

6.2.3 Critical Incident Policy and Procedure

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1.0 Rationale

This policy and procedure is a key component of the Risk Management Framework for Acknowledge Education (AE) (also known as Stott's College) and International College of Hotel Management (ICHM) (herein after referred to as the colleges). It aligns with parent group UP Education's Critical Incident Management Policy and Procedure.

The main purpose of this policy and procedure is to ensure that the colleges fulfill their duty of care to staff, students and other stakeholders. The policy and procedure aims to enable the colleges to respond promptly and efficiently to critical incidents while meeting all the necessary regulatory requirements for providing high-quality private education.

In the event of a critical incident, the colleges acknowledge the importance of having the right infrastructure in place to offer essential support services. This document outlines the policy, support mechanisms and procedures for managing a critical incident.

By implementing this policy, the colleges commit to having an effective approach to respond to critical incidents as they happen by ensuring that the team comes together during a difficult circumstance. It also ensures the availability of appropriate support and counselling services for those affected, along with providing staff with the necessary training and information resources.

2.0 Scope

The Critical Incident Policy and Procedure apply to all students enrolled in education and training programs delivered by AE and ICHM, including Higher Education, Vocational Education and Training (VET), Victorian Certificate of Education (VCE), and English Language Intensive Courses for Overseas Student (ELICOS) programs, including overseas students under the age of 18 years enrolled in VCE and ELICOS programs.

The policy applies to all critical incidents involving students that occur during, or arise in connection with, their enrolment, accommodation, welfare, support services, academic activities, work-integrated learning, placements, excursions, or any other activity for which the colleges have a duty of care or regulatory responsibility.

This policy also applies to all internal and external stakeholders involved in the delivery of education, accommodation, welfare and student support services, including staff, contractors, education agents, volunteers, homestay hosts and providers, third-party accommodation and welfare providers, placement hosts, and other service providers engaged by AE or ICHM.

The policy extends to incidents occurring across all relevant environments, including campuses, online learning settings, homestay accommodation, workplaces, and off-campus or external locations associated with the student's enrolment.

3.0 Regulatory Context

3.1 National Code of Practice for Providers of Education and Training to Overseas Students 2018

Under the National Code (Standards 5 & 6), education providers must have documented policies and procedures to manage critical incidents affecting overseas students. These procedures must ensure a timely, coordinated response, prioritise the safety and wellbeing of students, provide appropriate support and counselling, and include clear communication and escalation pathways with internal staff and external agencies where required. Providers must maintain records, review incidents to improve future responses, and ensure staff are trained and aware of their responsibilities, with obligations aligned to the ESOS Act and relevant legal and reporting requirements.

3.2 Higher Education Standards Framework (Threshold Standards) 2021

2.3.5: There is a critical-incident policy together with readily accessible procedures that cover the immediate actions to be taken in the event of a critical incident and any follow-up required.

6.2.1j: The occurrence and nature of ... critical incidents are monitored and action is taken to address underlying causes.

7.3.3c: Information systems and records are maintained, securely and confidentially as necessary to: document and record responses to ... critical incidents.

3.3 Victorian Registration and Qualifications Authority (VRQA) Minimum Registration Requirements

As part of the VRQA's conditions for school registration, schools (government and non-government) must maintain an Emergency Management Plan (EMP) that addresses emergency and critical incidents affecting the health, safety or wellbeing of students and staff. This is a regulatory requirement tied to school registration under the Education and Training Reform Act and Regulations. (Refer to the most recent Emergency Management Plan (EMP) for Stott's College by contacting the Head of Operations.)

3.4 National Higher Education Code to Prevent and Respond to Gender-based Violence 2025

Establishes legally enforceable standards requiring Australian higher education providers to embed comprehensive, trauma-informed and person-centred prevention and response frameworks for gender-based violence across institutional systems, policies and procedures.

While the Code does not expressly define "critical incidents" in the same manner as frameworks such as the ESOS Act 2000, its requirements directly inform how incidents involving gender-based violence must be identified, assessed, managed and escalated within institutional critical incident policies and procedures.

4.0 Guiding Principles

4.1 Safety and Timely Response.

The colleges will ensure the safety and well-being of the college community take precedence, guiding prompt and efficient responses during critical incidents.

4.2 Clear Communication and Coordination

The colleges will prioritise transparent communication and a coordinated approach, with a Critical Incident Management Team (CIMT) ensuring organised responses to critical incidents and disseminating information to the relevant internal and external stakeholders where required.

4.3 Cultural Sensitivity and Parental Involvement

As a provider of education to students from diverse age groups and backgrounds, the colleges ensure that services provided will be culturally and age-appropriate, recognising diversity, and involving parents or guardians for students under the age of 18 years where necessary.

4.4 Comprehensive Support Services with Empathy

The colleges are committed to providing comprehensive support and counselling services with empathy, respecting an individual's privacy, and acknowledging the emotional impact of critical incidents on individuals.

4.5 Record keeping and Continuous Improvement.

The colleges are dedicated to ensuring that critical incidents are well documented, and that the experience AE acquires through managing a critical incident is used to inform and improve processes to ensure continuous improvement and maximise the provision of safe and secure services to students and staff.

