CRITICAL INCIDENT MANAGEMENT POLICY

Category	Governing Policy
Review	3 years from date of Approval OR under exceptional circumstances
Code	GOV-018
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Version	Approval Authority	Approval Date	Review Date
2025.02	Board	26 Feb 2025	26 Feb 2028

1   PURPOSE

The policy aims to provide comprehensive guidelines to effectively identify, respond to, and manage critical incidents that impact any members of a TOP-IMC's community-students, staff, contractors, volunteers, and visitors. The policy supports the Institute in meeting its legislative and duty of care obligations, ensuring the highest standard of health, safety, and security for all members of the Institute's community. This policy should be read with *Critical Incident Management Procedure*.

Upon activation, this policy and its procedures will ensure a coordinated, timely, and sensitive response to critical incidents, safeguarding the welfare of all involved and maintaining the Institute's operational integrity and reputation both domestically and internationally, by having:

- Responded to, or resolved, in the best possible way for all affected individuals, their families, and the Institute.

- Documented appropriately the incident, remedial actions undertaken and its impact.

- Reported to relevant officers within the Institute and relevant international and Australian government agencies and other stakeholders (as required).

- Communicated appropriately to the family(ies) affected if necessary.

- Managed to ensure that the Institute's domestic and international reputations are not damaged due to the incident.

To achieve the intended outcomes, implementing this policy will:

- Establish an effective, comprehensive, and clearly communicated framework for managing and responding to critical incidents integrating into the Institute's Risk Management Framework and aligning with the Higher Education Standards Framework (Threshold Standards) 2021 and the ESOS National Code.

- Implement systematic and practical approaches for managing incidents classified as critical, which may significantly affect the Institute's operations, reputation, and/or community.

- Provide detailed processes for documentation, appropriate reporting to relevant officers within the Institute and necessary government agencies, and effective communication with affected parties and their families.

- Ensure that responses to critical incidents are managed in such a way as to prevent damage to the Institute's reputation.

- Continuously improve the Institute's response strategies and staff capabilities through regular review and evaluation of incident management practices.

2   SCOPE

This Policy applies to the Institute's students, staff, contractors, volunteers and visitors, as well any third parties used to deliver education or ancillary services. The policy applies across all sites, including sites operated by third party partners and offshore, and, in the case of students, applies to all critical incidents regardless of whether the student was engaged in an Institute-related activity.

- **Students**, which include:

  - Any category of individual or groups of enrolled students (e.g. non-award, undergraduate, postgraduate, research, domestic and international) at the Institute when the critical incident occurs on or off campus.

  - Any category of individual or groups of enrolled students from the Institute when the critical incident occurs during an approved Institute-related activity, regardless of it being onshore or offshore. The Institute's related activities include field trips, placements, internships, and study tours.

  - All international student critical incidents, regardless of whether, at the time of the incident, the student is engaged in an approved or non-approved Institute-related activity on or off campus or an approved Institute-related activity offshore.

  A written record of any critical incident and remedial action taken by the Institute will be maintained for at least two years after the international student ceases to be enrolled in an Institute course of study.

- **Staff:** This policy covers all TOP-IMC staff members, including full-time, part-time, temporary, and contract workers, in the event of a critical incident occurring on campus or during any approved Institute-related activity. This includes incidents occurring within the scope of their employment, whether onshore or offshore.

- **Contractors and Visitors:** Includes any contractors working on behalf of the Institute and visitors present on campus or participating in Institute-related activities where a critical incident occurs.

- **Volunteers:** Applies to all volunteers engaged in activities under the auspices of the Institute, whether the incident occurs on campus or during any Institute-sanctioned event or activity.

This policy seeks to ensure a consistent and effective approach to managing critical incidents that affect any member of the Institute community, safeguarding the health, safety, and welfare of all involved while maintaining the operational integrity and reputation of the Institute.

3   DEFINITIONS

Incident means any event or situation that disrupts or has the potential to disrupt the normal operations or safety of the Institute, its staff, students, or other stakeholders but does not rise to the level of a critical incident. Incidents require a coordinated response to manage and mitigate their effects to prevent escalation.

Critical Incident, according to ESOS Act Standard 6.4, means a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury. It may involve severe harm to individuals, substantial damage to Institute property, or significant reputational, legal, or financial repercussions. Critical incidents require immediate attention and significant resource allocation to manage and resolve.

Incident and Critical Incident Convenor (ICIC) means the person responsible for assessing the severity and impact of an incident or critical incident within the Institute. Based on their assessment, they have the authority to convene the Critical Incident Management (CIM) Team as necessary. The ICIC ensures that incidents are responded to effectively, coordinates the activation of appropriate CIM Team members, and oversees the management of the incident to ensure a coherent and coordinated response.

