Critical Incident Policy

This policy is current as of 1 January 2014 and will be reviewed at least annually by the Academic Board.

Scope

This policy is applicable to Kaplan Higher Education Pty Ltd, trading as Kaplan Online Higher Education.

Purpose

This policy establishes the management plan for critical incidents as they may occur while students are undertaking their study at Kaplan. It applies to all qualifications and programs run by Kaplan.

The purpose of the Critical Incident Policy is to provide the rationale and rules for managing critical incidents that may occur while students are undertaking Kaplan courses or subjects.

What is a critical incident?

A critical incident is a sudden event or situation which may put the staff and students under major stress both physically and emotionally. In assessing a critical incident, consideration must be given to the existing factors and mood of the staff and/or students at the time of the incident. It will also depend on how public the incident is and the number of people affected. It is important to note that what is a critical incident for one person may not be a critical incident for another. It depends on one’s perception of vulnerability and amount of control over a situation.

In general terms, a critical incident is defined as a 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.

For the purpose of this policy the following events are defined as critical incidents:

- Serious injury or death
- Physical or sexual assault
- Violence or threats of violence
- Hold up, attempted robbery
- Sudden or unexpected death or suicide of a work colleague
- Natural disasters
- Fire, explosion, bomb threats
- High publicity violent crimes
- Any incident that is charged with extreme emotion.
- any fatality, near fatality or incident likely to affect seriously a number of staff and/or students
- serious traffic accidents
- major theft or vandalism
- threat of HIV infection
- incidents involving pain or abuse of children
incidents in which sights, sounds, or smells are distressing
- storms/natural disasters
- acute illness (physical or mental)
- a student under the age of 18 going missing.

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

Prevention and preparation

Emergency evacuation notices illustrating the location of assembly in the event of a fire or other similar situation are to be prominently displayed throughout the building. Emergency wardens are to be appointed and trained regularly in emergency procedures. The availability of appropriate resources and the development of safety measures to be monitored on a regular basis through the WHS contact and relevant managers. Regular practice building evacuations are to be carried out. Staff are encouraged to report any possible safety issues to management. New staff are made aware of the Critical Incident Policy and Procedure as part of induction processes.

The relevant Student Services Managers should maintain a contact list of all relevant community resources including:
- Medical authorities
- Police
- Funeral Directors
- Religious leaders
- Ethnic group leaders
- Consular representatives
- Insurance people
- Interpreters.

Management plan

The following steps outline the process to manage a critical incident.

1. Critical Phase

The critical phase is that time immediately after the incident has occurred, or the point in time when the student first contacts Kaplan. Staff should assess the situation and ensure that they consider the following:
- Ensure that the student is safe and is receiving adequate medical supervision in a safe environment
- Ensure that other students are safe
- Determine if evacuation procedures are required to be implemented
- Report incident to the relevant Kaplan Manager (e.g. college director)
- Contact relevant authorities as appropriate (e.g. police, ambulance)
- If necessary call an interpreter and have them stand by for assistance
- Once the student is not in danger and receiving medical supervision resume activities if appropriate
• At the earliest time interview the student to ascertain what happened and any ongoing problems
• Support other students or arrange for counselling to occur
• Address any other immediate needs, i.e. additional support, police report, report stolen goods etc
• Follow the procedures outlined in Appendix 1 in the case of a death of a student.

2. Ongoing Supervision and follow-up

Once the incident has been managed and necessary contact has been made with relevant personnel, it is important that follow-up of the student is undertaken by a nominated staff member. This may include:
• Keeping in contact with the student and relevant others. Monitor the situation with a daily call
• Checking that the student is receiving ongoing help with medical conditions and counselling
• Passing on findings to the appropriate manager and other relevant people.

3. Investigation Process

To ensure that the incident is accurately recorded and managed the nominated Kaplan Manager should:
• Collect facts about the incident (e.g. injuries to person, any witnesses, information from the scene). This may be in written form or through the use of media such as photographs as appropriate
• Examine any work/operating procedures or training that may have impacted the incident
• Determine the cause of the accident/incident paying attention to contributing factors, environmental factors, mechanical failure, and systems failure
• Review work procedures, training, and/or safe operating procedures
• Document recommendations and communicate results of investigation to relevant others.

4. Reporting

Written and or verbal reports are provided to the appropriate manager including any recommendation on ways to prevent similar occurrences. Media enquiries should be referred to the General Manager, Administration and Communications. Written reports, approved by the student, are to be put on the student’s file and on Kaplan’s Critical Incident file and sent to the parents of the student and other relevant authorities with permission. Following any critical incident the nominated Kaplan Manager should complete the Checklist in Appendix 2. This should also be filed with the report in Kaplan’s Critical Incident file.

Responsible Officer

The responsible officer for the implementation and relevant training of this policy is the Vice President, Higher Education Australia.
Appendix 1 – Procedures in case of student death

In the case that an incident results in the death of a student, the relevant Kaplan Manager should form a coordinating committee that is comprised of relevant managers and student advisor representatives. The responsibilities of this committee are to:

- Assess risk and plan immediate response actions
- Liaise with emergency and other services
- Allocate individual roles and responsibilities for tasks
- Make contact with appropriate personal which may include:
  - Next of kin
  - Other students (those involved, friends)
  - Hospital
  - Counselling/support staff
  - The person assigned to deal with the media
  - Teaching/academic and other relevant staff
  - Student associations
  - Chaplain or priest
  - DIAC, Consulate, Sponsor, Accommodation provider (for overseas students).
- Liaise with other external bodies
- Arrange counselling of students and staff not directly involved in the incident
- Plan ongoing strategies
- Keep careful records throughout the process
- Ensure staff left in the office have enough information to handle enquiries
- Establish what costs can be met by Kaplan
- Discuss fee reimbursement
- Investigate any insurance issues
- Arrange condolence letters to everyone involved
- Arrange thank you letters
- Arrange a debriefing
- Offer follow up support to those involved
- Review critical incident procedure
- Review critical incident procedure.

For overseas students the responsibilities of the committee may also be to:

- Arrange a funeral or memorial service
- Obtain a copy of the death certificate and related documents
- Arrange repatriation
- Arrange for the student’s possessions to be stored or sent to his/her family.
Appendix 2 – Checklist for follow up, review and evaluation

How well were the following actions undertaken by the Critical Incident Coordinating Group?

1 = poor; 5 = excellent.

Please add comments to clarify your choice if required.

<table>
<thead>
<tr>
<th>Questions</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actions taken</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Follow up</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Availability of mobile phones</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Notification of and liaison with Sponsor/ Agent</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Arrangements for Family visit</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Liaison with Police, Doctors, Hospital Staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Liaison with Independent Interpreters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Death Notices</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Funeral/ Memorial Service Arrangements</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Refund of student’s fee to pay repatriation or associated expenses</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Copy of Death Certificate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consideration of personal items and affairs (household and academic)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insurance Matters, OHSC Coverage, Ambulance Cover</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Formal Stress Management interventions required for students and/or staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(release from classes, leave, rescheduled exams)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Liaison with Academic Staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Arrangements for further debriefing session for groups/ individuals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Liaison with Department of Immigration and Citizenship</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fees issue to be resolved for students unable to continue with their studies</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legal issues: helping students get access to legal assistance if required</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Follow up condolence or other letters to Family</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial Assistance for families of affected person(s) if residing in Australia</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Organising students/ staff for hospital visits</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>