

SGA Critical Incidents Policy and Procedures

1. Purpose

This policy and its procedures cover the management of critical incidents involving any enrolled student. It is intended to reduce the impact of critical incidents that can affect a student's ability to undertake or complete their studies, such as incidents that may cause physical or psychological harm.

2. Scope

The policy and its procedures apply to students in courses delivered by Study Group Australia Pty Limited (SGA), and to staff and affiliates at its Colleges. It sets out the steps to be taken in the event of a critical incident involving one or more students.

The procedures apply to any critical incident involving an enrolled student in connection with their study at a College:

- for up to four weeks prior to the commencement of their first term of study, providing the student is travelling to or has arrived in Australia;
- for the duration of their enrolment, including when residing outside Australia and engaging in remote learning or other course activity, and
- for students who remain in Australia following the end of their final term of study with the College and are:
 - under the age of 18: from the end of their final term of study until the day before they commence studies with the College again or at a Study Group University partner provider, or
 - aged 18 or over: for two weeks after the end of their final term of study, or until the day before they commence studies with the College again or at a SGA University partner provider, whichever occurs first.

3. Policy principles

SGA will implement this policy and procedures for managing critical incidents.

In the event of a critical incident or crisis, SGA will ensure the matter is appropriately investigated, escalated and managed in a timely and responsible manner.

SGA will make information available (see Appendix A) to students about how to seek assistance for and report an incident that significantly impacts on their wellbeing, including by making this policy available on College websites, and during enrolment and orientation.

4. Procedures

4.1 Immediate response and reporting of a critical incident

The First Responder will take all reasonable steps to secure the immediate safety and welfare of the affected student(s). All critical incidents must be reported immediately, and in any event within the first 24 hours, to:

- the College Director or delegate, or
- the College emergency phone line (refer to Appendix A).

External emergency services should be called where appropriate using the 000 service, and on campus security services should be called where appropriate (refer to Appendix A).

Additional contact details for emergency and ongoing support and assistance for students affected by critical incidents are set out in Appendix A.

The Case Manager is the College Director or delegate who is responsible for implementing the College response to a critical incident.

The Case Manager will immediately notify the Head of International Study Centres at SGA, other relevant SGA executive staff member(s), SGA Public Relations/Communications, and the SGA Compliance team of any critical incident that:

- is or may become a notifiable incident
- involves multiple students or staff
- requires access to emergency funds, or
- is reported in the media or otherwise attracts a large amount of attention or publicity.

Where an incident is notifiable to SafeWork NSW or WorkSafe ACT, after completing the above reports, the Case Manager is responsible for:

- immediately notifying the relevant regulator of any notifiable incident. Incidents can be notified 24/7 by calling 13 10 50 (NSW) or +61 2 6207 3000 (business hours) or +61 419 120 028 (after hours) (ACT)
- preserving the incident site pending further direction from authorities
- recording the incident in the critical incident register
- reporting incidents that occur on campus, or while a student is studying remotely in Australia during a class, through the SGANZ Safety Portal, and
- notifying SGA's insurer.

Where an incident has been reported in the media, including in social media or other public information sources, the Case Manager will inform relevant personnel in SGA Public Relations/Communications, who will issue any required response to the media.

The Case Manager, upon notification and within 24 hours of receipt, will oversee the process of gathering information to:

- determine the nature of the incident and known facts
- identify the affected student(s) and determine their current location
- arrange required medical treatment and counselling for the affected student(s), and
- inform any next of kin as required.

The Case Manager will advise relevant personnel of the appropriate University partner of a critical incident as early as practicable, or in any event within 48 hours after becoming aware it has happened. Information about the incident or the affected student(s) may be sourced

from social media and other public information sources.

4.2 Managing the incident

Depending on the type of incident, a 'Critical Incident Response Coordinating (CIRC) Group (crisis team) may be activated to assess and respond to a critical incident. The CIRC Group will include the Case Manager (College Director or delegate), Senior Management Team and others as relevant.