Critical Incident Management (CIM) Team means a designated group of staff members at the Institute tasked with the preparedness, response, and recovery from critical incidents. This team is responsible for implementing the *Critical Incident Management Procedure*, coordinating resources, and managing the overall response to ensure the safety and continuity of Institute operations.

4   PRINCIPLES

This policy is grounded in the principles set forth by the [Higher Education Standards Framework (Threshold Standards) 2021](#) and the [ESOS National Code](#), ensuring that the Institute's practices not only comply with but also exceed the baseline requirements established for higher education institutions in Australia. Specifically, this policy:

- Aligns with the HESF (Threshold Standards) 2021: The policy adheres to the requirements for maintaining high standards of health and safety (Section 2.3), effective information management (Section 7.3), and rigorous corporate monitoring and accountability (Section 6.2). This alignment ensures that the Institute is prepared to handle critical incidents with a structured and compliant approach, addressing both the immediate actions necessary during an incident and the subsequent follow-up and review processes.

- Incorporates ESOS National Code Requirements: By integrating principles from the ESOS National Code, this policy also caters to the specific needs of international students, ensuring that their rights and safety are adequately protected during critical incidents. This is particularly crucial given the diverse and global nature of the Institute's student body, requiring tailored approaches to incident management that consider cultural sensitivities and legal obligations.

- Ensures Comprehensive Coverage: The principles outlined in this policy cover all aspects of incident response, from the immediate action required at the time of the incident to the strategies for post-incident recovery and analysis. This comprehensive approach is designed to safeguard the wellbeing of all community members-students, staff, and visitors alike-and maintain the integrity and reputation of the Institute.

  o Safety and Wellbeing: Prioritise the safety and wellbeing of students, staff, contractors, volunteers, visitors, and the broader community. Responding quickly to, and effectively managing, critical incidents is a priority of the highest order. Ensure that all actions taken during a critical incident aim to safeguard individuals and minimise harm. Effective arrangements for on-going academic and well-being support, to minimize the likelihood that a critical incident will impede students' progression and completion, are in place. There are in place effective arrangements for on-going well-being support for staff adversely affected by a critical incident.

  o Leadership and Public Confidence: Maintain public confidence through robust leadership and transparent communication. Demonstrate command and decisiveness in crisis management to uphold the Institute's reputation and stakeholders' trust.

  o Protection of Assets and Compliance: Protect the Institute's property and assets while ensuring compliance with statutory obligations. Optimize financial outcomes by managing resources efficiently and effectively during and after incidents.

  o Business Continuity and Improvement: Resume normal operations as swiftly as possible with minimal disruption. Implement preventative measures to avoid the recurrence of similar incidents and continuously refine and improve response strategies based on lessons learned. After any critical incident, there is a thorough evaluation of the effectiveness of the response to, and management of, that incident, and any deficiencies identified are rectified as soon as possible. Critical incident management systems and procedures are regularly reviewed to achieve best practice, including through consideration of feedback from staff, students, and other stakeholders, and through benchmarking and external expert advice.

These principles are designed to support the implementation of the *Critical Incident Management Policy and Procedure* at TOP-IMC, ensuring a structured and effective response that aligns with the Institute's values and regulatory frameworks. Together, they form the cornerstone of our commitment to managing potential crises with efficacy and integrity.

5   RELATED DOCUMENTS

    i.   *Critical Incident Management Procedure*
    ii.   *Education Services for Overseas Students (ESOS) Act 2000*
    iii.   *Higher Education Standards Framework (Threshold Standards) 2021*
    iv.   *National Code of Practice for Providers of Education and Training to Overseas Students 2018*
    v.   *Staff Code of Conduct*
    vi.   *Student Code of Conduct*
    vii.   *Support for Students Policy*
    viii. *Bullying Harassment and Discrimination Prevention Policy*
    ix.   *Sexual Assault and Sexual Harassment Policy*
    x.   *Student Wellbeing and Mental Health Policy*
    xi.   *Workplace Health and Safety Policy*

6   VERSION CONTROL

Historical Version	Approved by	Approval Date
2024.08	Council	19 August 2024
2023.11	Executive	23 November 2023
2020.10	Principal	20 October 2020
2019.05	Principal	8 May 2019
2014.06	Principal	30 June 2014

7   STATEMENT OF OWNERSHIP/MAINTENANCE

The Risk and Compliance Committee oversees the implementation and compliance of this policy. Please contact policy@imc.edu.au for any enquiries or clarifications related to this policy.