

Critical Incident Policy and Procedure

Navitas Pty Ltd ACN 109 613 309



Document

Document Name	Critical Incident Policy
Brief Description	This Policy outlines the procedures to be followed in the event of a critical incident involving any member of the Navitas English 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 Navitas English community as a whole.
Responsibility	Director, English & Testing
Initial Issue Date	June 2008

Version Control

Issue Date	Version	Summary of Changes	Review Date
June 2008	1		
June 2018	2	Updated with National Code 2018	June 2020
June 2019	3	Updated to reflect feedback from 2019 CRICOS reregistration	June 2021
January 2023	4	Updated to reflect Navitas English campus closures due to pandemic	Jan 2025
April 2024	5	Summary of changes: *Emergency Planning Committee (EPC) as nomenclature replaced by Critical Incident Management Team (CIMT) *Critical incident communication log replaced with WHS online platform for reporting and recording all incidents *Revised escalation hierarchy reflecting current roles and title nomenclature	April 2026



1. Policy Objectives

The Critical Incident Policy and Procedure is designed to ensure that the interests of all Navitas English students and staff are managed appropriately in the event of a critical incident.

2. Distribution of this Policy

This policy and procedure is circulated to campus staff as part of induction. Navitas English security personnel and students are made aware of the policy during orientation.

3. Scope

This policy applies to all visitors, staff and students at:

- i) The Navitas English Perth campus at 211 Newcastle Street Northbridge WA 6003 and;
- ii) The Navitas English Sydney Hyde Park campus on Level 3, 255 Elizabeth Street, Sydney NSW 2000

The two campuses have differing physical security personnel arrangements, 7am to 9:30pm for Sydney campus and 4pm to 9:30pm for Perth campus, so procedure will be detailed accordingly in this policy. Where Navitas English staff witness an event that may be considered a critical incident, the policy and procedures should be followed. For any incidents occurring off campus but involving or impacting Navitas English staff or students, this policy applies.

This policy does not include cases of minor injury or cases of academic misconduct.

4. Definitions

A critical incident is a sudden, unexpected and traumatic event outside the normal range of experience of the individual or community affected but having the potential to cause death, injury, severe emotional stress or distress, destruction, loss of property, shut down or disruption of business operations. A critical incident may occur on or off-campus.

Critical Incident	These are incidents relating to but not limited to:
	Fire, explosion, gas leak
	Chemical, radiation or bio-hazard spillage
	Incidents involving siege, hostage, firearms
	Serious accidents
	Natural disaster
	Outbreak of disease
	Pandemic
	Death, serious injury or any threat of these
	Missing students
	Natural or man-made disaster
	Socio-political disruption
	Social issues such as domestic, drug or alcohol abuse
	Incidents involving mental illness
	Severe verbal or psychological aggression
	Issues related to sexual assault and sexual harassment
CIMT	Critical Incident Management Team



Designated Officer: any Navitas English staff member who is either a witness to, or first to be informed about an actual or potential critical incident. The Designated Officer is to assume responsibility for alerting the Centre Manger & Director of Studies or another member of the CIMT. The Designated Officer may need to assume temporary control of a critical incident site and assign duties to available persons (such as calling emergency services, Navitas English security and alerting other staff, assisting with first aid, crowd control etc).

CIMT: The Critical Incident Management Team will be responsible for the formulation, implementation and management of the critical incident response and resource allocation. The CIMT will maintain relationships and liaise with any other appropriate external organisations including La Trobe and Western Sydney University campuses who share the same building as Navitas English Sydney, and with pathway partners whose students may be impacted. The CIMT will consist of, but will not be limited to, the following staff members:

Navitas English Perth's CIMT

- Director, English & Testing
- Director, Centre Operations (DCO)
- Centre Manager & Director of Studies (CM-DoS)
- Assistant Director of Studies (ADoS)
- Student Services & Experience Manager (SSEM)
- First Aid Mental Health Officers (FAMHOs)
- First Aid Officers (FAOs)