To facilitate the management of a critical incident involving students, the Case Manager is responsible for:

- liaising with incident First Responders and witnesses
- liaising with the assigned SafeWork NSW or WorkSafe ACT allocated inspector
- where appropriate, liaising with:
 - University partner representatives
 - emergency providers, including doctors and hospitals
 - government agencies, including the Department of Foreign Affairs and Trade, DHA and AusAID
 - relevant embassies and consulates, and
 - relevant religious personnel.
- where appropriate:
 - notification of the critical incident to various stakeholders such as parents, agents, staff and affiliates, students, insurers, regulatory/statutory bodies
 - ensuring that appropriate contact is made with the student's emergency contacts, next of kin or other family
 - assisting the student and their family with travel arrangements to or from Australia
 - arranging counselling
 - seeking other emergency assistance.
- ensuring that:
 - the student's record is updated in the student records management system
 - where relevant, there is appropriate reporting to DHA via PRISMS
 - the Critical Incident Register is updated to allow for future reporting and planning of risk mitigation activities.

If the State/Territory Police contact SGA for personal information about any individuals, the Case Manager will ask the Police to provide a written request specifying the personal information required and the purpose of the request. The Case Manager will release only the minimum personal information requested. Where the personal information is about a student, the Police written request and response will be kept with the student's records.

The release of any personal information to external parties must comply with the Student

Privacy Policy.

4.3 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.

The Case Manager will prepare a letter of condolence to be sent on behalf of SGA.

4.4 Student support

The student support team is available to provide support to students who are affected by a critical incident, with:

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

The Case Manager will advise SGA staff and students of the available support services early in the development of a critical incident response timeline.

4.5 Additional support for international students and their families

Where appropriate in the event of a critical incident resulting in serious injury and hospitalisation, SGA may consider offering financial assistance to the student's parents, to enable them to meet travel costs and visit the student in hospital.

Where appropriate in the event of the death of an international student, SGA may consider offering financial assistance to the student's parents, to enable them to meet travel costs.

The College will work with the student's family and any relevant insurance provider to expedite appropriate arrangements for a funeral and/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. Discussions may include protocols and arrangements for:

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

4.6 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, SGA will:

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

The Case Manager will manage notifications of relevant critical incidents involving students under 18 years of age to relevant State/Territory Police, State/Territory agencies and other relevant Commonwealth agencies within 24 hours.

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 use all reasonable methods of locating the student, including social media, before reporting to State/Territory Police and other relevant Commonwealth and State/Territory agencies within 24 hours.

For information on student safeguarding and the accommodation, support and welfare requirements for international students under 18 years of age, see both the SGA Safeguarding Policy and Procedures and the SGA Accommodation and Caregiver Policy and Procedures.

The College will report the student to DHA via PRISMS when it can no longer take responsibility for the student's welfare arrangements. It will also make all reasonable efforts to immediately notify the parents, legal guardians or Caregiver.

5. Records management

Records in association with this policy will be kept in accordance with the SGA Records Management Policy and Procedures. Confidential documents related to the implementation of the policy will be maintained according to relevant privacy requirements.

6. Definitions

The following definitions are used in this Policy:

Affiliates	Consultants and contractors to the College; members of the SGA Board and committees; members of College committees; and any other persons appointed or engaged by SGA to perform duties or functions on its behalf.
Caregiver	A person engaged by a student's parents or legal guardians to provide support and welfare services to the student in Australia, while on a student visa.
Case Manager	The College Director, or delegated staff member who is responsible for implementing a College response to a critical incident.
College	Each of ANU College and Taylors College Sydney, including College staff and affiliates.