5.0 Policy

5.1 Identifying a Critical Incident

The National Code 2018 definition of a Critical Incident is “a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury. At AE and ICHM, a critical incident may cause students, staff, contractors or visitors extreme physical and/or emotional distress connected to the colleges’ business operations, which have the potential to significantly disrupt the normal functioning of the educational environment.

The impact of a critical incident can be immediate and requires prompt and effective response measures to address the situation, ensure the safety of individuals involved and minimise any potential long-term consequences on college business operations and affected individuals.

Each critical incident event is unique and will need to be managed as such in alignment with cultural sensitivities and with the [Privacy Act 1988](#), as what is considered a critical incident for one individual may not necessarily be considered a critical incident for another.

5.2 Examples of Critical Incidents

The list below provides examples of critical incidents, but it is not exhaustive. Critical incidents are occasions that meet the definition provided in section 5.1. If you are unsure whether an incident qualifies as critical, please contact your Campus Operations Manager, Head of Operations or the Chief Executive Officer immediately. Refer Appendix A for contact details.

- Death of a student, staff member, or dependent
- Confirmed serious infectious disease or virus
- Serious injury or threats of serious injury requiring emergency medical attention and/or hospitalisation
- Acts of self-harm on campus requiring emergency medical attention
- Events requiring a WorkSafe notification or investigation
- Physical or sexual assault, serious harassment, or domestic or gender-based violence incidents causing death or severe trauma
- Child abuse
- Assaults on campus requiring police attendance
- Acute mental health incidents requiring hospitalisation
- Abduction, kidnapping, or extortion
- Missing student reported to police or with reasonable concern for safety
- Arrest of a staff member or student on campus

- Serious criminal offences with potential imprisonment
- Serious threats of violence or severe verbal aggression
- Armed offender or terrorism event on campus or at third-party providers
- Civil unrest, demonstrations, or protests affecting campus
- Fire, explosion, or bomb threat causing death, injury, or significant property loss
- Natural disasters (e.g., earthquake, flood, bushfire)
- Manmade disasters (e.g., gas leak, structural failure, hazardous material spill)
- Weapon-related incidents or possession of dangerous items on campus
- Hostage situation or siege
- Cybercrime or cyber-attack affecting operations or personal data
- Hate crime or extremist violence targeting the community
- Sexual misconduct allegations posing ongoing risk
- Major utility failure causing safety risks or campus closure
- Transport accidents involving students or staff during provider activities
- Serious incidents during placements, excursions, or provider-managed accommodation
- Whistleblower disclosures involving safety, abuse, or serious misconduct
- Extreme weather or air quality emergencies
- Any other incident posing serious risk to health, safety, wellbeing, security, or operations

While a serious illness or injury may not be deemed a critical incident within a general campus community, it is crucial to recognise the unique dynamics of most international student communities. Given their close-knit nature and the physical distance from familiar support networks, incidents of serious illness or injury can profoundly impact international students. These effects can extend far beyond the individual, often resulting in significant and enduring challenges for students in managing their academic responsibilities.

5.3 Reporting and Responding

- 5.3.1 All internal stakeholders of the colleges must promptly report any potential critical incident to designated authorities, including Campus Operations Managers, Head of Operations, or the Chief Executive Officer.
- 5.3.2 Upon receiving a report, designated personnel will be determined as the coordinating team and initiate an immediate assessment of the situation. The primary goal is to ensure the safety of individuals involved and to implement initial response measures.
- 5.3.3 The colleges will establish a designated Critical Incident Management Team (CIMT) responsible for coordinating and communicating during critical incidents.
- 5.3.4 Clear communication channels will be maintained with relevant authorities, emergency services, and affected individuals.
- 5.3.5 The colleges are committed to ensuring that designated emergency contact persons are notified in a timely, appropriate, and sensitive manner in the event of a critical incident. Contact will be managed by the Student Services Team Leader responsible for the relevant campus. The colleges will respect the privacy and wishes of the affected individual where lawful, and comply with child safety, privacy, and regulatory requirements, including mandatory notification obligations for minors. This commitment

supports clear communication, informed decision-making, and the wellbeing of all affected parties during critical incidents.

- 5.3.6 In the event of a critical incident, the colleges are committed to providing necessary support services, including counselling, medical assistance, and accommodation guidance, to affected individuals.
- 5.3.7 In cases where a critical incident involves an international student, the colleges may request the involvement of a parent, legal guardian, or approved relative to assume care of the student until the situation is resolved.
- 5.3.8 The CEO will notify relevant regulators of any of the following incidents within 14 days of becoming aware of the incident:
 - An investigation into a sexual assault on campus identifies failures in policies and processes designed to protect students.
 - A phishing attack disrupts the colleges' IT systems and key services.
- 5.3.9 The CEO will ensure that relevant staff report allegations, suspicions or disclosures of child abuse to relevant authorities, regardless of whether there is a legal obligation to report. Refer to the colleges' suite of Child Safety policies and procedures available [here](#).
- 5.3.10 The colleges will conduct regular training sessions and awareness programs for staff and students to ensure preparedness and understanding of critical incident management procedures.
- 5.3.11 Thorough documentation and record-keeping of critical incident responses will be maintained for analysis, learning, and future improvements.
- 5.3.12 This policy will be periodically reviewed and updated to reflect changes in circumstances or regulations.
- 5.3.13 Regular reviews and reporting on critical incident data and the effectiveness of response procedures will be conducted, including reporting to the Board of Directors, to identify opportunities for improvement.
- 5.3.14 **All staff are to direct all media inquiries to the Chief Executive Officer. The CEO is the only person who will address the media. The CEO, in consultation with the Board of Directors as required, will determine the official response and liaise directly with the media.**