Navitas English Sydney's CIMT

- Director, English & Testing
- Director, Centre Operations (DCO)
- Centre Manager & Director of Studies (CM-DoS)
- Assistant Director of Studies (ADoS)
- Student Services & Experience Manager (SSEM)
- First Aid Mental Health Officers (FAMHOs)
- First Aid Officers (FAOs)

Escalation Hierarchy

Every critical incident is unique and may need to be dealt with differently, according to the needs of people affected and severity. The table below serves as a risk guideline and escalation hierarchy when assessing a critical incident. Most CIMT team members work as a group responsible for their respective campuses as onsite employees but as per the table below, the CIMT will liaise with senior levels of Navitas' divisional management when severe-risk incidents occur or have a potential to occur. The escalation hierarchy are to be contacted and informed in conjunction with the Critical Incident Procedure in section 6 below i.e. the Designated Officer may contact emergency services and Navitas security in the first instance and depending on their initial assessment of the situation.



LEVEL OF RISK:	RESPONSIBILITIES:	EXAMPLES:
Severe	UPA CEO UPA EGM Head of HR Head of WHS Corporate Communications Team Director, English & Testing Director, Centre Operations (DCO) Centre Manager & Director of Studies (CM-DoS)	Death, suicide, life-threatening injury deprivation of liberty, threats of violence, assault, rape/sexual assault and harassment, burglary, use of firearms, threat of widespread infection and or contamination, fire, bomb, explosion, gas/chemical hazard, pandemic
Significant	Director, Centre Operations (DCO) Centre Manager & Director of Studies (CM-DoS) Assistant Director of Studies (ADoS) Student Services & Experience Manager (SSEM) First Aid Mental Health Officers (FAMHOs) First Aid Officers (FAOs)	Severe Health and Safety Risk, serious injury incurred by either staff or student, evacuation of building is necessary, missing student, incident involving U18 student
Moderate	Centre Manager & Director of Studies (CM-DoS) Assistant Director of Studies (ADoS) Student Services & Experience Manager (SSEM) First Aid Mental Health Officers (FAMHOs) First Aid Officers (FAOs)	Suspicious package unattended, Health and Safety Risk, illness of staff or student

The Navitas Group have a separate, stand-alone policy that covers all Navitas divisions, business units and functions: **Immediate Incident Escalation and Reporting policy**. This Navitas Group policy provides additional policy and process on the escalation and reporting of incidents that involve risk of:

- Moderate and major reputational damage
- Moderate and major regulatory investigations or breaches
- Significant operational or supply chain disruptions
- Material litigation claims (resulting in losses of more than AUD \$150,000)
- Material customer client issues (resulting in losses of more than AUD \$500,000)
- Material whistle-blower report
- Major cybersecurity incident or privacy breach
- Fraud
- Significant negative public media coverage
- Environmental harm
- Significant event causing harm to indigenous cultural heritage and/or culture
- Significant event causing harm to local communities
- Notification of significant public protest or demonstration



Other incidents likely to cause catastrophic consequence

Critical Incident Procedure

Whilst every critical incident is unique, it will be dealt with according to the circumstances and the cohort of people affected. In the first instance, and if appropriate to the circumstances, the response to most critical incidents will be the notification of the emergency services (police, ambulance, fire brigade) followed by Navitas security. There may be situations where security is notified first, and they will contact the relevant emergency service. Notification should include the type of incident, the exact location and details of any person or persons who might be injured, in distress, or at risk.