College Director	The most senior staff member for the College (or their delegate).
Course	A sequence of academic subjects delivered by SGA to achieve stated learning outcomes. A course may also be known as a program.
Critical incident	<p>A traumatic event, or the threat of a traumatic event, either on or off campus or online, that causes extreme stress, fear or injury to one or more students, such as significant disruption to the study routine (which might prevent a student from completing or continuing with the course), an emergency management situation, or threat to the safety of students and staff.</p> <p>Critical incidents include, but are not limited to:</p> <ul style="list-style-type: none">• students who have gone missing, whose whereabouts are unknown and who are unable to be contacted.• severe verbal or physical aggression• critical mental health episodes• drug or alcohol abuse• domestic violence• physical, sexual or other abuse or assault• death, serious injury or any threat of these• serious accidents• fire or natural disaster.
Delegate	A person authorised to perform a specific responsibility.
Department of Home Affairs (DHA)	The Australian Government department responsible for issuance of student visas and provision of student visa services (www.homeaffairs.gov.au).
Enrolled	For the purposes of this policy, an enrolled student is one who has been issued an electronic Confirmation of Enrolment (eCoE).
First Responder	The College staff member or affiliate who is called to respond to the critical incident. It includes individuals who provide assistance in a volunteer capacity in time-critical, and often life-threatening situations, such as first aid/mental health first aid volunteers.
Notifiable incident	<p>A critical incident involving a student which is notifiable to SafeWork NSW, or WorkSafe ACT, because it involves:</p> <ul style="list-style-type: none">• the death of a person• a serious injury or illness of a person• a dangerous incident.

PRISMS	The Provider Registration and International Student Management System. It is the Australian government system that Australian education providers use to issue, amend and cancel electronic Confirmations of Enrolment for students.
SGA	Study Group Australia Pty Limited.
Special Consideration	An adjustment compensating for mitigating circumstances that have impacted on individual student's ability to demonstrate their learning achievements in an assessment.
State/Territory	For the purposes of this policy, the Australian State or Territory in which a College operates.
Student	Any student of a course delivered by SGA, other than the University of Sydney Preparation Programs.

7. Related documents

The following legislation and documents are related to this Policy:

Children and Young People Act 2008 (ACT)

Children's Guardian Act 2019 (NSW)

Children and Young Persons (Care and Protection) Act 1998 (NSW)

Education Services for Overseas Students (ESOS) Act 2000 (Cth)

Education Services for Overseas Students Regulations 2019 (Cth)

Education Services for Overseas Students (Foundation Program Standards) Instrument 2021

ELICOS Standards 2018

National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code)

Work Health and Safety Act 2011 (ACT)

Work Health and Safety Regulation 2011 (ACT)

Work Health and Safety Act 2011 (NSW)

Work Health and Safety Regulation 2017 (NSW)

Privacy Act 1988 (Cth)

Accommodation and Caregiver Policy and Procedures

Records Management Policy and Procedures

Safeguarding Policy and Procedures

Student Enrolment Terms and Conditions

Student Privacy Policy

SGA Critical Incidents Policy and Procedures

7. Policy governance

Document name	SGA Critical Incidents Policy and Procedures		
Version number	V2.0		
Policy Owner(s)	Head of ISCs		
Endorsed	Executive Team	Date Endorsed	8 December 2021
Approved	Managing Director, SGANZ	Date Approved	8 December 2021

8. Document history

Commencing Date	Summary of Changes	Next Review Date
25 March 2019	V1.0 Establishment of policy	March 2024
11 June 2019	V1.1 Minor administrative amendment and addition of the 'First Responder' definition	March 2024
8 December 2021	V2.0 Major review, based on alignment with USPP Critical Incidents Involving Students Policy and Procedures, College processes, and WHS requirements.	8 December 2024

Appendix A: Contact details for emergencies, security services and ongoing support/assistance for students affected by critical incidents

External contacts

In a life threatening emergency, students should contact emergency services by dialling triple zero (**000**).

