

# Critical Incident Management Policy and Procedures

## Scope & Purpose

This policy and procedure applies to all staff and students of Russo Business School Pty Ltd ABN 34 601 105 319 trading as Russo Business School (RBS) (CRICOS Provider Code – 03441F). Russo Business School is part of the Sarina Russo Group of companies.

The Critical Incident Management Policy encompasses the management of critical incidents. It details the arrangements that apply to critical incident management in the context of the Russo Business Schools Risk Management Framework.

The policy provides the guidance for RBS to plan for, respond to and manage critical incidents ensuring it meets its duty of care obligations in providing the highest possible standard of health and safety and upholds its legislative obligations in relation to its staff, students, contractors, volunteers and visitors.

## Definitions and Abbreviations

**DHA** – Department of Home Affairs

**DET** – Department of Education and Training

**OSHC** – Overseas Health Cover Provider

A **critical incident** is a tragic and/or traumatic event which causes or is likely to cause extreme physical and/or emotional distress to staff and/or students and may be regarded as outside the normal range of experience of the people affected. The event has the potential to cause unusually strong emotional reactions in the Russo Business School community.

**Emergency Critical Incident** means those incidents which involve the possibility of immediate or imminent threat, physical and/or emotional distress to staff, job seekers, students and other visitors to our organisation; and which may be regarded as outside the normal range of experience of the people affected.

**Non emergency Critical Incident** means those critical incidents which do not involve the need for an initial emergency response but which nevertheless involve the possibility of threat, physical and/or emotional distress to staff, job seekers, students and other visitors to our organisation; and which may be regarded as outside the normal range of experience of the people affected.

Some examples of critical incidents include:

- Any fatality, near fatality or incident likely to affect seriously a number of staff and/or students;
- Serious accidents
- Murder or suicide involving students or staff and their family members;
- Physical or sexual assault
- Fire, explosion, bomb or arson threats
- Chemical, radiation or bio-hazard spillage
- Electrical Hazard, Gas Leak
- Suspect items, building defects
- Hold-up or attempted robbery
- Threats of violence to staff/students
- Armed Intrusion, Hostage Taking
- Distressing or disturbing behavior
- Major theft or vandalism
- Threat of infectious disease such as meningococcal
- Incidents involving pain or abuse of children
- Incidents in which sights, sounds, or smells are distressing
- Storms/natural disasters
- Acute illness (physical or mental)
- Missing students

Every critical incident is unique and will need to be dealt with differently, according to the needs of the people affected.

Russo Business School (RBS) understands that critical incidents can have a wide reaching and sometimes devastating effect on an individual. This policy has been implemented to ensure an effective and timely response to such an incident and to provide a framework within which RBS can address the immediate and possible longer term needs of those involved.

### **Emergency Critical Incident Coordinating Team**

The Russo Business School Emergency Critical Incident Coordinating Team will be responsible for managing, coordinating, planning and implementing a timely and effective response to an emergency critical incident. This team comprises the following staff members:

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- Chief Executive Officer
- Chief Operating Officer
- Russo Business School Dean, Academic Operations
- Senior Manager, Operations
- Academic Manager, Diploma Programs
- Legal Contract Compliance Executive
- Manager, Academic Operations and Standards

The Emergency Critical Incident Coordinating Team may co-opt additional staff members or external bodies as appropriate to a particular incident.

The Legal Contract Compliance Executive will act as secretariat for all Emergency Critical Incident Coordinating Team meetings.

The Emergency Critical Incident Coordinating Team will meet within one month after an emergency critical incident to evaluate the implementation of procedures and responses, and suggest improvement activities if necessary.

### ***International students***

For Internal students the following external bodies may need to be contacted:

- DHA
- Relevant consulate or embassy
- Overseas Health Fund Provider

### **Oversight and Evaluation**

The Manager, Academic Operations and Standards will provide regular reports to the RBS Board of Directors and the Audit Risk and Compliance Committee (ARCC) in relation to critical incidents that have occurred (critical incidents are to be recorded in the RBS Critical Incident Register, including the actions implemented by the RBS managers and Emergency Critical Incident Coordinating Team where relevant) and the corresponding outcomes.

# Critical Incident Management Policy and Procedures

## Procedures

This policy outlines the procedures to be followed in the event of a critical incident involving any member of the Russo Business School (RBS) community. It has been written to assist staff and students to respond appropriately to incidents that are likely to cause trauma to individuals and/or affect the RBS community as a whole.

The following table shows examples of the intensity levels of a critical incident as well as brief notes on the level of reporting and follow up action required.

