

Critical Incident Policy

Scope

This policy is applicable to the Kaplan Australia and New Zealand Group (hereby referred to as 'Kaplan') including Kaplan Business School (KBS), Kaplan Professional (KP) and Kaplan International Languages (KIL), and applies to all staff and students, contractors and visitors of Kaplan for incidents that occur within or outside Australia and New Zealand.

Purpose

The purpose of this policy is to outline Kaplan's response to, and management of, critical incidents.

Policy Statement

Kaplan is committed to providing a safe environment for all and providing support mechanisms and procedures for managing a critical incident to ensure that Kaplan has:

- an effective approach in responding to critical incidents as they occur
- appropriate support and counselling services available for all those involved and affected
- appropriate training and information resources provided to staff
- taken steps to monitor/report on incidents and provide analysis to contribute to the mitigation of potential future incidents (where possible).

What is a critical incident?

A critical incident is a traumatic event which may cause students, staff, contractors or visitors extreme physical and/or emotional distress connected to Kaplan's business operations.

Some examples of critical incidents are:

- any death, or serious injury requiring emergency medical attention, or any threat of these
- confirmation of a serious infectious disease or virus
- physical or sexual assault, serious harassment or domestic violence where this has caused a death or severe psychological or physical trauma
- severe verbal, psychological aggression, or serious threats of violence
- fire, explosion or bomb threat resulting in death, significant injury or significant property loss
- a hold up or attempted robbery resulting in death, significant physical or psychological injury or significant property loss
- storms or other natural disasters
- traffic collision resulting in serious injury or death
- missing student who has been officially reported as missing to the police; or missing during off campus Kaplan activity, after reasonable attempts have been made to locate and contact them; or where a reasonable concern for their safety exists.

It is important to note that what is a critical incident for one person may not be a critical incident for another. Every critical incident is unique and will need to be dealt with differently and according to the needs of the people affected. Each critical incident also needs to be carefully assessed and managed in line with cultural sensitivities for the student(s) and/or staff impacted and their families.

Policy Principles

In managing critical incidents, Kaplan is committed to the following principles:

- protect the health and safety of staff, students, contractors, and visitors of Kaplan
- identify and prevent critical incidents, where possible
- allocate appropriate resources (internal and external) to manage critical incidents
- respond in a rapid and appropriate manner to a critical incident
- provide immediate support and clear guidance to those involved
- relay accurate information regarding the incident to all appropriate parties, including parents and family members, agents, foreign embassies, the police, emergency services and Government authorities
- maintain business as usual, where possible, to offer continuity to others
- evaluate the effectiveness, adequacy, and ongoing suitability of Kaplan's critical incident responses and comply with relevant legislation.

Guiding Procedures

To aid in the prevention of and preparation for critical incidents, Kaplan will:

- conduct training and drills for all staff and regularly review Kaplan's health and safety and emergency risk management systems
- inform relevant staff about the Critical Incident Policy as part of induction processes
- inform all students, including those under the age of 18, of this policy during Orientation
- ensure emergency evacuation notices illustrating the location of assembly in the event of a fire or other emergency are prominently displayed throughout Kaplan sites
- maintain a list of, and train staff who are First Aid Officers, Fire Wardens and First Responders and make their details readily available, where required
- allocate resources to maintain health and safety risk management systems via the support of the Health & Safety Champion Group, Emergency Planning committee, People & Culture Team and relevant managers.

If a Critical Incident takes place, the relevant Leadership and/or Management representative will manage the operational response, with a nominated Incident Leader, including the:

- implementation of this policy
- referral to the Health and Safety Reporting Process (please note some incidents may require immediate notification to the relevant WorkSafe regulator and site preservation requirements may apply)
- gathering of information and facts regarding the critical incident
- the determination of the severity of the critical incident and which internal stakeholders need to be involved
- assessment of risks and response actions
- liaison with emergency and other services
- communication with, and informing of, staff of critical incident details and updates as they occur
- communication with students' parents, legal guardians and/or other appropriate contacts
- liaison with other external bodies, such as carers, agents or foreign embassies and consulates
- counselling and management of students and staff not directly involved in the incident.

In conjunction with People & Culture, the following will take place where required:

- completing a health and safety issue form (within 24 hours) to ensure critical incidents are connected to Kaplan's health and safety incident management processes
- creating and disseminating ongoing action plans and a timeline following the conclusion of the incident
- maintaining in a central location, accurate records related to the incident and any action taken
- liaising with WorkSafe regulators
- creating any necessary media releases or public response
- ensuring relevant staff involved have been trained in critical incidents and if not, are adequately trained in the future
- conducting a debrief following the stand down of a critical incident to determine what worked well and any potential improvements.

The Australian *Privacy Act 1988 (Cth)* and New Zealand *Privacy Act 2020* permit Kaplan to disclose personal information about someone to a party outside of Kaplan where:

- a person consents in writing to their personal information being disclosed; or
- Kaplan believes, on reasonable grounds, that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual(s) concerned or another person/people; or
- the disclosure is required or permitted by law, or made in compliance with Kaplan's Privacy Policy.

Relevant Legislation

As a registered education provider, Kaplan operates under various laws and regulations. Policies and procedures are in place to ensure compliance with such laws. Below, please find the most relevant legislation that applies to this policy (Australian unless otherwise specified):

- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)
- Higher Education Standards Framework (Threshold Standards) 2021
- Standards for Registered Training Organisations (RTOs) 2015
- Education Services for Overseas Students (ESOS) Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Education Services for Overseas Students Regulations 2019
- ELICOS Standards 2018
- Privacy Act 1988 (Cth)
- Relevant Work Health and Safety Act and OHS Act and regulations
- Privacy Act 2020 (New Zealand)
- Education Act 1989 (New Zealand)
- The Education (Pastoral Care of International Students) Code of Practice 2016 (including Amendments 2019) (New Zealand)
- Modern Slavery Act 2018 (Cth)

Related Policies and Documents

This Policy should be read in conjunction with the following Kaplan policies and documents:

- Code of Business Conduct (available on Kaplan's Intranet)
- Corporate Social Responsibility Policy
- Critical Incident Management Framework (available on Kaplan's Intranet)
- Health and Safety Issue Form
- Health and Safety Management Manual
- Health and Safety Policy
- Health and Safety Reporting Process
- Private Policy
- Sexual Misconduct Prevention and Response Policy
- Prevention of Harassment and Bullying Policy
- Modern Slavery Policy

and the following School specific policies:

- Under 18 Policy

Version Control and Accountable officers

It is the joint responsibility of the Implementation Officers and Responsible Officer to ensure compliance with this policy.

Policy Category	Corporate			
Responsible Officer	Executive Director – People and Culture			
Implementation Officers	KBS: GM, Student Experience in liaison with Executive Director, International Education (ANZ) KP: General Manager or Head of relevant function in liaison with Business Head KIL: Operations Support Manager			
Review Date	September 2024			
Approved by				
VP, Academic on behalf of the Academic Board				
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.1	Academic Quality and Governance Team	Policy reviewed for currency, with the following changes made: <ul style="list-style-type: none"> Language refined and content moved to enhance clarity and coherency. Accountable and Implementation Officers introduced. 	06.09.2017	30.09.2017
1.2	Academic Quality & Governance	Department of Immigration and Border Protection changed to the Department of Home Affairs	08.03.2018	09.03.2018
2.0	Quality, Regulations and Standards Team	Consolidated policy to incorporate all Kaplan businesses and included New Zealand. Responsible Officer role amended. Followed standard policy template to add sections on principles, guiding procedures, relevant legislation and related policies.	28.10.2021	04.11.2021