

PROCEDURE C20.3-P20.3

CRITICAL INCIDENT MANAGEMENT

1.0 INTRODUCTION

1.1 Related Policy

Critical Incident Policy

1.2 Purpose

The purpose of this procedure is to outline the responsibilities and processes for managing a critical incident, crisis, or emergency event, irrespective of where the incident occurs across the Scentia Group and Third-party Partners (TPPs), including in association with a student's learning and assessment.

1.3 Scope

This procedure applies to all students and workers of the Scentia Group and TPPs. As some courses provided by the Scentia Group and TPPs are offered online, this procedure also applies to critical incidents that may occur while the student is studying online. It also applies to critical incidents happening during an ACHW student's attendance at clinics.

Where injury or illness is sustained during, or as a result of, a critical Incident, the Health, Safety and First Aid in the Workplace Policy and Procedure also apply.

1.4 Scope Exceptions

This procedure does not apply to incidents not considered to be critical. Non-critical incidents (refer Definitions) are handled in accordance with relevant Policies and Procedures.

2.0 RESPONSIBILITIES

1. The Chief Executive Officer (CEO), of Scentia Group, has overall responsibility for ensuring that each education provider of the Scentia Group and their Third-Party Partners have a nominated staff member responsible for managing critical incidents in line with this Policy and that recommendations from reviews of critical incidents - simulated or real- are actioned.
2. The Chief Executive Officer, Scentia, is responsible for Scentia's Critical Incident Management Team (CIMT) which includes the CEO, the Chief Finance Officer, the Head of People and Culture and the Executive Directors.

3. The CIMT is responsible for overseeing the management of a critical incident, reviewing reports on critical incidents, making recommendations for improvement, and overseeing the implementation of the Business Continuity Plan.
4. The CIMT and Scentia Group workers are responsible for the actions attributed to them, in this Procedure.
5. TPP's are responsible for ensuring their Crisis Management/Critical Incident Management Policy and Procedure matches that of Scentia's and to provide a copy to the relevant Executive Director.
6. The Executive Directors of each respective Scentia Group education provider are responsible for managing critical incidents relating to the students of each respective area. The Executive Director, ACHW, is responsible for managing critical incidents that occur at clinic spaces.
7. The Campus Managers are responsible for managing critical incidents that occur on the premises of Scentia campuses.
8. The Chief Sales Officer is responsible for managing critical incidents that occur on the business premises of TLS clients.
9. Staff responsible for managing critical incidents are responsible for doing so in line with this Policy and Procedure, (and the Health, Safety and First Aid in the Workplace Policy and Procedure, where required), directions by the CIMT, and directions by emergency services as required.
10. The Head of People and Culture are responsible for ensuring the contact details on all emergency procedures and plans distributed on campuses, websites and other sites are reviewed and revised annually and when contacts change.
11. The Executive Directors are responsible for ensuring that the induction program for all students includes familiarisation with the Critical Incident Policy and Procedure, how to report an emergency, and how to respond to an emergency situation.
12. The Head of People and Culture is responsible for ensuring that the induction program for all staff includes familiarisation with the Critical Incident Policy and Procedure, how to report an emergency, and how to respond to an emergency situation.
13. The ACHW National Clinic Supervisor is responsible for ensuring that students attending clinics are inducted to the clinic's critical incident/WHS policies and procedures.
14. If the critical incident occurs in a clinic, the ACHW Facilitators are responsible for supporting and assisting ACHW students present at the clinic.
15. The CEO or Chief Marketing Officer are responsible for managing interaction with the media during and after a critical incident, if required.
16. Student Services is responsible for providing support to students involved in, or affected in any way by, a critical incident or referring students to appropriate services.

17. The Head of People and Culture is responsible for providing staff with access to the Employee Assistance Program (EAP) for any counselling support required.
18. All Scentia Group and TPP staff and students are responsible for complying with their health and safety responsibilities as defined by the Work Health and Safety Act 2011 and the Health, Safety and First Aid in the Workplace Policy and Procedure.