Incident level	Examples of behaviour or events	Reporting Process	Debrief for RBS staff involved
<b>Emergency</b>	<p>Fatality/near fatality</p> <p>Serious accidents</p> <p>Murder suicide</p> <p>Physical, sexual assaults</p> <p>Fire, explosion, bomb/arson threats</p> <p>Chemical, radiation, bio-hazard spillage</p> <p>Electrical hazard, Gas leak</p> <p>Suspect items, building defects</p> <p>Robbery</p> <p>Threats to personal safety or abuse incidents</p> <p>Natural disasters</p> <p>Missing student</p> <p>Threat of infectious disease (risk of an epidemic)</p>	<ol style="list-style-type: none"> <li>1) For all Incidents requiring an emergency service; (fire, ambulance or police) contact 000 immediately.</li> <li>2) The staff member who is notified or is aware of the incident must: <ol style="list-style-type: none"> <li>a) Ensure the emergency services are contacted as appropriate.</li> <li>b) immediately notify the Chief Executive Officer and/or the Emergency Critical Incident Coordinating Team members. Should the incident occur out of hours then the designated person must be contacted;</li> <li>c) The Chief Executive Officer and/or the Emergency Critical Incident Coordinating Team must assess whether the incident is an emergency or a non-emergency critical incident.</li> <li>d) building evacuation procedures enacted controlled by the Chief Fire Warden, if appropriate;</li> <li>e) submit an incident report to <a href="mailto:incident@russo.qld.edu.au">incident@russo.qld.edu.au</a>; and</li> <li>f) if appropriate, record the incident on student's file.</li> </ol> </li> <li>3) The Chief Executive Officer; the members of the Emergency Critical Incident Team; and/or the out-of-hours contact will notify; DIBP, embassy/consulate officials and OSHC Insurers as required.</li> <li>4) The Chief Executive Officer will convene an Emergency Critical Incident Coordinating Team meeting as soon as practicable.</li> <li>5) If required, Emergency Business Continuity Plan will be enacted by the Emergency Critical Incident Coordinating Team.</li> <li>6) Other Campus support services will be notified by the Chief Executive Officer as required.</li> <li>7) The Manager, Academic Operations and Standards must update the Critical Incident Register and include incident in a report to the ARCC at the next meeting following the incident.</li> <li>8) Dependent on the nature of the incident, a central organizational or external emergency, military services control may occur.</li> </ol>	<ul style="list-style-type: none"> <li>• Formal team debrief</li> <li>• One on one with Manager</li> <li>• One on one with those involved as appropriate</li> <li>• Consider Employee Assistance Program</li> <li>• Review policy and procedure as appropriate</li> </ul>
<b>Non-emergency</b>	<p>Theft or vandalism (but student, staff or person was unharmed)</p> <p>Distressing or disturbing behaviour (but no immediate risk to safety or wellbeing of students or staff)</p> <p>smells</p> <p>Acute but not life-threatening illness (except where there is a risk of an epidemic)</p>	<ol style="list-style-type: none"> <li>9) The staff member who is notified or is aware of the incident must: <ol style="list-style-type: none"> <li>a) Confirm that the incident is a non-emergency and that the emergency services are not required.</li> <li>b) immediately notify the RBS Dean, Academic Operations;</li> <li>c) submit an incident report to <a href="mailto:incident@russo.qld.edu.au">incident@russo.qld.edu.au</a>; and</li> <li>d) if appropriate, record the incident on student's file.</li> </ol> </li> <li>10) The Chief Executive Officer must assess whether the incident is an emergency or a non-emergency critical incident. If the incident is assessed as an emergency then the emergency critical incident procedure (see above) will apply.</li> <li>11) The Chief Executive Officer will notify the police, DIBP, embassy/consulate officials and OSHC Insurers as required.</li> <li>12) Other Campus support services will be notified by the Chief Executive Officer as required.</li> <li>13) The Manager, Academic Operations and Standards must update the Critical Incident Register and include incident in a report to the ARCC at the next meeting following the incident.</li> </ol>	<ul style="list-style-type: none"> <li>• Formal team debrief</li> <li>• One on one with Manager</li> <li>• One on one with those involved as appropriate</li> <li>• Consider Employee Assistance Program</li> <li>• Review policy and procedure as appropriate</li> </ul>

### ***What to do during an incident involving aggressive behaviour by a student\*?***

As we are in the field of Higher Education and have a student population, a specific approach and general strategies and principles for incident management include:

- While always considering the risk to personal safety, it may be helpful to direct the student away from others to a quieter part of the classroom or building where their concerns can be discussed without an 'audience'. Staff should consider whether the discussion should be conducted with another staff member present and should avoid isolating themselves in an office or room that does not have easily accessible exit points.
- Maintain a safe distance from the student. This distance will vary depending on the assessment of the risk to personal safety.
- Staff should stay calm and avoid raising their voice.
- Be polite, but speak with firmness and authority. The speed at which a person speaks, the volume of their voice and the body language can be important in influencing a person's behaviour.
- Staff should use their judgement to decide whether using the student's given name would assist in calming the student.
- Ensure the student knows they are being listened to and paid attention by paraphrasing their concerns.
- Deal with the facts when addressing the student's concerns and focus on what can be done to help them.
- Explain things clearly and give the student enough time to consider the situation and what has been said.
- Do not make promises to the student that cannot be kept.
- Spell out the next step/steps in resolving the issue/s. If you are uncertain of the next steps, and if appropriate, you should consider asking the student to come back later when there has been time to consider the issue and/or consult on options.
- If a student's behaviour is unacceptable, or becoming unacceptable, the student should be warned of the consequences of such behaviour (such as police being called). Any warnings given to the student should be file noted.
- If the incident occurs outside RBS premises, the staff member/s should withdraw from the situation if they consider their personal safety is being compromised.
- Where staff assess that people and/or property are at risk and negotiation/discussion is not an option (for instance, where a critical incident is already occurring), it is recommended you consider immediately contacting the police.

\*This can also be applied where the aggressive behaviour is from a member of the public or another person who is not a student.

Refer to the attached flow chart as the procedural guide to the management of Critical Incidents.

### What is Business Continuity Management?

Russo Business School's business strategies and decisions are based on the assumption that the business will continue to operate as normal on a daily basis. While Risk Management is about identifying possible risks and putting into place treatments to try to prevent an occurrence that impacts on operations, Business Continuity Management (BCM) details the necessary procedures and strategies that are to be actioned should an actual disruption occur. The objective of Business Continuity Management is to ensure the uninterrupted availability of all key Russo Business School's resources required to support essential (or critical) business activities.

The Business Continuity Management Framework sets out the processes and tools necessary to enable rapid response to incidents, recovery of key processes and restoration to core business activities (Business As Usual). The Business Continuity Management Framework is based on the preparation of:

- Business Continuity Plans (BCP) for key areas and activities of Russo Business School
- disaster recovery planning for critical infrastructure and resources
- communications and media liaison strategies, and
- crisis management and recovery, and emergency planning.

### Link to Risk Management

Business Continuity Management is inextricably linked to Risk Management – one is the consequence of the other. Where Business Continuity Management (including Planning and Testing) comes into force is through Impact. **The risk event has occurred, how should Russo Business School respond, recover and restore to full operations?** Similarly to Risk Management, the scale and timing of incidents/events cannot be reliably predicted, however the difference lies in being able to categorise where the known impacts can occur.

### Why a Business Continuity Management Approach?

Due consideration needs to be given to the management of incidents and crises across Russo Business School. This requires collaboration between all key staff and a two-way flow of information during incidents and events. Planning also allows for both correct local and high level response to occur and also drives fundamental awareness and core resource area level of capital requirements, service availability and 'gaps'.

By implementing a Business Continuity Management Framework Russo Business School is able to:

- recognise the risks and impacts, key resources and core processes
- respond to the event; protect life, property, systems and other resources
- recover the resources, systems and processes
- restore to full operations, and
- review response, test preparedness and recalibrate planning.

It is important to remember that incidents can occur across, or affect a range of categories, and are not limited to the traditionally-expected areas of Facilities Emergencies and IT Disasters. Taking a broader view allows a wider classification of impacts as per the following impact categories:

- People
- Campus Operations - Facilities, Services and Environment
- Core IT Systems and Communication
- Finance and Legal Operations
- Payroll
- Reputation and other.

## **People**

Responsible Manager: Chief Executive Officer

Russo Business School places priority around student and staff safety and wellbeing. Appropriate training and access to emergency resources both internal and external are paramount as to mitigate loss or injury of our people.

## **Campus Operations**

Responsible Manager: Chief Operating Officer

The Russo Business School Campus is a hub of learning and teaching delivery, engagement work and the day-to-day operations of the organisation. There are various 'threats' (natural or man-made), which could cause a full or partial disruption to the operations of or access to any of these campuses. Appropriate Business Continuity and Crisis planning needs to be in place to ensure that these disruption events can be managed quickly, with particular regard to the safety of life and property being the highest priority. It is recognised that the Campus is entirely contained within a single building or facility, such that the loss of access to or operation of that facility would constitute full closure. Considerations of looting and other like inappropriate activity must also be taken into account, and will utilise existing structure / implementation for internal audit, tracking and management control.

Specific 'Emergency Management' protocols are detailed separately in the associated processes contained within Russo Business School's Fire Evacuation Procedures; however they are very much linked.