5.4 International Students under the age of 18

- 5.4.1 When an international student under the age of 18 years is enrolled at the college, compliance with Commonwealth and State legislation regarding child welfare and protection is mandatory, in addition to the requirements outlined in the ESOS Act 2000.
- 5.4.2 The colleges are committed to providing international students with age and culturally appropriate information, including:
 - Emergency contact details, such as those of designated staff member(s).

- Guidance on seeking assistance and reporting incidents or allegations involving actual or suspected sexual, physical, or other forms of abuse.
- 5.4.3 The colleges ensure that all individuals working at campuses where U18 students are enrolled possess the necessary working with children checks and national police clearance documentation, unless exempted under the relevant State or Territory Act.
- 5.4.4 The colleges are committed to maintaining a process for managing emergency situations when welfare arrangements are disrupted for students under 18 years of age. **Refer to section 5.8 of 2.3.8 Welfare Arrangements for International Students Aged Under 18 Policy and Procedure.**

6.0 Procedures

6.1 First-on-scene response

- 6.1.1 Any staff member, student, or visitor who is first on the scene must take the following actions without delay:
- Ensure Safety and Provide Immediate Assistance
 - Take any necessary lifesaving or protective measures
 - Administer first aid if trained, or contact the nearest First Aid Officer (First Aid Officer contact details are displayed alongside evacuation diagrams across each campus).
 - Contact Emergency Services - Call 000 if emergency assistance is required.
 - Notify the Campus Operations Manager and/or Head of Operations.

Refer to detailed steps and procedures for [management of the incident location](#)

6.2 Reporting a critical incident

- 6.2.1 All internal stakeholders of the colleges (students, staff and third-party providers) must report the occurrence of a critical incident as soon as practicably possible.
- 6.2.2 The staff member who first becomes aware of the critical incident must report the incident to the Campus Operations Manager and the Head of Operations (Critical Incident Director - CID) if any of the Campus Operations Managers are unavailable.

Campus Locations	Campus Operations Manager	Phone:
Melbourne Campuses	David Ponce de Leon	0410 607 109
Perth Campus	Michelle Stevens	0499 381 228
Sydney Campuses	Louis Sokota	0410 511 291
Brisbane Campuses	David Ponce de Leon	0410 607 109
Adelaide Campus	Chloe Nguyen	0422 186 722

- 6.2.3 Campus Operations Managers must report the incident immediately to the Head of Operations (CID) and the CEO.

Head of Operations	Craig Jones (Interim)	0451 722 278
Chief Executive Officer	Craig Jones	0451 722 278

- 6.2.4 The CEO will advise the Board of Directors and any other support office staff deemed as required by the CEO.

Refer to the [Appendix 1 – Critical Incident Escalation Flowchart](#)

- 6.2.5 In the event that media becomes involved in relation to a critical incident, please refer to [section 5.3.14](#).

6.3 Establishment of the Critical Incident Management Team (CIMT)

- 6.3.1 The Head of Operations (or where they may be absent, the Campus Operations Manager or CEO) will notify the CIMT and convene a meeting to ensure a coordinated, timely and effective response to critical incidents that affect students, staff, operations and institutional reputation.
- 6.3.2 The team provides leadership, oversight and support consistent with the colleges' Critical Incident Policy and Procedure, regulatory requirements and duty of care obligations.
- 6.3.3 The CIMT is activated for incidents that present significant risk, have potential multi-site or organisational impact, or require executive, regulatory, or external stakeholder engagement. Its role is to ensure consistent decision-making, effective escalation, compliance with legal and regulatory obligations and coordinated internal and external communications.
- 6.3.4 Membership of the CIMT:
- Head of Operations (HOO) – Critical Incident Director (CID)
 - Chief Executive Officer (CEO)
 - Provost or delegate
 - Head of Quality and Risk (HQR)
 - Student Services Manager (SSM)
 - Student Engagement and Wellbeing Team Leader (SEWTL)
 - Campus Operations Manager (COM) (invited as required depending on incident location)

6.3.5 CIMT Functional Roles:

Functional Role	Assigned Position
Critical Incident Director / Incident Controller	Head of Operations
Chair (CIMT)	Head of Operations
Scribe	Campus Operations Manager
Planning & Contingency	Head of Operations
Investigator / Information Gatherer	Campus Operations Manager
Logistics & Operations	Campus Operations Manager

Student Welfare	Student Engagement and Wellbeing Team Leader, Student Services Manager, Provost
Staff Welfare	Chief Executive Officer
Communications / Media	Chief Executive Officer
Specialist Support (Counselling, EAP)	Student Engagement and Wellbeing Team Leader
Legal	Chief Executive Officer
Regulatory Reporting	Head of Quality and Risk

More detail is provided in the [Roles and Responsibilities](#) section.