3.0 PROCEDURE

3.1 Critical Incident Management

1. Planning, assessment and mitigation of risk
 - a. Critical incident management is reviewed as part of future planning, discussed to ensure resources are allocated in budgets for possible scenarios, and tabled for discussion at meetings of the relevant Corporate Board.
 2. The CIMT develops Scentia's Business Continuity Plan, with feedback from the Executive Directors, and Head People and Culture, and any other nominated staff member responsible for managing critical incidents relating to their area.
 - a. The CIMT meets annually to review and update the Business Continuity Plan, and to assess the adequacy of the existing system and resources.
 - b. The nominated staff member ensures information about personal security and emergency contact numbers for their area are accurate and published on the website and Employment Hero. The nominated staff members managing critical incidents must check the currency of contact details on these at least annually and ensure contacts are updated as required.
 - c. The Head of People and Culture ensure that Emergency Procedures and Evacuation Plans are prominently displayed in the common areas and corridors of all Scentia Group members and TPPs, and on websites and staff portals.
 - d. Nominated staff conduct regular assessments of Scentia owned premises to assess risk to staff and students. If premises are used after hours, the assessment includes an after-dark check to ensure there is adequate lighting and to identify any risk areas. The outcome of these assessments is reported to the WHS Committee.
 - e. Cash is not kept on premises and notification of such is visible to the public.
 3. Classification of incidents
 - a. The Scentia Group classifies incidents as shown in Table 1:

Classification	Impact	Relevant Policy/Plan
Minor Incident	<p>Can be contained in-house.</p> <p>Minor injury to one person may be sustained.</p> <p>Low financial losses may be incurred.</p> <p>No impact on operations.</p>	<p>Health, Safety and First Aid in the Workplace Policy and Procedure if injury or illness is sustained.</p>
Moderate Incident	<p>Requires containment with external assistance (for example, emergency services).</p> <p>Injury to one person may be sustained and require external assistance.</p> <p>May result in moderate financial loss.</p> <p>May be a moderate impact on operations for a short time.</p>	<p>Health, Safety and First Aid in the Workplace Policy and Procedure if injury or illness is sustained.</p> <p>Business Continuity Plan.</p>
<p>*Critical Incident</p> <p>*Note: an incident classified as major is viewed as a critical incident</p>	<p>May involve death and/or very serious or significant numbers of injuries, and cause stress and fear.</p> <p>May result in major damage to infrastructure and/or the environment.</p> <p>May impact severely on operations, possibly for a considerable duration.</p> <p>May result in high financial losses and may cause possible or actual reputation loss.</p>	<p>Critical Incident Policy and Procedure</p> <p>AND</p> <p>Health, Safety and First Aid in the Workplace Policy and Procedure if injuries or death result from the incident.</p> <p>Business Continuity Plan</p>

Table 1: Classification of Incidents

4. Reporting a critical incident

a. Onsite

- i. A worker first on the scene of the incident must assess the level of the incident and respond accordingly noting whether the incident is minor, moderate, or critical. Response may include notifying emergency services and, where possible, removing workers and students from the area.
- ii. Once the safety of any workers or students involved in a critical incident is secured, the worker first on the scene must contact the nominated staff member who will notify the CEO.
- iii. The CEO will contact the CIMT members.
- iv. Where the critical incident occurs on Scentia Group premises (including Room Hire premises), the staff member first on the scene must contact security personnel in the relevant building and the nominated staff member.
- v. The nominated staff member, and the CIMT, will take over managing the critical incident and ensure appropriate resolution.

- b. Online environment
 - i. A worker who becomes aware of an incident in the Scentia Group online environments must immediately report it to the nominated staff member who will notify the CEO, the Head of IT, and the relevant education brand Executive Director.
 - ii. The nominated staff member, the Head of IT (and the CIMT if required) will take over managing the critical incident and ensure appropriate resolution.
 - iii. The Scentia IT team will take appropriate action on the Scentia Group online environments.
- c. After hours - if at a clinic, the clinic Facilitator will respond appropriately. Otherwise, workers and students should contact emergency services directly on 000.

5. Critical Incident response teams

- a. The Critical Incident Management Team (CIMT), composed of senior managers, provides governance of and strategic input to crisis/emergency management and business continuity, and, where required, responds to critical incidents with support from the nominated staff.
- b. The nominated staff members provide operational support and management of the critical incident.