## **Core IT Systems and Communications**

Responsible Manager: Chief Information Officer

Russo Business School's Core Information Technology (IT) systems will focus on supporting the core business of Engagement, Learning. As such it is imperative that appropriate measures are put in place to quickly rectify any disruption to IT services across our campus.

Disaster Recovery Planning is a key requirement in this area, and continuous efforts must be made to ensure that successful enactment of this requirement can be undertaken quickly, to reduce the flow on effects of disruption. Obvious linkage to campus operations, thus plans need to take this into account.

## **Financial and Legal Operations**

Responsible Managers: Group Finance Manager, Legal Counsel

The ability to conduct transactional business (both inwards and outwards) is critical for the operations of any organisation. Business Continuity Planning in this regard needs to consider activities including Accounts Receivable, Accounts Payable, Banking, Financial and Management Reporting (non-exhaustive). Obvious linkage to core IT systems, thus plans need to take this into account.

Considerations of fraud and other like inappropriate activity must also be taken into account, and will utilise existing structure / implementation for internal audit, tracking and management control.

## **Payroll**

Responsible Manager: Group Finance Manager

Our employees are the key to delivering Russo Business Schools promise to our stakeholders and for meeting our strategic aspirations in regards to Engagement, Learning and Teaching, Innovation, and Engaged Enterprise. As such, Russo Business School has an obligation to ensure that staff are not personally affected by a disruption to payroll activities.

Obvious linkage to campus operations, core IT systems and financial operations, thus plans need to take this into account.

## **Reputation and Other areas**

Responsible Manager: Chief Operating Officer

Emergency Critical Incident Coordinating Team will be responsible for developing a strategic framework for ensuring all incident/emergency elements of Russo Business School remain functionally effective in the event of a major incident or emergency event. The Emergency Critical Incident Coordinating Team will also be responsible for testing Russo Business School's responsiveness to potential threats and emergency situations on an ongoing basis and for reporting any major concerns to the Chief Executive Officer for further advice.

Emergency Critical Incident Coordinating Team is the group responsible to the Chief Executive Officer for the coordination of the overall response to incidents or emergencies event at the Campus.

Emergency Critical Incident Coordinating Team will provide overall coordination across the Campus and will be responsible for directing recovery efforts post incident, emergency event. This ensures rapid response to emergencies whilst maintaining appropriate governance structures for the management of incidents or emergency situations.

Emergency Critical Incident Coordinating Team will provide the point of interface with other emergency service agencies, such as the local Disaster Management Group, Police/Fire/Ambulance Services, and Declared Emergency Service Groups on behalf of Russo Business School.

#### **Related Legislation, Standards & Documents**

[Australian Qualifications Framework \(2<sup>nd</sup> ed, January 2013\)](#)  
[Commonwealth Register of Institutions and Courses for Overseas Students \(CRICOS\)](#)  
[Disability Standards for Education 2005 \(Cth\)](#)  
[Disaster Management Act 2003](#)  
[Educational Services for Overseas Students Act 2000 \(ESOS Act\)](#)  
[Higher Education Standards Framework \(Threshold Standards\) 2015](#)  
[Higher Education Support Act 2003 \(HESA\)](#)  
[Information Privacy Act 2019 \(QLD\)](#)  
[National Code of Practice 2018](#)  
[Privacy Act 1988](#)  
[Privacy Amendment \(Enhancing Privacy Protection\) Act 2012](#)  
[Queensland Fire Regulations](#)

#### **Related documents to be read in conjunction with**

##### ***Policies***

*Privacy Policy*

##### ***Corporate Strategy and Governance***

*Russo Business School Emergency Critical Incident Coordinating Team*

*Russo Business School Strategic Plan*

##### ***Forms and Agreements***

*Critical Incident Report Forms*

##### ***Registers***

*Business and Compliance Register – Critical Incident, Complaint and Appeals*

**Delegation**

Delegated Authority	Delegation
<b>Governance</b>	
Risk Management and Compliance Committee	Refer to Service Level Agreement Sarina Russo Job Access (Australia) Pty Ltd and Russo Higher Education 2 Pty Ltd
Board of Directors	Refer to the Terms of Reference
Audit, Risk and Compliance Committee	Refer to the Terms of Reference
<b>Executives</b>	
Chief Executive Officer	Relevant to Accountability Statement

**Version control**

Policy & Procedure Version No	Policy & Procedure Sponsor	Approval Authority	Date of Approval	Date for next review
1/2017	Risk Management and Compliance Committee	Risk Management and Compliance Committee	7 November 2017	6 April 2018
2/2018	Risk Management and Compliance Committee	Risk Management and Compliance Committee	3/04/2018	3/04/2019

Russo Business School Critical Incident Policy - Response Flowchart