For non-life threatening emergencies, students should contact NSW Police and ACT Policing Assistance Line – contact **131 444**, 24 hours a day

Department of Home Affairs – contact **131 881**, 9am to 5pm, Monday to Friday

Taylors College Sydney

- (1) Students who feel unsafe on campus or are concerned for someone else's safety can call the Taylors College Sydney emergency phone line on +61 407 663 989 or email studenthelp@studygroup.com
- (2) Students who have experienced sexual assault can contact:
 - (a) NSW Rape Crisis Service on **1800 424 017**, 24 hours a day
 - (b) **1800 RESPECT** on **1800 737 732** or online via www.1800respect.org.au, 24 hours a day
 - (c) Royal Prince Alfred (RPA) Hospital Sexual Assault Service on **+61 2 9515 9040** (Monday to Friday) or **+61 2 9515 6111** (after hours). Counselling and medical services are available for anyone who has been sexually assaulted. Campus Security can arrange transport to RPA.

ANU College

- (1) Students who feel unsafe on campus or are concerned for someone else's safety can call the ANU College emergency phone line on +61 2 612 50957 or call the ANU Security phone line on **+61 2 612 52249**
- (2) Students who have experienced sexual assault can contact:
 - (a) Canberra Rape Crisis Centre on **+61 2 624 72525**, 7am – 11pm each day
 - (b) **1800 RESPECT** on **1800 737 732** or online via www.1800respect.org.au, 24 hours a day
 - (c) Canberra Hospital Forensic and Medical Assault Sexual Clinic on **+61 2 5124 2185** (Monday to Friday 9am – 5pm) or **+61 2 5124 2222** (after hours).

Appendix B: Critical Incident Report Form

FIRST RESPONDER TO COMPLETE SECTIONS A, B, C AND D

SECTION A: PERSON REPORTING INCIDENT DETAILS

Name of person reporting the incident:
Student <input type="checkbox"/> Staff <input type="checkbox"/> Other <input type="checkbox"/>
Contact Email:
Contact Mobile:
Date of this report: ___ / ___ / _____

SECTION B: DETAILS OF STUDENT INVOLVED IN CRITICAL INCIDENT*

Name:	Student identification number (ID):
Date of Birth:	Address:
Contact number:	Course:
Home country:	Passport number:
Is the student under the age of 18? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Has contact been made with the student's next of kin/ emergency contact? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Where an agent exists for the student, have contact details been provided? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Is the student currently enrolled? <input type="checkbox"/> Yes <input type="checkbox"/> No	

**If there is more than one student involved, please fill out a separate form for each student.*

SECTION C: INCIDENT DETAILS

This is the section where you fill out the details of the incident.

Date and time

When did the incident occur? If unsure, please select 'unknown'.

Date: ___ / ___ / _____	Time: ____ : ____ AM/PM	<input type="checkbox"/> Unknown
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Location

Did the incident occur on or off campus? <input type="checkbox"/> On campus <input type="checkbox"/> Off campus <input type="checkbox"/> Online
What was the exact physical location of the incident (if known)? For example, the street address and the description of the place the event occurred at.
Street number and name:
Description of place:

<input type="checkbox"/> Unknown <input type="checkbox"/> Not applicable
What was the online location of the incident (if known)? Link: <input type="checkbox"/> Unknown <input type="checkbox"/> Not applicable
Was anyone else involved in the incident? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown Please provide name and contact details, if known.

Type

Please select the category that best represents the critical incident, i.e., choose only one.

Critical mental health episodes

- Death, serious injury or any threats of these
 - Domestic violence
 - Drug, alcohol, or other substance abuse
 - Fire or natural disaster
 - Missing students
 - Physical, sexual or other abuse or assault
 - Serious accidents
 - Severe verbal or physical aggression
 - Other, please specify:
-

Incident details

Please provide a short description of what happened.

First aid

Did a first aider give treatment? <input type="checkbox"/> Yes <input type="checkbox"/> No (Go to the next part) <input type="checkbox"/> Unknown (Go to the next part)
Name of the first aider who gave treatment:

What treatment did the first aider give?