Incident	Response
Health and Safety minor	Refer to the Health, Safety and First Aid in the Workplace Policy and Procedure
Health and Safety moderate	Refer to the Health, Safety and First Aid in the Workplace Policy and Procedure
*Critical incidents	Lead: CIMT
*NOTE: All major incidents are considered to be critical	Support and operational management: Nominated Staff Member

Table 2: Critical Incident Response teams

6. Emergency assistance and communication

- a. Any student or worker who requires immediate emergency assistance can call emergency services directly by dialling 000 or contact Student Support or Security as outlined in the Emergency Procedures for each area and online.
- b. The CIMT and/or the nominated staff member managing the incident contacts the relevant people/services required (the order will be determined by the specific circumstances):
 - i. Police, Fire Brigade, Ambulance and/or other emergency service on 000 - if necessary, liaise with the Police regarding notification to the student or staff member’s family and other relevant matters.

- ii. Next of Kin/Emergency Contact - ensure that the next of kin are informed and updated on the current situation and that the Scentia Group will arrange or provide support to them. If a student or staff member is in hospital or critically ill, appropriate transportation or accommodation may be arranged for members of the family.
 - iii. Other Participants/Students/Visitors/Staff - identify those individuals who are closely involved with the student, ensuring that these people are aware of the support within and outside of Scentia and encourage them to keep in contact with Scentia Group.
 - iv. Hospital - if necessary, contact the hospital students and/or staff have been taken to, to arrange any relevant matters.
 - v. Counselling -
 - If the affected person is a student, contact Student Support.
 - If the affected person is an academic worker, contact the Executive Director for the respective education brand.
 - If the affected person is a non-academic worker, contact the Head of People and Culture.
 - For both, advise on the appropriateness and availability of counselling and debriefing sessions for individuals and groups of students, participants, and staff or to facilitate to referral to an external provider as required.
 - vi. Legal Advice - help students or staff to obtain legal advice, if needed.
7. If the critical incident involves a crime, where possible the nominated staff member must protect the scene from any unnecessary foot traffic or other possible contamination until the police take over.
 8. If the critical incident occurs in a clinic, the ACHW onsite staff lead students to safety as required by the clinic owners and/or emergency services.

3.2 Support through an Emergency Situation or Critical Incident

1. Debriefing immediately after a critical incident can be offered to students and staff by the designated staff member or a member of the CIMT.
2. Where a student is directly affected by a cyber incident, they should contact Student Services to discuss and arrange the help available.
3. Where a student has been affected by events in general that has caused widespread trauma, they should seek help through Student Services.
4. All students requiring assistance in dealing with a critical incident or emergency situation can also seek immediate, confidential counselling services, arranged by the Student Support team, using internal resources or external experts regardless of whether such an incident relates to their study.

5. Staff requiring assistance in dealing with a critical incident or emergency situation can seek immediate, confidential and free-of-charge support from the Employee Assistance Program (EAP), regardless of whether such an incident relates to their work. Details of the EAP provider are held on Employment Hero or can be requested from their managers.

3.3 Recording and reviewing a Critical Incident

1. Where a critical incident involves the health and safety of workers and students, the recording and reporting requirements detailed in the Health, Safety and First Aid in the Workplace Procedure are also required. This includes recording of the critical incident on the registers used for recording any incident, i.e, the Student Incident Register and/or the Work Health and Safety Hazard, Incident Register - see the Health, Safety and First Aid in the Workplace Procedure - and include all details of the critical incident and the impacts. The Register is annually reported to the Corporate Board.
2. Where students and/or workers suffer injury, details are also recorded on the student and/or staff record.
3. The nominated staff member, or delegate, will conduct an investigation within 24 hours of the incident to record factual data, including what happened, when, where, and possible cause. A report is provided to the CIMT.
4. A formal review/debriefing after a critical incident will be conducted by the CIMT within ten (10) business days of the incident and include the nominated staff member and other relevant workers. A report will be provided to the following, with a request for comment and recommendations:
 - the WHS Committee if the incident resulted in, or had the potential to resultant in, injuries or illness; and
 - The Audit & Risk Committee if the critical incident had other elements, such as an element of real or potential financial risk or reputation risk; and
 - the Teaching and Learning Committee if there has been an impact on teaching and learning.
5. Recommendations from these committees will be provided to the CIMT and collated into a combined report from the Executive Director or other delegated staff member to the relevant Corporate Board, with a request for recommendations on future management.
6. Recommendations made by the Corporate Board will include:
 - whether such an incident is avoidable in the future;
 - the steps and resources needed to achieve that; and/or
 - how the Scentia Group can better prepare for, respond to, and support their students and staff during and after such incidents.

