2. Determine the current whereabouts of the affected student(s) and any other affected person(s).
3. Initiate the prompt completion of a *SGA Student Critical Incident Report Form* by the appropriate senior College staff member as soon as practical and circulate it to the Head of College (or delegate) for their circulation to the Critical Incident Coordination Group (CIRC Group) in advance of the initial meeting (see below)<sup>4</sup>.

Within 60 minutes

*Head of College*

1. The Head of College (or their delegate) is responsible for contacting the emergency contacts of the student(s) involved in the incident, and any homestay service providers and caregivers and Head of ISCs and/or the relevant contact at the partner university (e.g. DVC-Academic or the Registrar).

### Step 2: Convening of Critical Incident Coordination Group (CIRC Group)

Within 60 minutes – 2 hours

*Head of College*

The Head of College (or their delegate) is responsible for convening a Critical Incident Coordination Group (CIRC Group) meeting (face to face or by teleconference).

The primary purpose of the CIRC group is to coordinate the response and monitor the management and reporting of critical incidents involving students and their aftermath.

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<sup>4</sup> Refer to the College Critical Incident Response Contacts Card readily available at the College reception desk. This card includes key contacts at university partner colleges for critical incidents involving students of the partner university studying a program being delivered by the College on behalf of the university partner.

The Critical Incident Coordination Group (CIRC Group) (see Appendix B for Terms of Reference) convenes (face to face or by conference) to coordinate the response. The focus of the group's initial meeting is to:

1. Assign a group convenor to coordinate and chair the meetings for the group. The Head of College may act as the group convenor, or appoint an appropriate member of the Critical Incident Response Group to act as case manager.
2. Assign a case manager to coordinate all case materials and communications relating to the incident. The Head of College may act as case manager, or appoint an appropriate member of the Critical Incident Response Group to act as case manager. Refer to Appendix B for details on the role of the CIRC Group Case Manager.
3. Monitor and advise on management of incoming enquiries and outgoing information.
4. Ensure ongoing safety and welfare of all students, staff and other College stakeholders affected by the incident as necessary and appropriate.
5. Ensure student(s), staff, emergency contacts, parents/guardians, homestay service providers, caregivers involved in the incident are kept informed, as appropriate.
6. Identify students, staff and any other College stakeholders "at risk" due to the incident.
7. Discuss counselling and other intervention and support plans.
8. Set up a recovery room in the Centre for drop in support.
9. Prepare a Student Critical Incident Support Case Plan for the student(s) affected by the Critical Incident for ongoing handling by the Case Manager that ensures:
  - Student(s), staff, emergency contacts, parents/guardians, homestay service providers, caregivers involved in the incident are kept informed, as appropriate;
  - Appropriate assistance is provided to the student and their family, including (but not limited to) access to counselling services, legal assistance, language translation services, transport to or from the place of the incident, clothing, food or other supplies for the affected student(s), emergency housing or hotel accommodation, etc., as required.
10. Prepare a Student Critical Incident Response Communication Plan and written statement for the various stakeholders for release authorisation by Head of ISCs (or delegate).

This Plan to include consideration of communications (as applicable) to:

- Fellow students and staff
- Family, next of kin or guardian
- Partner university
- Key stakeholder groups across the business, including university partners, the Head of ISCs, and senior leadership staff in compliance, human resources, IT, finance, legal, and academic quality
- Overseas Student Health Cover
- External and emergency providers, including doctors, hospitals and other health services
- Government agencies, including the Department of Foreign Affairs and Trade, the Department of Home Affairs (DHA), TEQSA, AusAID and ESOS Secretary via PRISMS in the case of death or prolonged absence
- Relevant embassies and consulates, community cultural groups, sponsors, chaplains and religious personnel
- Media by COO-ANZ or delegate
- Other key stakeholders.

Within 24 hours

*Head of ISCs / Head of College*

1. The Head of ISCs with Head of College (or their delegates) deploy agreed communications to stakeholders.
2. The Head of College (or their delegate) to notify DHA (Department of Home Affairs) and PRISMS in the case of death or serious incident resulting in prolonged absence involving a student under 18 years of age.

