



IHSTS Critical Incident Management Policy

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| IHSTS Policy Category | Operational | | |
| Policy Owner | IHSTS Chief Executive Officer | | |
| Responsible for Implementation | IHSTS Chief Operating Officer | | |
| Review Date | March 2025 | | |
| Relevant to | IHSTS Directors, Staff, Students, Contractors, and Visitors | | |
| Related Documents | IHSTS Work Health & Safety Framework IHSTS Health and Safety Policy IHSTS Staff Code of Conduct IHSTS Privacy Policy IHSTS WHS Management Plan IHSTS Emergency Action Plan | | |
| Version | Authorised by | Approval Date | Effective date |
| 1.0 | Finance, Audit, and Risk Management Committee | March 17, 2023 | March 17, 2023 |

1. Purpose

IH Sydney Training Services Pty Ltd., trading as IH Sydney and Business College at IH (ihBC), and PBL Education Pty Ltd. (PBL) (a subsidiary) trading as International Graduate Institute (IGI) are committed to providing all its directors, staff, students, contractors, and visitors with a safe working environment on the IHSTS campuses.

This Policy aims to identify the incidents that could impact students, staff, contractors, visitors, and their wellbeing. Non-critical incidents and other general risk management processes for health, safety, and wellbeing are articulated through the IHSTS Health and Safety Procedure. Processes for ensuring operational continuity are included in IHSTS’s Business Continuity Plan.

2. Definitions

| Definitions | |
|----------------------|---|
| Assembly Area | A predetermined external area is used when one or more facilities are evacuated. This is a designated area for the building to account for and brief personnel on future actions. |
| Chief Warden | The Campus Manager is the Chief Warden for their respective site. The Campus Safety Representatives are the nominated Emergency Controllers, but in the absence of the Chief Warden, they will assume that role until a Chief Warden is available. The Chief Warden or Emergency Controllers shall communicate any missing person’s messages to appropriate authorities (e.g., fire brigade) and coordinate activities as directed by the Emergency Services. |

DISCLAIMER

Version control and quality control cannot be guaranteed once downloaded from the IH website.

| Definitions | |
|--------------------------|--|
| Contractor | A person engaged by the business to perform duties of an administrative or academic nature, including Teachers and Trainers. For the purpose of this Policy, the term Contractor does not include independent contractors or subcontractors visiting the business to perform non-Academic or non-administrative duties such as tradespersons, builders, construction workers, or other roles that would not be typical of an IHSTS employee or otherwise covered by an IHSTS Position Description. |
| Critical Incident | A traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear, or injury and could affect staff and/or student's ability to undertake or complete a program, such as but not limited to, incidents that may cause physical or psychological harm. |
| Risk | The possibility that harm (death, injury, or illness) might occur when exposed to a hazard. |
| Staff | Any person currently employed by IHSTS and its subsidiary. |
| Student | Any person currently enrolled in an IHSTS or PBL course. |
| Warden | A trained person is responsible for evacuating specific areas of a building. |

3. Scope

This Policy applies to all IHSTS and its subsidiary directors, staff, students, contractors, and visitors at IHSTS campuses.

4. Policy

4.1 Responsibilities

- IHSTS's Chief Executive Officer (CEO) is ultimately responsible and accountable for the health and safety of students, staff, contractors, and visitors at all of IHSTS's campuses. The CEO has delegated the management of critical incidents to the Chief Operating Officer.
- IHSTS Chief Operating Officer nominates the Director of People and Culture to be responsible for the coordination of critical incident management processes.
- The Director of People and Culture is responsible for the following:
 - Identifying and reporting patterns of incident occurrences to the Chief Operating Officer and the Senior Management Committee.
 - Using IHSTS's risk-based approach to managing critical incidents identified in the IHSTS Risk Management Framework will follow a four-stage model of prevention, preparedness, response, and recovery.
- IHSTS Campus Managers are responsible for reporting critical incidents at their respective campuses to the Chief Operating Officer and/or the Director of People and Culture.
- All IHSTS staff are expected to make themselves available if and when assistance and/or activity relating to critical incident management is required.