6.4 Critical Incident Response Coordination

6.4.1 As soon as practicable following the notification of the incident, the Head of Operations will call the initial critical incident response meeting involving the members of the CIMT.

6.4.2 The initial meeting of the CIMT will:

- Establish a clear understanding of the known facts and account for all staff.
- Collate and verify information (e.g., student/staff involved, location, nature of incident, visa status, enrolment status, further potential for harm).
- Plan the immediate response (critical needs such as those severely affected, injuries, missing, unable to get home etc).
- Plan ongoing strategies.
- Allocate individual roles and responsibilities for immediate and ongoing tasks.

6.5 Management of the Incident Location

In the event of a critical incident, the immediate response is crucial for ensuring effective management. Each campus has access to a hard copy of the campus specific emergency plan.

6.5.1 Key Personnel

In the case of emergencies, a predetermined emergency control organisation exists for each campus and includes a Chief Warden (usually the Campus Operations Manager), deputy chief warden, warden and assembly officer. Check the emergency plan in each campus for details of the people assigned to these roles and the responsibilities attached to the role.

6.5.2 Priorities in all Incidents

In all incidents, staff decisions must be guided by the following priorities listed in decreasing order of importance:

- i. Ensure the well-being and safety of individuals in the vicinity.

- ii. Seek aid for casualties by obtaining assistance from trained personnel (First Aiders or Ambulance).
- iii. Safeguard evidence for subsequent investigations.
- iv. Notify the incident following the guidelines outlined in this procedure.

6.5.3 Responding to Incidents without Injury or Illness

- i. Take steps to ensure the incident does not recur or worsen.
- ii. Reporting requirements outlined in 6.6 of this procedure.
- iii. Detail the incident on the college's safety management system.

6.5.4 Responding to Incidents with Injury or Illness

- i. Organise the prompt examination of casualties by a trained First Aider or ambulance.
- ii. First Aider or most senior staff member to assume control of the situation.
- iii. Ensure a person is stationed ready to direct the ambulance to the scene.
- iv. In consultation with conscious casualties:
 - a. Make them comfortable or allow self-administration of treatment if applicable.
 - b. Contact next-of-kin or legal guardian.
 - c. Advise seeking examination by a medical practitioner.
 - d. Provide first aid or transport to medical service if necessary.
 - e. Call an ambulance if deemed appropriate.
- v. If a casualty refuses recommended action due to impaired judgment, take reasonable steps to protect them and others.
- vi. Call an ambulance if a casualty is unconscious.

6.5.5 Responding to Fatal Incidents

- i. Treat the casualty as an injured person if there is any possibility that they may still be alive.
- ii. Call an ambulance.
- iii. Seek assistance for appropriate resuscitation techniques.
- iv. Preserve the incident scene.
- v. Ensure Police have been called.
- vi. Provide access to counselling to students and staff affected by the incident.

6.5.6 Responding to Emergencies

The table below provides instruction for responding to specific emergencies; more detailed information can be found in the campus specific emergency plan document.

Code	Emergency	Action
Red	Fire & Smoke	Remove yourself and others from immediate danger. Alert others. Contain the fire or smoke if safe to do so. Evacuate the area. Extinguish if safe to do so. Await further instructions. Call 000 - Fire Brigade.
Yellow	Internal Emergency (hazardous material incident, services failure)	Remove yourself and others from immediate danger. Alert others. Contain the hazard or isolate if safe to do so. Evacuate the area in danger and get the necessary help. Await further instructions. Call 000 - If Required.
Black	Personal Threat (armed hold up, intruder)	Do not place yourself in further danger (no heroics), remove yourself and others from the scene if possible and get help. Await further instructions. Call 000 - Police.
Purple	Bomb Threat (phone/written threat, suspicious package)	Alert others, remain calm, record information, ask key questions. DO NOT HANG UP THE PHONE even if they have hung up on you. Report and get help. Call 000 - Police.
Orange	Evacuations	Three (3) levels of an evacuation: - Shelter in Place. - Remove from danger, from the impacted fire zone into a non-impacted zone by going through fire doors (partial evacuation). - External evacuation out of the building to the nominated emergency assembly point (full evacuation).
Brown	External Emergency (external hazards or dangers, service failure)	Remain inside if that is the safest place to be, gather personal items, and await further instructions from the Warden in charge. Do not take unnecessary risks. Contact the necessary and appropriate help. Call 000 - If Required.
Blue	Medical Emergency	Notify Warden in charge, commence first aid, alert others and get help "Ambulance - 000". D.R.S.A.B.C.D. Await further instructions. Call 000 - Ambulance.
No Colour	All Clear	When the threat has been mitigated and you have been given the "all clear". This instruction can only come from the Warden in charge or the Emergency Services present.

6.5.7 Evacuating Buildings or Areas

- All occupants, excluding Emergency Control Organisation (ECO) members, will follow the directions of the Warden in charge during evacuations.
- Building occupants, including staff, teachers, students, contractors, service providers, and visitors, must be familiar with the site's emergency evacuation procedures, nearest exits, and primary and secondary emergency assembly points.
- Staff and volunteers requiring assistance during evacuation must have a Personal Emergency Evacuation Plan (PEEP) developed for their work location, forwarded to the Chief Warden.
- Evacuation Types and Levels:

Level One (1) - Shelter in Place / Lock Down (see 6.5.8 for more details)

- Shelter in place or remain in the room, area, or building.
- No immediate evacuation is required.