Emergency services

Were emergency services involved/called? Yes No (Go to the next part)

What service was initially called/involved? Ambulance Fire department Police

Name of attending police officer and police event number (if applicable):

Was the student hospitalised? Yes No (Go to the next part)

Name of the hospital:

Other actions and outcomes

Were there any other actions taken at the initial response?

Witness information (if applicable)

Where possible, include details of anyone who witnessed the incident.

Witness type(s) (can select more than one): Student Staff Public

Witness name:

Witness contact details:

Witness name:

Witness contact details:

SECTION D: REPORTING

Was the College Director notified of the incident? Yes No

Time and date the incident was reported to the College Director: ____:____ AM/PM
 ____ / ____ / ____

Name of the person who reported the incident: Same as SECTION A

CASE MANAGER (OR DELEGATE) TO COMPLETE SECTIONS E, F AND G

SECTION E: REPORTING

<p>Were there any other College delegate(s) to whom the incident was reported?</p> <p>Name: _____ Job title: _____</p> <p>Time and date the incident was reported to the delegate: ____:____ AM/PM ____ / ____ / ____ <input type="checkbox"/> Unknown</p>	
<p>Name: _____ Job title: _____</p> <p>Time and date the incident was reported to the delegate: ____:____ AM/PM ____ / ____ / ____ <input type="checkbox"/> Unknown</p>	
<p>Was the Head of International Study Centres, SGA notified? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Was the University partner notified? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Who has been notified of the incident?</p> <p><input type="checkbox"/> Parents</p> <p><input type="checkbox"/> Legal guardians</p> <p><input type="checkbox"/> Caregiver</p> <p><input type="checkbox"/> Next of kin/ emergency contact person as requested on student's record</p> <p><input type="checkbox"/> Consulate</p> <p><input type="checkbox"/> Agent</p>	
<p>In the case of sexual, domestic or family violence, was a report made to 1800RESPECT/ 1800 737 732?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p> <p>By who? (if known) _____</p> <p>Date made ____ / ____ / _____</p>	
<p>In the case of a death, serious injury/illness or dangerous incident, was a report to SafeWork NSW (13 10 50), or to WorkSafe ACT (13 22 81) made? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p> <p>Has the place of the incident been secured for inspection by SafeWork NSW or WorkSafe ACT? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p> <p>Has the College insurer been notified? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p> <p>In a case of sexual misconduct, has the complainant agreed to a notification to police and to participating with an investigation? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p>	
<p>Has a report been made to the Department of Home Affairs via PRISMS? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable</p>	

Outcome

What is the outcome of the incident for the student? Include date.	
Has a counsellor been allocated to the student by the College?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Did the police contact the College for personal information about students?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Is the written request attached as a file note?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Is a record of the information provided about the student attached as a file note?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown

SECTION F: INCIDENT MANAGEMENT**Incident management**

Has the Critical Incident Response (CIR) coordinating group been activated?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
If yes, what is the date the CIR was activated ____ / ____ / _____	
Please list the name(s) of the CIR coordinating group:	
<ul style="list-style-type: none">••••••	
Name of the case manager:	

SECTION G: CRITICAL INCIDENT ASSESSMENT

To be completed after initial report of the critical incident

Name of the person who completed this section:

Same as SECTION A

Date completed: ____ / ____ / _____

Please select the primary cause that may have contributed to the critical incident.

- | | |
|---------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Accident | <input type="checkbox"/> Self-harm |
| <input type="checkbox"/> Other physical assault or harassment | <input type="checkbox"/> Sexual assault or harassment |
| <input type="checkbox"/> Physical illness | <input type="checkbox"/> Study circumstances |
| <input type="checkbox"/> Psycho-social pressure | |
| <input type="checkbox"/> Other, please specify: | |

Has the matter been reported to the University partner? Yes No

Any further action(s) to be taken to resolve/address the incident and/or reduce the risk of reoccurrence?