4.2 Prevention through Identifying, Monitoring, and Assessing risks

The Director of People and Culture is responsible for coordinating the implementation of an IHSTS campus-wide risk-based approach to critical incident management and will:

- Consult with the Chief Operating Officer, the Senior Management Team, and other appropriate, relevant parties to identify the key areas within IHSTS's operations where critical incidents could arise and ensure effective prevention and mitigating measures are implemented.
- Ensure that IHSTS's exposure to critical incidents is assessed regularly.
- Ensure that an appropriate allocation of resources, responsibilities, and the frequency of risk activities are initiated to align with the IHSTS Risk Management Framework and all associated Work Health and Safety policies and procedures.
- Develop and maintain an understanding of the different types of critical incidents that may occur within IHSTS based on the needs and characteristics of its student cohorts.
 - Examples of Critical Incidents that may occur:
 - Missing students
 - Sexual harassment
 - Severe verbal or psychological aggression
 - Death or serious injury
 - Natural disaster (i.e., flood)
 - Fire, bomb threat, or an active shooter on IHSTS campuses
 - Domestic violence, physical, sexual or other types of abuse issues
 - Other non-life-threatening events.

4.3 Awareness

IHSTS recognises that through adopting safe practices and behaviours, the severity of a critical incident issue may be minimised or reduced if students and staff seek assistance for early intervention. Consequently, it is the Director of People and Culture's responsibility to ensure the following initiatives are implemented throughout IHSTS:

- a) Raising students and staff awareness of certain risks and/or situations through regular training initiatives (as appropriate), communication, and readily available information communicated at orientation, induction, emails, student websites and the IHSTS staff intranet (StaffHub).
- b) IHSTS students know they can get assistance from Student Service personnel (available on every campus) and relevant IHSTS staff or call the emergency services as early as possible to prevent the worsening or escalating of a critical incident.
- c) IHSTS makes available and accessible evidence-based education programs and initiatives on prevention and response to Sexual Assault and Sexual Harassment and Respect at Work.
- d) IHSTS makes available and accessible regular updates regarding alcohol and drug abuse prevention.
- e) Medical Emergency Plan Posters are displayed in a prominent position on all IHSTS campuses.
- f) Instructions and guidance regarding emergency procedures (i.e., emergency warning system, assembly areas) are communicated and accessible.

4.4 Preparedness

4.4.1 IHSTS will ensure its preparedness to respond and recover from critical incidents based on a Work Health Safety (WHS) Framework and associated documentation, including policies, procedures, training, communication, and an internal audit function.

4.4.2 The Director of People and Culture is responsible for the following:

- a) Ensuring adequate and accurate documentation of all processes and templates are maintained to ensure currency of information.

- b) Key documents regarding critical incidents, including emergency contacts, wardens and first aiders' contact lists, and emergency and evacuation plans, are available and accessible by all IHSTS and its subsidiary staff and students.
- c) Developing and maintaining accurate evacuation plans, which include:
 - Identification of potential fire emergencies
 - Membership of the emergency response teams (i.e., first aiders, fire wardens)
 - How to raise the alarm
 - Evacuation exits and routes
 - Strategies for assisting persons with special needs
 - Designated assembly area
 - Training and practice evacuations.
- d) Distribute, as appropriate, any building management fire and emergency procedures to relevant staff.
- e) Maintaining current information regarding SES local plans and other critical information from local authorities where IHSTS has a campus.

4.5 Roles

The Director of People and Culture ensures that all the roles identified in the critical incident procedures are filled and specific roles are easily identifiable in the event of an incident.

| Role | Identification (colour) |
|--------------|--------------------------------|
| Chief Warden | White |
| Warden | Red |
| First aiders | Green |

In an emergency, and in the event of insufficient wardens, the Chief Warden may request assistance from staff in implementing emergency procedures.