Level Two (2) - Partial Evacuation

- Minimum evacuation level in the presence of fire or smoke.
- Remove all occupants from the area within the zone impacted by the hazard, remaining inside the premises.

Level Three (3) - Full Evacuation

- Complete evacuation of all occupants from the premises to external emergency assembly points.
- Evacuation prioritises individuals in the most danger, followed by the impacted hazard zone and the remainder of the building.
- Do not return to the premises or grounds until it is deemed safe to do so by the attending Emergency Services and Warden in charge.

6.5.8 Sheltering in Place (Lock Downs)

- i. Any staff member recognising the need for a lockdown must immediately contact the Campus Operations Manager, Head of Operations and Chief Executive Officer using the best available means.
- ii. The Campus Operations Manager will initiate the Lockdown Alarm through various channels, including the public address (PA) system, MS Teams message and email to all staff, and broadcast to all devices by the IT Systems Manager. The PA announcement will consist of a series of bells followed by the directive "Lock Down All Areas" repeated approximately 10 times.
- iii. During Shelter in Place / Lockdown
 - a. On the sound or awareness of an alarm or emergency:
 - Stop all activities immediately.
 - Lock or secure doors.
 - Move away from windows.
 - Turn off lights and any electronic devices.
 - Stay low and quiet.
 - Do not open doors for anyone until notified by the Warden to do so.
 - Await further instructions from the Warden in charge.
- iv. Shelter in Place / Lockdown Levels:
 - a. Level One (1) Full Lockdown
 - Occupants remain inside their current location.
 - Close and lock doors securely if possible, barricading if necessary.
 - Turn off lights and remain quiet.
 - Avoid using mobile devices or making unnecessary noise.
 - v. Level Two (2) - Partial Lockdown

- Applicable when there is a potential threat in a specific area.
- Movement within the building is restricted, and occupants should stay inside secure areas.
- Follow instructions from the Warden in charge.

6.5.9 Responding to allegations, suspicions or disclosures of child abuse

- i. **Refer to the AE / Stott's College Child Safety policies and procedures, including the following:**
 - a) VCE1.0 Child Safety and Wellbeing Policy
 - b) VCE-CC-03 Child Safety Code of Conduct
 - c) VCE-GUI-06 Guidelines to responding to incidents, disclosures and suspicions of child abuse

6.5.10 Managing emergency situations when welfare arrangements are disrupted for students under 18 years of age

- i. **Refer to section 5.8 of:**
 - a) 2.3.8 Welfare Arrangements for International Students Aged Under 18 Policy and Procedure

6.6 Critical Incident Follow Up

6.6.1 The Head of Operations convenes a follow-up meeting with the CIMT formed during the initial response.

6.6.2 The Head of Quality and Risk or their delegate must be included in this meeting.

6.6.3 The meeting addresses the following issues related to the critical incident:

- Conducting debriefing sessions for staff and students, providing accurate information.
- Identifying individuals needing support services among staff and students.
- Identifying other affected individuals and ensuring their access to necessary support services.
- Organising a suitable memorial service.
- Monitoring the progress of affected individuals, especially staff and students, for signs of delayed stress or post-traumatic stress disorder.
- Managing long-term consequences, such as involvement in inquests and legal proceedings.
- Devise a communication plan to all internal and external stakeholders, including media where necessary/appropriate.

6.6.4 The CIMT will discuss comprehensive information regarding the incident to ensure the Campus Operations Manager can complete a thorough critical incident report.

- 6.6.5 The Head of Quality and Risk will initiate a continuous improvement process, integrating lessons learned from the incident into AE's risk management plan and policy framework to enhance overall preparedness.
- 6.6.6 The Head of Quality and Risk will report the incident, including a copy of the incident report, to the RCC to ensure the development and implementation strategies to mitigate immediate and future risks associated with the incident. This may involve recommended changes in procedures, training programs, or infrastructure improvements.

6.7 Documenting and Reporting on Critical Incidents

- 6.7.1 All critical incidents must be documented promptly and comprehensively. Accounts are likely to be more accurate if they are completed as soon as possible after the incident's occurrence.
- 6.7.2 The Head of Operations is responsible for ensuring that incidents are adequately documented, while Campus Operations Managers are tasked with creating incident reports in the colleges' safety management system.
- 6.7.3 Details to be recorded in the incident report include:
- i. Incident Information:
 - Type of incident.
 - Campus/Person(s) affected/Activity.
 - Location where the incident/event occurred.
 - Date and time of the incident/event.
 - Environmental conditions present during the incident.
 - ii. Provide a specific and detailed account of what happened, including the factors that led to the incident and any foreseeable follow-up actions.
 - iii. Where photos are available, upload images that enhance the narrative, providing a clearer understanding of the incident's context.
 - iv. Document the immediate actions taken and measures implemented to minimise the risk of further damage or recurrence of the incident.
 - v. Outline any suggested further remedial actions for rectifying the incident, preventing future occurrences, or minimising harm.
 - vi. On submission of the report a PDF copy of the incident must be generated and sent to the Head of Risk and Compliance for their records.
 - vii. The CEO to provide a report to the relevant education regulatory authority within 14 days of a notifiable critical incident.
- 6.7.4 The Head of Operations will provide periodic reports to the Board of Directors (and relevant sub-committees where required) on critical incident summary data. Reports must go to the RCC every quarter and is reported, even if there have been no incidents.