- 6.1 The Designated Officer (see definition) is to assess the situation and consider any risks to their own or others' safety. If there is a threat to anyone's safety or the safety of students and other staff around, they are to be alerted and removed to a safe location. Every effort must be made to contact the CIMT members once it is safe to do so.
- 6.2 Each situation is different. If the situation is life-threatening, 000 is rung first, Navitas security second (if during the evening for the Perth campus and with all-day security at the Sydney campus) and reception third. If the situation is not life-threatening, the Designated Officer's own judgement is to be used. The Designated Officer or other staff member is sent to reception and Navitas security is called. Security will decide whether to contact the relevant emergency services.
- 6.3 Where the Designated Officer considers a critical incident to be apparent or likely, they must alert a CIMT member and preferably the CM-DoS as the overarching campus manager.
- 6.4 After alerting the relevant person/s and provided there is no threat to personal safety in doing so, the Designated Officer is to assess the practical needs to stabilise the immediate environment.
- 6.5 The immediate response to any critical incident will be the assessment, planning and the rapid implementation of intervention needs. When notified by the Designated Officer, the CM-DoS or another member of the CIMT is to assume responsibility for re-assessing the incident and for convening a meeting of the CIMT if deemed necessary where the task would be to:
 - Develop a profile of the incident: What has happened? Who has been affected by the incident? How might it have affected them?
 - Decide on the range of supportive actions which can be offered to students and/or staff members affected by the incident. This may include:
 - Notification of counselling services (within the first few hours)
 - Establishment of a quiet area for the use of victims and/or their families. This area
 will be protected from intrusion by anyone not immediately involved in the incident
 - Evaluate which individuals/organisations need to be involved and what their potential roles might be
 - Re-establish a sense of personal control, by considering linking students to parents/care givers and significant others
 - Decide: when, how and what to communicate to parents, staff and students regarding the incident. This may include: briefing staff and establishing a central information point to provide up-to-the-minute, accurate information to staff, students, and families
 - Advise the UPA CEO, UPA EGM and the Director, English & Testing of the incident. If relevant, direct all enquiries from the media to the Corporate Communications Team (<u>mediaandcomms@navitas.com</u>) as per the Media, Social Media and Speaking Policy



Assessment will be ongoing until the incident is resolved

7. Students Under 18 Years of Age

- 7.1 In the absence of a parent, a legal guardian or a suitable relative, Navitas English assumes full responsibility for the accommodation, support and general welfare arrangements of students under the age of 18.
- 7.2 On systematically identifying a student under 18 years of age, in their class, teaching staff have the duty to ensure that these students remain safe in the classroom, and in the case of an emergency, in the building and in the designated assembly area.
- 7.3 If an under 18 student is absent for one (1) day the process is:
 - i) Teachers' class roles have all U18 students clearly highlighted
 - ii) Teachers notify senior teachers via a link on their class rolls to a central report (checked by senior teachers daily) identifying any U18 student who has been absent for one full day of study
 - iii) Upon notification, the senior teacher calls the student as soon as practicable (same day) to check welfare. If no response, the student is sent a text asking them to reply to confirm they are safe and well (or to provide an explanation otherwise)
 - iv) If no contact is made, the senior teacher notifies either the SSEM or CM-DoS as the centre's primary contacts who will call the student again as soon as practicable (if not the same day, no later than the following day)
 - v) If no contact is made, either the SSEM or CM-DoS will contact one of the following contacts (who depends on factors such as location and who has been provided at the application stages): the emergency contact, the carer, the parent or legal guardian, a homestay parent, the agent, known friend of the student
 - vi) If no contact or update is provided still, either the SSEM or CM-DoS will contact the police as a missing person
- 7.4 Similarly, where Navitas English becomes aware of, or has reasonable justification to suspect that, an under 18 student has been involved in any incident or allegation involving actual or alleged sexual, physical, or other abuse, the CIMT must be contacted immediately, and the authorities notified as per state legislation required under the child mandatory reporting laws.
- 7.5 If the situation necessitates that the student be removed from their usual place of living, Navitas English will place the student in emergency accommodation. Navitas English partner with the Australian Homestay Network (AHN) as the sole homestay provider for U18 students. AHN have a 24/7 emergency support line and documented policies for managing critical incidents in addition to an AHN sexual harassment and abuse prevention policy

8. Evacuation

8.1 Both Navitas English Perth and Sydney campuses are equipped with alarms which will be used to warn people in an emergency. The alarm will be raised by the Chief Fire Warden and/or Fire Wardens. Upon hearing the evacuation alarm, staff and students are asked to be aware that there is a real or potential emergency in the building. Upon hearing the alarm or upon being instructed to evacuate, staff and students should obey any directions given by fire wardens and assemble at the nominated emergency evacuation point.

Navitas English's evacuation point in Perth is at Errichetti Place and in Sydney its evacuation point is Hyde Park opposite Telstra House. Staff and students are made aware of the location



of these assembly points during fire and evacuation drills, in orientation and onboarding and as displayed by fire evacuation diagram on both campuses.