### **Step 3: Provision of support services for international students and their families and management of critical incident**

24 hours – 1 week

*College Counsellor, Head of College, CIRC Group*

1. Arrange counselling as needed.
2. Provide opportunities for debriefing for staff and students.
3. Provide support and information on how to access SGA's Employee Assistance Program (AccessEAP) and other support services to staff.
4. Debrief all relevant persons.
5. Notify DHA (Department of Home Affairs) and PRISMS in the case of death or serious incident resulting in prolonged absence impacting on a student's course duration.
6. Notify TEQSA within 14 days of the incident if the critical incident involves material breach in safety that has an impact on students (whether it involves student, employee, contractor or member of the public), such as:
  - the death of a person;
  - a serious injury or illness of a person;
  - a 'dangerous incident' arising out of an activity carried out by a student while undertaking a College activity at any place where a student goes, or is likely to be, while at study; and/or
  - a recurring incident of sexual assault or sexual harassment.
7. Arrange access to legal assistance if required and appropriate.
8. Manage death notices, funeral arrangements and other personal matters (as required).
9. Restore normal functioning of the College as soon as possible.
10. Continue to ensure student(s), staff, emergency contacts, parents/guardians, homestay service providers, caregivers involved in the incident are kept informed, as appropriate.
11. Facilitate ongoing CIRC Group meetings and strategy reviews.

### **Step 4: Follow up and evaluation**

Within first month

*College Counsellor*

- Continue to monitor student wellbeing and provide referral to Mental Health Services as required.
- Arrange a memorial service, if appropriate.

Approximately 3 months following the incident

*Head of College, CIRC Group*

The Head of College / coordinator of the CIRC Group (or delegate) will:

- consult with staff and student counselling services regarding the provision, timing and format of appropriate debriefing processes for staff and students, and ongoing support and counselling that may be required; and
- evaluate the implementation of procedures and responses, and suggest possible changes and improvement for future critical incidents. Suggestions are to be reported to the Head of ISC for inclusion in appropriate management reports.

Annually

*Head of ISCs*

- Annually, the Head of ISC reports to the SGA Quality and Risk Committee on the management of student critical incidents.

## **Step 5: Ongoing monitoring**

### **Ongoing**

*College Counsellor, Head of College, CIRC Group*

- Monitor staff and students for signs of delayed stress and the onset of post-traumatic stress disorder - refer for specialised treatment.
- Provide support if needed.
- Plan for and be sensitive to anniversaries, inquests and legal proceedings.
- Access specialist support if needed including legal assistance for the student/s if required.
- Provide staff training and awareness about Critical Incident Response Protocols, inclusive of specific training on the differing provisions relating to managing critical incidents involving students under 18 years.
- Record staff training, inclusive of specific training on the differing provisions relating to managing critical incidents involving students under 18 years, on the official SGA College Critical Incidents Training Register.
- Facilitate ongoing CIRC Group meetings and strategy reviews.

### **6.3 Managing student fatalities**

In the event of the death of a student, the case manager is responsible for ensuring that appropriate contact is made with the deceased student's next of kin or other family.

If the State or Federal Police contact the College for next of kin details, the case manager will seek approval to release the requested information through the Head of ISCs.

The case manager will prepare letters of condolence to be sent on behalf of the College. The case manager will:

- ensure that the student's record is updated;
- where relevant, facilitate appropriate reporting to the Department of Home Affairs via the PRISMS; and
- update the Critical Incident Register to allow for future reporting and reference.

### **6.4 Student support**

In consultation with the relevant staff, Student Support Services may provide the following support to students who are affected by a critical incident:

- expedited counselling appointments
- in situ counselling support
- a 'quiet space' reflection room
- a public grief or sorrow book
- support for Special Consideration applications
- ongoing assistance and recovery; and
- links to community agencies.

The case manager will advise the staff and students of the available support services clearly, and early in the development of a critical incident response timeline.

An early initial debrief would be beneficial as soon as possible after the incident event on either an individual or group basis. Also support for teaching staff who usually have a close relationship with their students in this educational environment, should be considered with reference to SGA's relevant human resources policies and associated AccessEAP Counselling service for staff.

## **6.5 Academic support for students involved in critical incidents**

Special consideration to be extended to a student/s in respect of their course and any assessment item in the course as specified in related SGA Policy and Procedure. This includes (but is not limited to):

- (a) Deferred assessment for students prevented from undertaking an assessment item as specified in the SGA Student Assessment Policy and Procedure;
- (b) Variation of course study duration due to special circumstances as specified in the SGA Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy;
- (c) Periods of leave of absence as specified in the SGA Monitoring Student Attendance Policy and Procedure; and
- (d) The maximum period for completing a program to be extended on the basis of exceptional circumstances affecting the student's progress in the program as specified in the SGA Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy.