6.8 Incident Closure and Record-Keeping

- 6.8.1 An incident is considered closed when all support needs have been addressed, corrective or preventive actions have been implemented, and external reporting has been concluded.
- 6.8.2 The CIMT must close all critical incidents.

6.9 Useful Resources

[ISANA Critical Incidents Kit](#)

7.0 Roles and Responsibilities

Board of Directors

- Receive reports on notifiable critical incidents and critical incident trends.
- Provide governance oversight and ensure appropriate corrective and preventive actions are implemented.

Risk and Compliance Committee

- Monitor and review risks arising from critical incidents and recommend improvements or corrective actions where required.
- Receive and review quarterly critical incident summary reports, evaluate trends and systemic issues, and assess their implications within the broader institutional risk profile and risk register.
- Monitor compliance with relevant legislation and regulatory obligations in the management and reporting of critical incidents.
- Review internal and external audit findings related to critical incident management and ensure agreed actions are implemented.

Chief Executive Officer (CEO)

- Provide executive leadership during critical incidents.
- Notify relevant regulators of notifiable critical incidents within required timeframes.
- Ensure allegations, suspicions, or disclosures of child abuse are reported to relevant authorities.
- Oversee communications with regulators, media, and external stakeholders as required.
- Ensure staff welfare considerations are addressed.

Head of Operations (HOO) - Critical Incident Director (CID)

- Act as the Critical Incident Director and Chair of the Critical Incident Management Team (CIMT).
- Lead and coordinate the immediate and ongoing response to critical incidents.
- Convene and chair CIMT meetings and allocate roles and responsibilities.
- Ensure emergency response actions prioritise safety, welfare, and duty of care.
- Ensure incidents are documented, escalated, and closed appropriately.

Campus Operations Managers

- Act as the first point of escalation for reported critical incidents.
- Ensure immediate safety measures are implemented at the incident location.
- Notify the Head of Operations and CEO without delay.
- Manage campus-level emergency responses in line with emergency management plans.
- Complete and submit incident reports in the safety management system.
- Support operational logistics, information gathering, and incident documentation.

- Act as scribe and investigator/information gatherer for CIMT as required.
- Assist with site management and coordination during incidents.

Critical Incident Management Team (CIMT)

- Provide coordinated leadership, decision-making, and oversight during critical incidents.
- Assess risks, verify information, and plan immediate and ongoing response strategies.
- Ensure compliance with legal, regulatory, child safety, and duty-of-care obligations.
- Coordinate internal and external communications and stakeholder engagement.
- Ensure appropriate student and staff support services are activated.

Head of Quality and Risk (HQR)

- Oversee regulatory compliance and reporting related to critical incidents.
- Participate in post-incident reviews and continuous improvement processes.
- Report incidents and recommendations to the Risk and Compliance Committee (RCC).
- Ensure lessons learned are integrated into risk management and policy frameworks.

Student Services Manager (SSM)

- Coordinate student welfare responses during and after critical incidents.
- Ensure affected students access appropriate support, accommodation, and services.
- Liaise with parents or guardians where required, particularly for students under 18.

Student Engagement and Wellbeing Team Leader (SEWTL)

- Provide or coordinate counselling and specialist wellbeing support.
- Support students affected by trauma, stress, or critical wellbeing issues.

Provost (or Delegate)

- Support academic and student welfare decision-making during critical incidents.
- Ensure academic considerations for affected students are appropriately managed.

Staff, Contractors, Students, and Third-Party Providers

- Immediately report actual or suspected critical incidents to Campus Operations Managers or the Head of Operations.
- Follow emergency instructions and cooperate with response measures.
- Comply with child safety, privacy, and reporting obligations.

Parents, Guardians, and Approved Relatives (Under 18 Year Old Students)

- Be notified and involved in critical incidents affecting students under 18 years, where appropriate.
- Assume care of the student when required by the colleges.