- 8.2 Students under the age of 18 must be supervised by a teacher.
- 8.3 At all times, staff and students are required to follow instructions from emergency services personnel (police, fire brigade, ambulance).

9. Missing Students

Please refer to clause 7.3 of this policy document. In addition to this critical incident policy, Navitas English's attendance policy includes the process of reporting all absentee students. Whereas in clause 7.3 ii) of this policy under 18 students are contacted by Navitas English staff to check welfare after one full day of absence from class, students who are 18 years old and above are contacted via the same process but after being absent from class for 3 full consecutive days from class. These welfare check processes are outlined in student orientation and in onboarding documentation for teaching staff.

10. Sexual Assault and Sexual Harassment (SASH)

Issues relating to SASH are considered a critical incident and categorised a severe risk as per the escalation hierarchy table in this policy. The procedure for such cases may differ from the general incident procedure as per section 6 of this policy in order to apply the appropriate levels of confidentiality. Navitas English sits within the University Partnerships Australasia division which has a Sexual Assault Prevention and Response Policy which therefore applies to Navitas English and is available in Navitas' Policy Hub.

SASH training is a mandatory requirement for all Navitas employees and training is conducted online via HR shared services as part of a prevention strategy. Managers and key staff have a duty to prevent SASH and may be held responsible unless all reasonable steps have been taken to prevent or eliminate an issue.

- 10.1 Reporting all staff have a responsibility to:
 - report any incidences of SASH that they witness to a CIMT member, preferably to the CM-DoS as overarching manager at each campus location
 - respond to all complainant's calls for assistance and report to a CIMT member, preferably to the CM-DoS as overarching manager at each campus location
 - · maintain confidentiality of information provided during an investigation of a complaint
- 10.2 Witnessing a person experiencing SASH all staff:
 - should refuse to join in with any sexually harassing behaviour
 - can back them up or support the person to say no to the harassment
 - can offer to act as witness
- 10.3 What a victim of SASH can do:
 - if possible and if they feel able to, promptly speak to the offender directly or in writing to say their behaviour is offensive and unacceptable and request it stop immediately
 - · report and seek advice from the campus management staff
 - when harassers seem dangerous (e.g. they are refusing to leave the premises and/or demonstrating threatening behaviour) call for security to contact the police before reporting to the campus management staff



lodge a complaint to the campus management staff who will act upon the complaint

Once a SASH incident has been reported to campus management, the relevant CIMT member should take any action to ensure the immediate safety of the complainant and any other stakeholders, ensure appropriate confidentially is maintained and report the incident as per the escalation hierarchy in section 5 of this policy whereby an investigation will ensue.

11. Post Incident Management

The CIMT, in conjunction with Navitas divisional managers depending on the significance of the incident, will convene within 48 hours following a critical incident to determine what follow-up procedures must be implemented in the areas of counselling, information dissemination, debriefing and the continued allocation of personnel. Post incident management responses may include:

- Disseminating information to all staff, students and their families of the incident and establishing post-incident communications and processes
- Monitoring the need for counselling and maintaining contact with staff and students who are likely to need ongoing support
- Psychological debriefing of students and staff after the incident (except if legal processes contra-indicate)
- Notifying embassies and consulates
- Training workshops in stress management and coping strategies
- Liaising with the families of affected students. If necessary, interpreters will be appointed
- Arrangements for visits from family, including accommodation travel and expenses
- · Liaising with police, hospital and other medical staff
- Funeral, memorial or repatriation service arrangements
- Death notices
- Administrative/enrolment matters including fee refunds
- Reporting a Student Course Variation on PRISMS to cancel student's CoE
- Assisting students with access to legal services
- Personal items and affairs (household and academic) of students
- Monitoring reactions within the campus, including significant dates and anniversaries
- Encouraging teaching and administrative staff to continue to be alert in recognising post-traumatic reactions
- Allowing opportunity for the campus community to continue to talk about the incident and their reactions and offering support where needed
- Disseminating regular and up to date information via email to the campus community
- Monitoring media coverage as this may continue to cause distress to staff and students

12. Review

Once a critical incident is resolved, the CIMT will evaluate the critical incident response which will form the basis of subsequent and improved responses.