## **6.6 Additional support for international students and their families**

Where appropriate in the event of a critical incident resulting in serious injury and hospitalisation, the College may offer financial assistance to the student's parents, to enable them to meet travel costs and visit the student in hospital. This may include (but is not limited to):

Where appropriate in the event of the death of an international student, SGA may offer financial assistance to the student's parents for:

- travel to and from the student's college city;
- accommodation costs while in the student's college city; and
- translation costs while in the student's college city.

SGA will work with the student's family and any relevant insurance provider to expedite appropriate arrangements for:

- either or both of a funeral or cremation in Australia; or
- repatriation of the student's body to their home country.

Where appropriate, and depending on the nature of the critical incident, the case manager will liaise with the embassy or consulate of the student's country of origin consistent with the SGA Student Privacy Policy. Discussions may include protocols and arrangements for:

- greeting and supporting the student's family;
- transport and accommodation;
- a funeral, cremation or repatriation of the student's body;
- provision of legal services; and/or
- responding to inquiries from the Police or Coroner, etc.

## **6.7 Critical incidents involving international students under 18 years**

In the event of a critical incident that disrupts or has the potential to disrupt the welfare arrangements of one or more international students who are under 18 years of age, the College will:

- (a) assess the current suitability of the student's accommodation, support and welfare arrangements;
- (b) contact any relevant service provider engaged by SGA to provide welfare arrangements;
- (c) where necessary, arrange emergency accommodation and organise alternative support and welfare arrangements for the student; and
- (d) contact the student's parents, next of kin or legal guardians as soon as possible following the incident.

If an international student who is under 18 years of age goes missing from their approved accommodation and cannot be found or contacted, SGA will report the student to the Department of Home Affairs via PRISMS within 24 hours in the manner consistent with SGA's Safety and Wellbeing of Under-18 Students Policy and Procedure.

The College will make all reasonable efforts to immediately notify the parents or legal guardians of an international student under 18 years of age, if the College can no longer take responsibility for the student's welfare.

## **6.8 Complaints and appeals relating to Critical Incidents**

Students who believe that they have been treated unfavourably or unfairly or have been subject to discrimination should use the SGA Student Complaints and Appeals Policy and Procedure.

## **6.9 Roles and responsibilities**

(a) **Head of International Study Centres** (Head of ISCs) is responsible for:

- the promulgation and implementation of this policy and procedure across SGA's colleges in accordance with the scope outlined above;
- ensuring college staff are provided with appropriate training (minimum annually) to ensure the duty of care for students is uppermost in their minds; and
- reporting on critical incidents involving students to SGA management, including provision of an annual report on critical incidents involving students to the SGA Quality and Risk Committee.

(b) **Head of College** is responsible for:

- the promulgation and implementation of this policy and procedure to all College staff and students and ensuring its compliance and effective implementation;
- ensuring a CIRC Group is appropriately established to support the management of critical incidents involving students and maintain a record of the membership of the group;
- ensuring all critical incidents and remedial action taken is promptly and appropriately recorded and maintained on SGA's College Critical Incident Register;
- ensuring all critical incidents and remedial action records are also recorded on SGA's Critical Incidents Report Form and maintained in accordance with this policy;
- ensuring information and resources is available to staff to support their effective implementation of this policy and procedures.
- the provision of timely and appropriate reports on critical incidents involving students to the Head of ISC, including a summary annual report in the requested format.

(c) **CIRC Group Members, Critical Incident Case Manager and all College staff** are responsible for being aware of, complying with, and assisting in ensuring the effectiveness of the implementation of this policy and procedure.

## **7. Policy Review**

This policy is reviewed at a minimum of once every 5 years by the policy owner (or delegate) to ensure alignment to appropriate strategic direction and its continued relevance to current and planned operations. The next scheduled review of this document is listed in the document history section of this document.

## **8. Records Management**

Records in association with this policy will be kept in accordance with SGA's Records Management Policy. Specifically, SGA will maintain a written record of any critical incident and remedial action taken by SGA for at least five years after the overseas student ceases to be an accepted student, or as otherwise required by law.

