Critical Incident Policy

1. POLICY STATUS AND DETAILS

Policy Number	6.1a
Approving Authority	Board of Directors
Date Implemented	August 2022
Current Version	6.1a BD_08_09
Date of Review	August 2024
Contact Officer	Director Learning and Innovation
Related Policies, Procedures and Documents	Student Handbook NIDA Student Charter, including the NIDA Code of Conduct Grievances, Complaints, Misconduct and Appeals Procedure – Non-Academic Fee Policy (Domestic Students) Fee Policy (International Students) Credit Transfer and Recognition of Prior Learning Policy and Procedure Course Regulation Documents WHS Policy and WHS Handbook Alcohol, Drugs and Smoking Policy Anti-Discrimination Harassment Policy Misconduct Policies and Procedures Sexual Misconduct Policy Bullying and Harassment Policy and Procedure Travel Policy NIDA Suicide Prevention Document NIDA Emergency Response Plans and Sub Plans Risk Management Framework

2. DEFINITIONS

Term	Definition
Accredited Program	A program that is recognised under the Australian Quality Framework (AQF) and is registered with one of the two main regulatory agencies, being TEQSA (Tertiary Education Quality Standards Authority) for Higher Education and ASQA (Australian Skills Quality Authority) for Vocational programs. An accredited course is one that leads to the conferral of a degree or the award of a certificate or diploma.
Critical Incident	A Critical Incident is a traumatic event or situation (within or outside Australia), the threat of a traumatic event, or a series of escalating events, which affects, or has the potential to affect a student, his/her family members and/or other persons including staff and friends, in a traumatic way, including extreme stress, fear, injury or death or that may have impact on NIDA's people business operations, assets or reputation. Student Critical Incidents include any situation deemed to be a "critical incident" under the provisions of the National Code. ▪ Critical Incidents can include, but are not limited to:

- Death, serious injury or serious threat of these
- Death of a student
- Missing student
- Attempted suicide
- Serious injury or health problem which prevents the student from continuing with or completing the course
- Medical emergencies involving a student or staff
- Mental health episode requiring hospitalisation
- Natural disaster located at or away from NIDA
- Student arrested or detained
- Assault, including sexual assault, domestic violence or robbery, severe verbal or psychological aggression
- Drug or alcohol abuse
- Campus disturbance
- Other serious events

DFAT	Department of Foreign Affairs and Trade
DHA	Department of Home Affairs
ECO	Emergency Control Organisation
Emergency	An unplanned or imminent situation generated internally or externally that may: cause harm to people; result in significant damage or loss to NIDA property, including intellectual property; and/or result in major disruption to normal operations.
EPC	Emergency Planning Committee
ESOS Act	Education Services for Overseas Students Act 2000 (Cth).
HES Framework	Higher Education Standards Framework (Threshold Standards) 2021.
National Code	The National Code of Practice for Providers of Education and Training to Overseas Students 2018 established under the Education Services for Overseas Students Act 2000.
NIDA Activities	All activities both on and off-shore undertaken by staff, students or third parties within the management and control of NIDA.
NIDA Code of Conduct	Framework outlining the rights and responsibilities of all members of the NIDA community in terms of behaviour whilst at NIDA, working for NIDA or involved in NIDA related activities offsite.
NIDA property	Any premises, facilities, machinery or equipment leased, owned, operated or supervised by NIDA, including NIDA vehicles and any location at which NIDA activities occur.
NIDA Student Charter	A document that establishes the expectations for student conduct for the duration of their enrolment. It includes the NIDA Code of Conduct.
RMSS	Risk Management and Safety Systems – name of the provider of the online incident reporting system used by staff and students

3. PURPOSE AND SCOPE OF POLICY

This policy states NIDA's approach and response to the management of critical incidents.

3.1 Purpose

The purpose of this policy is to:

- Provide a framework for the management of risks associated with critical incidents that is part of NIDA's Risk Management Strategy and aligns with the requirements of the Higher Education Standards Framework (Threshold Standards) 2021 and the National Code 2018;

- Support the enactment of clearly predefined systems and effective approaches to incidents that are categorised as critical, that may or do cause physical or psychological harm or may seriously impact NIDA's staff, students, contractors, volunteers, visitors and external clients.

- Support the health, safety, wellbeing and security of all NIDA staff, students, contractors, volunteers, visitors and external clients and help assure a safe environment that allows all students to undertake and complete their courses.

- Provide a mechanism for evaluating NIDA's response to any critical incident so as to improve response strategies and staff capabilities in the future.

3.2 Scope

- This policy applies to all NIDA locations.