Staff and students will be encouraged to provide their thoughts and experiences in order to assist in the review process.

13. Keeping Accurate Records

Navitas uses a WHS digital platform whereby staff are instructed to log detail of all incidents in addition to potential incident hazards. All staff undergo mandatory online training for these WHS aspects in their onboarding phase and the platform is accessible via the Navitas intranet and via QR codes which are displayed on campus. The platform can be accessed via mobile phones and laptop devices.

Once submitted electronically, a member of the HR WHS team reviews the incident and contacts the sender for any necessary follow up actions. All incidents are filed for a minimum of 5 years.

14. Post Incident Staff and Student Support

All staff have access to an Employee Assistance Program on behalf of Navitas Ltd whereby free initial counselling if offered to employee and/or immediate family members. Both Navitas English Perth and Sydney campuses ensure they have trained first aid mantal health staff and first aiders to assist for both staff and students. They can also assist with trusted third-party counselling services for staff and student to be referred to. Navitas English staff will assist students for any medical or counselling needs via their overseas medical insurance plans.

15. Privacy

In accordance with the Privacy Act 1988 and National Privacy Principles, individuals are entitled to and shall be granted the protection of their personal and private information. However, Navitas English will exercise its discretion and may disclose information in the following circumstances:

- 15.1 If Navitas English reasonably believes that the use or disclosure is necessary to lessen or prevent a serious and imminent threat to public safety or an individual's life, health or safety.
- 15.2 If Navitas English has reason to suspect that unlawful activity has been, is being or may be engaged in, and uses or discloses personal information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities; or the use or disclosure is required or authorised by or under the law.

16. Related Documents

- Emergency Evacuation Plan Sydney
- Emergency Evacuation Plan Perth
- Sydney Hyde Park Student Handbook
- Perth Student Handbook
- Immediate Incident Escalation and Reporting Policy
- Sexual Assault Prevention and Response Policy
- Student Code of Conduct
- Staff Code of Conduct



• Media, Social Media and Speaking Policy

17. Key Positions and Contacts at Navitas English

Navitas English Perth – 211 Newcastle St. Northbridge WA 6003 INTERNAL

Director, Centre Operations	+61 412 905 980
Centre Manager & Director of Studies	+61 8 6330 1621
Assistant Director of Studies	+61 8 6330 1612
Student Services Manager	+61 482 165 875
Reception staff	+61 8 6330 1600
24-hour emergency number	1800 628 482 (or 1800 NAVITAS)

Navitas English Sydney Hyde Park – 255 Elizabeth St, Sydney NSW 2000 INTERNAL

Director, Centre Operations	+61 412 905 980
Centre Manager & Director of Studies	+61 2 8246 6854
Assistant Director of Studies	+61 2 9025 4725
Student Services Manager	+61 2 9025 4727
Reception staff	+61 8 6330 1600
24-hour emergency number	1800 628 482 (or 1800 NAVITAS)

18. Emergency and Support Services

Navitas English Perth

Campus Security	Southern Cross Security
	<u>zubair.waliuzzaman@sxprotection.com.au</u>
	0415 446 763
EMERGENCY SERVICES	
Police, Ambulance, Fire	000
Local police station – missing person etc	(08) 9422 7111
State Emergency Service Perth	132 500
National Security Hotline	1800 123 400
	Australian National Security
HOSPITALS & MEDICAL	
Local hospitals	Royal Perth hospital, Victoria Square, Perth WA (08) 9224 224
	South Perth hospital, 76 South Terrace, South Perth WA (08) 9367 0222