Confidential documents related to the implementation of this policy and procedure will be maintained according to the SGA Student Privacy Policy. Personal information and health information relating to critical incident relating to student critical incidents is kept confidential. It is only disclosed to persons who have a role in considering and managing the critical incident, or as otherwise required by law.

## 9. Related Documents

SGA Student Privacy Policy, SGA Records Management Policy, SGA Safety and Wellbeing of Under-18 Students Policy and Procedure, SGA Student Assessment Policy and Procedure, SGA Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy, Student Critical Incident Report Form, SG Global Code of Conduct (HR), and ANZ HR Public Relations and Media Policy. Student focused policies, procedures and forms can be accessed from the College's Policies webpage. The Student Critical Incident Report Form is also provided herein at Appendix C.

## 10. Related Regulations

This policy has been developed in line with requirements set out in the: Education Services for Overseas (ESOS) Act 2000 (and its amendments); National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018) including Standards 5 and 6 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, in relation to managing critical incidents involving international students including those under the age of 18. It has also been developed with consideration of other quality assurance frameworks in Australian education and training including the Higher Education Standards Framework (Threshold Standards), the English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018, the Foundation Standards (operating adjunct to the National Code), the NSW Education Act and related regulations for NSW Education Standards Authority (NESA) registered High Schools, the Australian Qualifications Framework (AQF), the Tuition Protection Service (TPS), and other Commonwealth, State and Territory legislation and regulatory frameworks and standards including the Privacy Act 1988, Corporations Act 2001; and Competition and Consumer Act 2010.

### Document Approval

<b>Document ID</b>	SGA Critical Incidents Involving Students Policy and Procedures		
<b>Document Owner(s)</b>	Head of International Study Centres		
<b>Approved by</b>	SGA Board of Directors	<b>Date Approved</b>	19 March 2019
		<b>Date Commencing</b>	25 March 2019

### Document History

<b>Commencing Date</b>	<b>Summary of Changes</b>	<b>Next Review Date</b>
25 March 2019	v1.0 Establishment of policy (Supersedes SG-ANZ Critical Incident Policy and ANU College Critical Incident Policy and associated procedures)	March 2024

## Critical Incident Response and Management Flowchart

Step	Activity	Timeframe
<b>Step 1</b>	<b>Initial response to reported critical incident</b> <i>by First Responder</i>	Immediately or as soon as practical on becoming aware of incident
		
<b>Step 2</b>	<b>Convene Critical Incident Coordination Group (CIRC Group)</b> <i>by Head of College</i>	Within 60 minutes – 24 hours of critical incident
		
<b>Step 3</b>	<b>Provision of support services for international students and their families and management of critical incident</b> <i>by College Counsellor, Head of College, CIRC Group</i>	Within 24 hours – 1 week of critical incident
		
<b>Step 4</b>	<b>Follow up and evaluation</b> <i>by College Counsellor, Head of College, CIRC Group</i>	1-3 months following critical incident
		
<b>Step 5</b>	<b>Ongoing monitoring</b> <i>by College Counsellor, Head of College</i>	Ongoing

## Appendix B

### Critical Incident Response Coordinating Group (CIRC Group) Membership and Terms of Reference

#### Membership

Depending on the type of incident, a Critical Incident Response Coordinating Group (CIRC Group) will normally be convened by the Head of College (or their delegate).

Membership of the Group will include:

- Head of College (Convenor and Chair) (or delegate)
- College Academic Director /Deputy Principal/ Dean of Students/Program Manager and Campus Manager (or their delegate)
- Other College staff nominated by the Convenor and Chair, for example Welfare Officer/Counsellor
- Head of ISCs (or their delegate)
- Critical Incident Case Manager nominated by the Convenor and Chair. The Convenor and Chair may act as case manager, or appoint an appropriate member of the CIRC Group to act as the case manager.