- Responsibilities:

  - The CFO is responsible for leading the EMRT and overseeing the implementation of the Critical Incident and Emergency Management Plans, and also responsible for managing emergency and critical incident training, testing and compliance.
  - Responsibilities for managing specific incidents at NIDA are as described in the Register of Delegations.
  - Unless the critical incident is under the direction and control of the operator of another location, this Policy applies to the management of a critical incident that results from an incident at another location where this affects:
    - the operations of the NIDA, including the provision of services; or
    - staff or students involved in NIDA activities (e.g. student work placements, field work, exchange or study abroad, homestay accommodation for students for whom the National Institute of Dramatic Art (NIDA) has assumed welfare responsibilities under the ESOS National Code).
  - This Policy provides the framework for the management of risks associated with critical incidents. The management of specific types of incidents may be subject to their own policies, procedures and plans listed in the table below, and should be referred to in conjunction with this Policy. Any of these types of incidents may be classified as a critical incident under this Policy.

Area	Policy name
Health and Safety	WHS Policy
	WHS Handbook
Student Wellbeing	Student Handbook
	Antidiscrimination, Harassment Policy
	Sexual Misconduct Policy
	Suicide Attempt or Death on Campus Plan
	Grievance Policy and Procedure (Academic)
	Grievance Policy and Procedure (non-academic)
Staff Wellbeing	Discrimination, Bullying and Harassment Policy
	Sexual Misconduct Policy

Physical Security	Emergency Response Plan and Sub Plans
Cyber Security	Information and Technology Policy
Approved NIDA Travel	Travel Policy
Privacy	Privacy Policy
Fraud and Corruption	Whistleblower Policy

4. PRINCIPLES

At the core of NIDA's critical incident management capabilities are the following:

1) Planning and preparing - developing, documenting, training and testing arrangements, and providing information to staff and students on how to seek assistance in case of a critical incident that impacts on their wellbeing and actions they can take to enhance their personal security and safety

2) Detecting and mitigating - identifying, assessing, controlling, treating and monitoring risks;

3) Responding - making people safe, minimising damage to assets, and managing strategic issues and consequences;

4) Recording critical incidents, reporting on them to management and governance bodies and maintaining records;

5) Recovering - implementing business continuity arrangements and repairing negative impacts; and

6) Learning and adapting - reviewing and improving arrangements.

5. POLICY

5.1 NIDA has an established Emergency Planning Committee (EPC), chaired by the Chief Financial Officer (CFO). The EPC is responsible for overseeing and reviewing NIDA's Emergency Management Framework, Emergency Plans and Sub-plans, Emergency planning and preparation, training, review and compliance.

5.2 NIDA uses a risk-based, critical incident classification and escalation process that aligns with NIDA's Risk Assessment Matrix to define the level of response required to manage any incident:

- **Priority 3** – a minor incident that is a local event or issue that has no more than a minor impact in any risk category and little or no potential to escalate.
    - Can be resolved through standard BAU procedures.
    - Can be managed by local, onsite personnel that may include an Emergency Response if the incident is an emergency.

- **Priority 2** – a moderate incident will have no more than a moderate impact in any risk category but has the potential to escalate.
    - May not be able to be resolved with standard procedures and processes.
    - Needs a moderate level of resources and input to manage, this may include a business continuity response and if the incident is an emergency, it may require an Emergency Response by activating the Emergency Control Organisation (ECO).

- **Priority 1** – a critical incident that has a major, catastrophic or very high rating in any risk category and is an incident that will have a long-term effect.
    - It cannot be controlled through the usual procedures.
    - It requires a high level of resource to manage and will include Critical Incident Management and may include a Business Continuity response. If the incident is an emergency, then it will require an Emergency Response by activating the ECO (refer 5.5 for details of the ECO).

5.3 NIDA will maintain an Emergency Response Management Team (EMRT). This team will be competent and trained in NIDA's emergency responses. They will provide executive decisions and strategy for dealing with a critical incident. An incident response team, with appropriate expertise will be activated for each critical incident. The EMRT consists of:

- Chief Executive Officer
- Chief Financial Officer
- Head of Technology
- Head of HR
- Course Leader TTSM
- Producer
- Production Manager
- Head of Curriculum
- Director of Learning and Innovation
- Head of Facilities
- WHS Coordinator

5.4 The EMRT may invite experts to join team as required and depending on the nature of the incident.

5.5 The ECO is made up of:

Chief Warden Backup for Performances	**Facilities Manager** Head of NIDA Theatres
Back-up during evenings and weekends	Nominated Open staff or Tutors
Deputy Chief Warden	**Facilities and WHS Coordinator**
Fire Safety Officer	Duty Chief Warden during evenings and weekedns (normally posted at Reception)
Technical Manager	The Deputy Chief Warden role will be ssumed by the Technical Manager in Instances where the Facilities Manager, Facilities Coordinator and the Fire Safety Officer/s are not on site.
Theatres and Backstage **Assembly Area Wardens**	**Technical Supervisor on Duty** **E-Learning Technologist** (and Librarian) Senior Directors and Leaders/Managers and Tutors on duty
Communications	**Reception** or as assigned by the Chief Warden
Back up for performances Back up during evenings and weekends	Head of NIDA Theatres Nominated Open Program staff orTutor
Departmental and Classroom Wardens	**Senior Directors and Leaders/Managers and Tutors on Duty**
Accredited Course Students	May be co-opted to act as wardens including Stage Managers for NIDA Student Productions

The ECO may also invite additional experts depending on the nature of the emergency.