4.6 Equipment

The Director of People and Culture is responsible for ensuring that all appropriate equipment is available and operational on each IHSTS campus (i.e., fire extinguishers, fire blankets, or communication equipment).

4.7 Communication

The Director of People and Culture is responsible for ensuring that all students and staff are aware of the following:

- a) What do they do in the event of a critical incident?
- b) Whom to contact?
- c) The staff induction and student orientation programs include safe and appropriate behaviour in the event of a critical incident.
- d) Regular training sessions for designated emergency personnel.
- e) Scheduling regular emergency and critical incident sessions for all students and staff to ensure familiarity with the fire alarms, signals, evacuation routes, location of emergency exits, emergency areas, and where to find wardens and first aiders.

4.8 Training

The Director of People and Culture is responsible for ensuring appropriate training is undertaken by all staff members who have responsibilities under this Procedure. The Table below summarises the training needs for key functional areas supporting an effective response to critical incidents:

| Function | Staff |
|--|--|
| Conflict Resolution and de-escalation | Student Services/Department Heads |
| Providing support to minimise trauma | Student Services/Department Heads |
| Responding to first disclosures of sexual assault and harassment | Student Services/Department Heads |
| Facilitating referrals to appropriate services | Student Services/Department Heads |
| Evacuation Procedures | Wardens |
| Operation of fire alarm and emergency warning system | Wardens |
| Fire fighting | Wardens |
| Requesting emergency services | Student Services/Department Heads Wardens |
| Administering first aid | First Aiders |
| Answering a phone bomb threat call | Student Services |
| Handling suspicious mail or packages | Student Services |
| Assisting people with special physical needs during emergencies | Wardens |

4.9 Reviews

The Director of People and Culture conducts regular reviews/spot checks of IHSTS preparedness for responding to a critical incident. At least annually, a comprehensive review will be conducted with the findings and rectification actions presented to the Senior Management Team. Smoke alarms, protective equipment, fire extinguishers, and safe evacuation routes will be included in the review's scope.

5. Records and Privacy

IHSTS will maintain records of any critical incident and the remedial action taken for at least two years after the incident and/or after a student impacted by the incident ceases to be accepted.

Personal information disclosed and gathered concerning critical incidents must be stored in a confidential file. All staff will be made aware of the privacy and confidentiality requirements when handling, storing and divulging personal information during their induction program; it is unacceptable to talk with other staff members, students, contractors, or other persons about any complaints, discrimination, or harassment issue associated within the work environment.

6. Breaches

Any staff member or student found to breach this Policy. In that case, they may be subject to disciplinary action as outlined in the IHSTS Staff Code of Conduct Policy and Student Code of Conduct, which can be accessed via the IHSTS StaffHub and the appropriate business website.

7. References

- National Vocational Education Training Regulator Act 2011.

- Standards for VET Accredited Courses 2021
- Higher Education Standards Framework (Threshold Standards) 2021
- ELICOS Standards 2018
- Education Services for Overseas Students (ESOS) Act 2000
- Education Services for Overseas Students Regulations 2019
- The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (The National Code)
- Privacy Act 1988 (Cth)
- TEQSA Guidance note: Wellbeing and Safety
- Relevant Work Health and Safety Act and OHS Act and Regulations
- Modern Slavery Act 2018 (Cth)
- Australian Human Rights Centre, On Safe Ground: Strengthening Australian university responses to sexual assault and harassment. A good practice guide for Australian universities.

8. Document History

| Version | Date | Author | Reason | Sections |
|---------|------------|--------------------------------|---|----------|
| 1.0 | 05.03.2021 | Director of People and Culture | Establish a new policy | All |
| 1.1 | Sep 2023 | General Manager IGI | Extension of scope to include subsidiary entity | All |