	Fiona Stanley hospital, 11 Robin Warren Drive, Murdoch WA (08) 6152 222		
Nurse-On-Call	Provides immediate expert health information 24/7		
	1800 022 222		
	http://www.healthdirect.gov.au/		
Allianz medical insurance for	1800 814 781		
overseas students	http://www.oshcallianzassistance.com.au/		
The Crisis Assessment Treatment Team (CATT)	For immediate treatment of psychotic episodes, self-harm, feeling suicidal and loss of control		
	Call the nearest hospital first and then try 1800 676 822 (Mental Health Emergency Line for WA)		
COUNSELLING SERVICES			
Lifeline	Call 13 11 14 or text 0477 13 11 14 or chat online:		
	<u>Lifeline Australia – 13 11 14 – Crisis Support. Suicide Prevention.</u>		
Beyond Blue	Call 1300 22 4636 or chat online:		
	Beyond Blue 24/7 Support for Anxiety, Depression and Suicide		
	<u>Prevention – Beyond Blue</u>		
Kids helpline	Call 1800 55 1800 or chat online:		
	Kids Helpline Phone Counselling Service 1800 55 1800		
	Includes services for 5 to 17-year-olds plus young adults 18 to 25-year-olds		
MensLine Australia	1300 78 99 78		
Griefline	1300 845 745		
	https://griefline.org.au/		
Suicide Helpline	1300 659 467		
	http://www.suicidecallbackservice.org.au/		
Sexual Assault Resource Centre (SARC) WA	1800 124 or (08) 6496 0001		
COMMUNITY BODIES			
Australian Red Cross	1800 814 781		
	http://www.redcross.org.au/		
Salvation Army	1300 627 727		
	http://www.salvos.org.au/		
SPECIALIST SERVICES			
Homicide Victim Support	1800 191 777		
Group	http://hvsg.com.au/		
Funeral Advice	1300 363 350		
	http://www.funeraladvice.com.au/		
Road Trauma Support	(02) 9542 4029		
	http://www.enoughisenough.org.au/counselling-and-		
	psychology/road-trauma-network/		



Navitas English Sydney Hyde Park

Campus Security	(02) 9964 6113
	Email: security.255ES@navitas.com
EMERGENCY SERVICES	
Police, Ambulance, Fire	000
Local police station	(02) 9265 6499
State Emergency Service Sydney	13 25 00
National Security Hotline	1800 123 400
	<u>Australian National Security</u>
HOSPITALS & MEDICAL	
Local hospitals	St Vincent's hospital, Victoria St. Darlinghurst (02) 8382 111
	<u>Welcome To St Vincent's Public Hospital Sydney - St Vincent's</u> <u>Hospital Sydney (svhs.org.au)</u>
	Sydney hospital, Macquarie St. Sydney (02) 9382 7111
	http://www.seslhd.health.nsw.gov.au/sydney-eye-hospital
	Royal Prince Alfred hospital, Missenden Rd, Camperdown (02) 9515 6111 http://www.slhd.nsw.gov.au/rpa/
Name of Call	
Nurse-On-Call	Provides immediate expert health information 24/7 1800 022 222
	http://www.healthdirect.gov.au/
Allianz medical insurance for	1800 814 781
overseas students	http://www.oshcallianzassistance.com.au/
The Crisis Assessment Treatment Team (CATT)	For immediate treatment of psychotic episodes, self-harm, feeling suicidal and loss of control
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	Beyond Blue 24/7 Support for Anxiety, Depression and Suicide
	Prevention – Beyond Blue
Kids helpline	Call 1800 55 1800 or chat online:
	<u>Kids Helpline Phone Counselling Service 1800 55 1800</u> Includes services for 5 to 17-year-olds plus young adults 18 to
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Griefline	1300 845 745
	https://griefline.org.au/
Suicide Helpline	1300 659 467
	http://www.suicidecallbackservice.org.au/
NSW Rape Crisis Centre	1800 424 017
	http://www.nswrapecrisis.com.au/



COMMUNITY BODIES	
Australian Red Cross	1800 814 781
	http://www.redcross.org.au/
Salvation Army	1300 627 727
	http://www.salvos.org.au/
SPECIALIST SERVICES	
Homicide Victim Support	1800 191 777
Group	http://hvsg.com.au/
Funeral Advice	1300 363 350
	http://www.funeraladvice.com.au/
Road Trauma Support	(02) 9542 4029
	http://www.enoughisenough.org.au/counselling-and-
	<u>psychology/road-trauma-network/</u>