8.0 Definitions

Term	Definition
Abduction / Kidnapping / Extortion	Unlawful act of forcibly taking or holding someone against their will for ransom or other unlawful purposes.
Acute Mental Health incident	A sudden and severe episode or situation related to mental health.
Armed offender or terrorism	Incidents involving individuals with weapons or acts of violence intended to cause fear or terror.
Arrest	The act of being taken into custody by law enforcement due to alleged criminal behaviour.
Assault	A physical attack on an individual resulting in harm or threat of harm.
Civil Unrest	Widespread social or political turmoil, often leading to public protests or disturbances.
Critical Incident	A traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear, injury, or significant disruption to the colleges' operations, and requires an immediate and coordinated response to ensure safety, welfare, and compliance obligations are met.
Critical Incident Director	The authorised incident lead responsible for directing and coordinating the overall response to a critical incident, activating and chairing the CIMT, allocating responsibilities, and ensuring duty of care, compliance, documentation, and closure requirements are met.
Critical Incident Management	The process and procedures for addressing and responding to significant and unexpected events.
Critical Incident Management Team	A designated group of senior staff convened to coordinate, manage, and oversee the response to a critical incident, including decision-making, communication, escalation, regulatory reporting support, and post-incident review activities.
Criminal activity	Unlawful actions or behaviours that violate the law.
Death	The cessation of a person's life.
Demonstration	Public displays or protests, often related to social or political issues.
Duty of Care	A legal and ethical responsibility requiring the colleges to take reasonable steps to protect the health, safety, and wellbeing of students, staff, and others impacted by the colleges' activities, services, and learning environments.
Education Outside of the Classroom Incident	An event related to educational activities conducted outside the typical classroom setting.
Emergency Services	Government emergency response agencies that may attend or provide assistance during an emergency, including police, ambulance, fire services, and relevant state emergency services.
Fire	A destructive event where flames consume property or the environment.
International Student (Under 18 Years)	An overseas student who is under 18 years of age and enrolled under the ESOS framework, requiring approved welfare and accommodation arrangements and additional child safety and guardian notification considerations.
Manmade hazard (e.g., gas leak)	Catastrophic events caused by human actions or errors, like industrial accidents or chemical spills.
Missing student	A situation where a student's whereabouts are unknown or unaccounted for.

Natural hazard (e.g., earthquake)	Sudden and severe environmental events, such as earthquakes, floods, or hurricanes.
Notifiable Critical Incident	A critical incident that must be reported to an external authority or regulator under relevant legislation or regulatory requirements (e.g., WorkSafe, police, child protection, TEQSA/ASQA/VRQA obligations, or ESOS/National Code requirements), within required timeframes.
Notifiable to WorkSafe	Refers to incidents or events that are legally required to be reported to the appropriate workplace safety authority.
Pandemic	A global outbreak of a contagious disease that affects a large population.
Safety Management System	The colleges' designated system for recording, tracking, and reporting incidents, hazards, actions, and outcomes, including the generation and retention of incident reports and supporting documentation.
Serious illness	A severe medical condition that significantly affects a person's health.
Serious injury	A substantial physical harm or trauma to a person.
Sexual Harassment	Unwanted and inappropriate sexual advances or behaviour.
Shelter in Place / Lockdown	A protective response measure requiring occupants to remain in a secure location, restrict movement, and follow warden instructions to reduce risk during a threat or emergency where evacuation is unsafe or inappropriate.
Stakeholders	Individuals or organisations involved in, affected by, or responsible for aspects of student education, welfare, support, accommodation, or operations, including students, staff, contractors, agents, volunteers, homestay hosts, third-party providers, placement hosts, regulators, and emergency services.
Threats of Violence	Expressions or indications of a willingness to cause physical harm or injury.

9.0 Related Documents

UP Education: Appendix A: Incident Management Checklist
AE Organisation Wide Contacts
Health and Safety Policy
UP Education Group Information Security Policy
UP Security Incident Response Plan
Preventing and Responding to Sexual Assault and Sexual Harassment (SASH) Policy
Preventing and Responding to Sexual Assault and Sexual Harassment (SASH) Procedure
Privacy Policy
Student Support Policy
2.3.8 Welfare Arrangements for International Students Aged Under 18 Policy and Procedure
VCE1.0 Child Safety and Wellbeing Policy
VCE-CC-03 Child Safety Code of Conduct
VCE-GUI-06 Guidelines to responding to incidents, disclosures and suspicions of child abuse
2.3.4 Student Health and Wellbeing Strategy
6.2.10 Management of Risk
6.2.4 Risk Appetite Statement
6.2.7 Business Continuity Policy
6.2.6 Business Continuity Plan

10.0 Relevant Legislation

Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)
Higher Education Standards Framework (Threshold Standards) 2021
Standards for Registered Training Organisations (RTOs) 2025
Education and Training Reform Regulations 2017 (Victoria)
Education Services for Overseas Students (ESOS) Act 2000
National Code of Practice for Providers of Education and Training to Overseas Students 2018
ELICOS Standards 2018
Privacy Act 1988 (Commonwealth)
Relevant Work Health and Safety Act and OHS Act and regulations
Modern Slavery Act 2018 (Commonwealth)
Ministerial Order 1359 Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises
Victorian Registration and Qualifications Authority (VRQA) Minimum Registration Requirements
National Higher Education Code to Prevent and Respond to Gender-based Violence 2025

11.0 Document Information

Document name:	Critical Incident Policy and Procedure
Document number:	6.2.3
Purpose:	The purpose of this policy is to establish procedures for recognising, responding to, and managing critical incidents that may significantly disrupt normal operations and impact students and the institution, while ensuring effective communication and support in such situations.
Audience:	All the buildings occupants including but not limited to staff, students, contractors, service providers, and visitors to AE.
Category:	Corporate Monitoring and Accountability
Subcategory:	Governance and Accountability
Initial approval:	22/01/2024
Date of last approval:	19/02/2026
Next review date:	19/02/2028
Policy advisor:	Head of Operations
Approving authority:	Board of Directors
Contact	Regulatorcompliance@ae.edu.au