#### Functions

The function of the CIRC Group is to:

- Coordinate the response and monitor the management and reporting of critical incidents involving students and their aftermath.
- Ensure ongoing safety and welfare of all students, staff and other College stakeholders affected by the incident as necessary and appropriate
- Ensure student(s), staff, emergency contacts, parents/guardians, homestay service providers, caregivers involved in the incident are kept informed, as appropriate
- Prepare a Critical Incident Support Case Plan for the student(s) affected by the Critical Incident for ongoing handling by the Case Manager that ensures
- Student(s), staff, emergency contacts, parents/guardians, homestay service providers, caregivers involved in the incident are kept informed, as appropriate
- Ensure appropriate assistance is provided to the student and their family, including (but not limited to) access to counselling services, legal assistance, language translation services, transport to or from the place of the incident, clothing, food or other supplies for the affected student(s), emergency housing or hotel accommodation, etc., as required.
- Prepare a Critical Incident Response Communication Plan and written statement for the various stakeholders for release authorisation by Head of ISC (or delegate). This Plan to include consideration of communications (as applicable) to:
  - Fellow students and staff
  - Key stakeholder groups across the business, including university partners, the Head of ISCs, and senior leadership staff in compliance, human resources, IT, finance, legal, and academic quality
  - Overseas Student Health Cover (Allianz); DHA (Department of Home Affairs) and other external and emergency providers, including doctors and hospitals
  - Government agencies, including the Department of Foreign Affairs and Trade, the Department of Home Affairs, TEQSA, AusAID, and via PRISMS in the case of death or prolonged absence
  - Relevant embassies, consulates, chaplains, religious personnel

- Media to be released by COO-ANZ (or delegate), community cultural groups, sponsors, etc.

### **Role of the Critical Incident Case Manager**

The role of the Critical Incident Case Manager is to facilitate the management and resolution of any type of critical incident involving students.

The case manager is responsible to the CIRC Group Convenor for:

- Coordinating the CIRC Group meetings
- Coordinating the development and implementation of the CIRC Group's established:
  - Student Critical Incident Support Case Plan  
*(This includes coordinating assistance for the student and their family, including (but not limited to): access to counselling services, legal assistance, language translation services, transport to or from the place of the incident, clothing, food or other supplies for the affected student(s), emergency housing or hotel accommodation, etc., as required)*
  - Student Critical Incident Response Communication Plan
- Facilitating arrangements that ensure student(s), staff, emergency contacts, parents/guardians, homestay service providers, caregivers involved in the incident are kept informed, as appropriate
- Ensuring, the release of any personal information to external parties is in accordance with subclause (7) must comply with the SGA Student Privacy Policy.
- Immediately notifying the CIRC Group Convenor and Chair of any changes to the status of the critical incident, including changes that:
  - involve the safety, wellbeing or death of a student
  - varies the affected students, staff or other stakeholders
  - requiring access to emergency funds; or
  - involve media reports or otherwise attracts unpremeditated attention or publicity, and
  - supporting the CIRC Group Convenor in the resolution of the critical incident case as required.

## Student Critical Incident Report Form

College: .....

Date of incident: ..... Time of incident: .....

Reported by: Name ..... Position/Dpt ..... Phone .....

Reported to: Name ..... Position/Dpt ..... Date .....

How reported: (Summarise how staff become aware of the incident) .....

.....

**DETAILS OF PERSON(S) INVOLVED**

Student details:

	Name	Student number	Enrolled Course	Emergency contact	Under 18 years of age (Y/N)	Accomm. Provisions (e.g. residence, homestay)
1						
2						
3						

Other party(ies) involved (First and Last Name; Phone contact; Relationship to incident, e.g. student experiencing incident, alleged offender)

.....

.....

Incident Witness(es): (First and Last Name; Phone contact; Relationship to party(ies) involved in incident)

.....

.....

**INCIDENT DETAILS**

Location where incident occurred: (Provide as much detail as possible – dot points preferred)

Off campus     On campus     In classroom     Other (e.g. class field trip) \_\_\_\_\_

Details (e.g. address, classroom number): .....

Description of Incident: (Provide as much detail as possible – dot points preferred)

.....

.....

.....

Description of support provided at initial response: (Provide as much detail as possible – dot points preferred)

.....

.....

.....

Description provided by: (Name and relationship to incident, e.g. student experiencing incident, witness)

.....S

Description provided to: (Employee name, position, signature and date)

Employee name & position ..... Signature ..... Date: .....

Senior staff member to complete

Is this a Critical Incident?

YES. Incident is to be recorded on Critical Incident Register by authorised officer. This form must be forwarded within 6-24 hours of the incident to the Head of College (or delegate) for providing to the Critical Incident Response Coordinating Group (CIRC Group). Form forwarded to : .....

NO. Appropriate support to be provided. Counsellor to monitor student for 2 months. No further action is required