NIDA will complete annual training for the ECO as well as testing of associated systems.

6. PROCEDURES

6.1 Reporting and classifying incidents

Incidents can be reported through several mechanisms, including:

- RMSS, Online reporting for incident, injuries and near misses.
- Contacting Student Services.
- Contacting a Manager or Course Leader.

A preliminary classification of all incidents reported as a priority 1, 2 or 3 will be made by the receiver of the incident report.

The receiver of the incident report will immediately direct priority 2 or 1 incidents to the relevant response team.

The response team will:

- Review the incident and confirm the rating.
- Respond to and manage the incident in line with the relevant policy, procedure or plan.
- Direct any Level 1 incident to the EMRT for formal classification and further action.

The EMRT leader will consider the reported incident and, where the incident is deemed to be Level 1, will activate the ECO.

When required, the EMRT leader may need to consult with:

- Relevant State or Commonwealth agencies including NSW Emergency Services, NSW Health, Australian Cyber Security Centre, DFAT, DHA.
- SmartTraveler or NIDA's approved travel company for any travel warnings.
- Embassies and consulates.
- Internal HOD's and Managers to ascertain the impact of the incident or emergency to NIDA's activities and community.

6.2 Responding to Critical Incidents

The EMRT will:

- Review the situation
- Prioritise and allocate tasks and responsibilities and coordinate NIDA's response to the incident.
- Manage media and publicity relating to the critical incident.
- Make arrangements for notifying staff, students, parents/family and other relevant stake holders as required.
- Ensure the responding team has enough support and resources to respond to and contain the incident.
- Seek advice about any statutory or reporting obligations that arise from the incident.
- Report any incident involving fraud or corruption to the CFO.
- ensure that stakeholders and regulatory bodies, including but not limited to, the Tertiary Education Quality and Standards Agency (TEQSA), SafeWork NSW and NIDA's insurers are notified in a timely manner where required and provided with appropriate information.

The release of any personal information must comply with NIDA's Privacy Policy

6.3 Recovering from a critical incident

After managing the initial response to the critical incident, the EMRT will review actions taken and refine any plans as required and put in place a recovery plan.

When the incident has disrupted critical business activities and processes, NIDA's business continuity plan will be implemented.

6.4 Recording critical incidents

The EMRT will ensure that all action, decisions and key accountabilities are recorded and managed inline with NIDA's Recordkeeping Policy NIDA will maintain a written record and register of all critical incidents and remedial actions taken for at least two years after all students involved or affected have ceased to be enrolled.

The EMRT leader will nominate a member to update and maintain the confidential incident records. These records will be available to members of the EMRT and other persons and nominated on a need-to-know basis.

6.5 Learning and adapting

The EMRT will consider if it needs to create an Incident Investigation Team to investigate the incident. This team will investigate all aspects of the incident including cause and contributing factors. They may make recommendations to prevent the repeat of the incident. The make up of this team will depend on the nature, size and extent of the critical incident.

The Investigation team will report to the EMRT all the relevant facts, evidence, recommendations and improvement to plans, processes and training.

As soon as possible after the incident the EMRT will evaluate the management of and response to the incident. The review will be informed by the outcome of the Incident Investigation Team report.

The EMRT will report all findings to the Executive, and governance bodies as required, including cause, contributing factors, corrective action required and training recommendations.

The EMRT will review NIDA's critical incident response, emergency plans and sub-plans at least annually and propose revisions as required through the EPC.

5. CHANGE HISTORY

Date	Change Description	Reason for Change	Author	Version
July 2022	Establishment of policy	CRICOS audit feedback	CFO/WHS Manager	1.0

6. CONSULTATION/BENCHMARKING

This policy has been benchmarked against policies and practice from a number of higher education providers and other sources and we gratefully acknowledge:

- JMC
- Macquarie University
- UNSW Global

Legislation and Regulatory Frameworks	Australian Qualifications Framework
	Higher Education Threshold Standards 2021
	Education Services for Overseas Students (ESOS) Act 2000
	National Code of Practice for Providers of Education and Training to Overseas Students 2018
	Privacy and Personal Information Protection Act 1998
	Disability Discrimination Act 1992
	Disability Standards for Education 2005
	Standards for Registered Training Organisations (RTOs) 2015
	ASQA General Directions