7. The Corporate Board's recommendations are actioned by the Executive Director/designated staff member and others as relevant and overseen by the Board.

3.4 Training and induction

1. The CIMT ensures that nominated staff members are trained in all aspects of crisis management and have their training renewed every third year.
2. The Executive Directors or delegates ensure that the orientation program for students includes how to report an emergency and how to respond to an emergency situation.
3. The Head of People and Culture or delegate ensures that the staff induction program includes the Critical Incident Policy and Procedure, how to report an emergency, and how to respond to an emergency .
4. The ACHW National Clinic Supervisor ensures that clinic facilitators and students in external clinics are inducted to the clinic's emergency procedures.
5. Clinic facilitators go through emergency procedures with students at the commencement of each clinic.
6. Simulated Critical Incident drills, including emergency evacuations, are conducted annually by the Campus Managers at each campus/site on a schedule established by the CIMT or building management.

4.0 DEFINITIONS

- **Crisis** - a time of intense difficulty, trouble or danger; a time when difficult decisions must be made; any incident or period that will lead, or may lead, to an unstable and dangerous situation affecting an individual, group, or all of society.
- **Critical Incident** - an adverse incident, or series of events that have the potential to seriously damage an organisation's people, operations, or reputation; a traumatic incident or threat of such which causes extreme stress, fear, or injury.
- **Emergency** - a sudden, unexpected incident that requires an immediate response from internal or external emergency services.
- **Incident** - an individual occurrence or event that is out of the ordinary.
- **Non- Critical Incident** - An event which is unanticipated or outside the accepted social norm, but which, in the experience of the general community, would not be considered an extraordinary occurrence or situation. A non-critical incident may be treated as a Critical Incident if it may result in serious harm or poses a real threat to property or individuals. Examples include but are not limited to:
 - accident or injury
 - harassment
 - bullying
 - misconduct
 - sexual harassment

- racism
 - conflict
 - theft
 - brief interruption to the supply of a utility
 - first aid
 - minor flooding
 - minor property damage
- **Scentia Group** - The Scentia Group ('the Group'), consists of the Australasian College of Health and Wellness Pty Ltd (ACHW), the Australian Institute of Management Education and Training Pty Ltd (AIM) operating as AIM Business School (ABS), and the Australian Institute of Management (AIMVET), a Registered Training Organisation (RTO).
 - **Workers** - are defined in the Work Health and Safety Act 2011 (C'wealth) as those who 'carry out work for a person conducting a business and include employees, contractors, agency staff, labour hire staff, people on work experience, sub-contractors, trainees, volunteers and out-workers'.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- [All relevant national and/or state legislative instruments that stipulate requirements with which organisations are obligated to comply related to Emergency Management, Crisis Management, Critical Incident, Workplace Health and Safety.](#)
- Business Continuity Plan
- Critical Incident Policy
- Health, Safety and First Aid in the Workplace Policy and Procedure
- Student Incidents Register
- Work Health and Safety Act 2011
- Incident Register
- Privacy of Staff Information and Records [Policy](#)
- Privacy of Student Information and Records [Policy and Procedure](#)
- Sexual Assault and Sexual Harassment Prevention and Response (Students and Staff)
- Risk Management Policy

6.0 POLICY/PROCEDURE OWNERSHIP

Policy Owner	Chief Executive Officer
Status	Reviewed on October 2024
Approval Authority	Scentia Corporate Board, with endorsement by ACHW and AIM Corporate Boards
Date of Approval	29 October 2024
Effective Date	11 November 2024
Implementation Owner	Head of People and Culture
Maintenance Owner	Head of Compliance
Review Due	October 2027
Content Enquiries	Liz Douglas - Head of People and Culture Email: ldouglas@scentia.com.au

7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C20.0-P20.0	10 July 2017	Head of Compliance / Director ACHW	Initial document review after purchase of MHMHE
C20.1-P20.1	10 March 2020	Academic Board	General Review
C20.2-P20.2	21 October 2021	Director of Education	New template. Procedure separated from policy. More detail in procedure. Scentia version and ACHW and ABS versions combined to make one corporate procedure for the Scentia Group.
C20.3-P20.3	29 October 2024	Head of Compliance	Minor edits to improve clarity and updated to reflect changes in business titles. Addition of definition of non-critical incidents.