12.0 Change Log

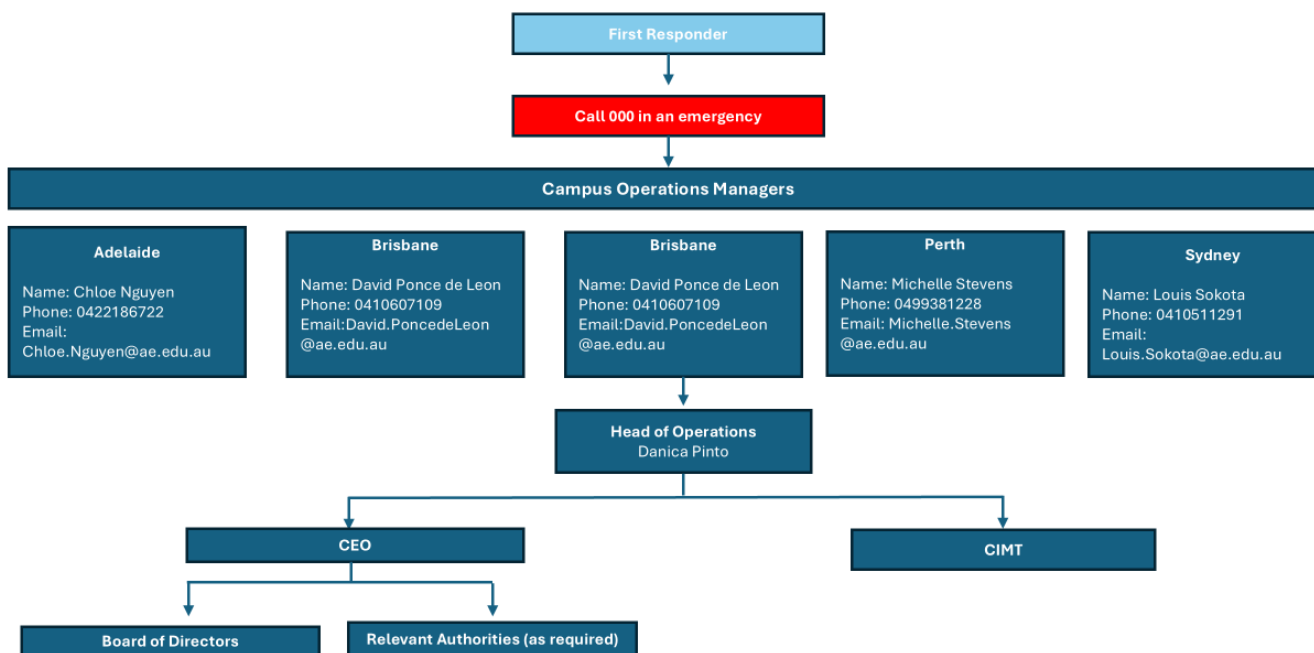
Date	Version	By	Notes
28/10/2023	2.2	Dean Narelle Whatley	UP Education's Policy adopted to unify processes within the Group. Updated Policy template and branding
02/01/2024	3	Dean Narelle Whatley	Added SAFE 365 processes. Added regulatory context, scope, definition and related documents section. Added guiding principles and major re-write to policy content and procedures section. Updated new positions Head of Operations, Head of Compliance, Campus Managers.

12/05/2024	3.1	Head of Risk and Compliance	Updated perishable data including contact details and role titles. Provide additional detail around examples of critical incidents.
28/01/2026	4	HQR	• Complete overhaul of policy and procedures • Consolidation of AE and ICHM Critical Incident Policy and Procedures • Reorganising of policy and procedure sections • Strengthened rationale and broadened scope • Added explicit reference to VRQA minimum registration requirements • Refreshed definitions throughout • formalised a single, controlled media response process, ensuring that all media inquiries are centrally managed by the CEO, with official messaging determined in consultation with the Board where required. • Expanded examples of critical incidents • Updated names, positions and contact details • Strengthened emergency contact requirements • Included Child Safety references and emphasised mandatory reporting obligations • Updated review and improvement requirements • Included specific requirements relating to overseas U18 students • Included relevant cross-referencing and hyperlinks to related documents • Refined 'first-on-scene' steps • Updated CIMT functions • Added specific references to relevant policies and procedures for responding to allegations, suspicions or disclosures of child abuse and managing emergency situations when welfare arrangements are disrupted for students under 18 years of age • Updated reporting requirements • Updated roles and responsibilities section • Added Useful resource – ISANA Critical Incidents Kit • Updated related documents and relevant legislation • Developed Appendix A – Critical Incident Escalation Flowchart
05/03/2026	4	HQR	• Addressed Board feedback from 19/02/2026 - Adding National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 to Regulatory Context and relevant legislation sections and including GBV incidents causing death or severe trauma to list of examples of critical incidents. • Addressed Board feedback from 19/02/2026 - Added to 6.7.4 that critical incident summary reports must go to the RCC every quarter and is reported, even if there have been no incidents. • Addressed Board feedback from 19/02/2026 - Added RCC responsibilities to roles and responsibilities section.



Appendix 1 – Critical Incident Escalation Flowchart

Appendix 1 – Critical Incident Escalation Flowchart



NOTE: This flowchart shows the key escalation points of authority for critical incidents only. It does not capture all required communications or notifications, which will vary according to the nature and circumstances of each incident and will be determined by the Critical Incident Management Team (CIMT).