Critical Incident Policy and Procedure

Purpose

The purpose of this document is to set out the policy and procedure adhered to by Universal Education Centre Pty Ltd (trading as Universal English College and herein referred to as "UEC" or "the college") and its staff with respect to critical incidents.

The core principle of this policy is to confirm that UEC recognises its duty of care to its students, staff, visitors and other stakeholders and will ensure every reasonable effort is made to ensure the safety and wellbeing of all its students, staff, contractors, and other relevant parties in cases of actual or threatened critical incidents. Through this policy, UEC also confirms that it complies with all legislative and regulatory requirements relating to such incidents, including those set out in the ESOS framework, such as the requirements set out in the National Code 2018 Standard 5 and Standard 6.

In all its activities, UEC prioritises the protection of the rights, safety, and wellbeing of its students and staff as well as protection of the reputation of UEC and of the Australian international education industry as a whole.

Scope

This document and the policy and procedure set out in it apply to all activities related to critical incidents and to all relevant individuals and/or organisations exposed to and/or impacted by such incidents whether on or off campus or overseas.

This document and the policy and procedure set out in it exist in the context of the UEC risk management framework and of all other UEC Policy and Procedure documentation, particularly the UEC Student Support and Premises policies.

© Universal Education Centre Pty Ltd 2025

Definitions

For the purposes of this document, the below terms and associated definitions are clarified.

Critical Incident

Any event which causes or is perceived as threatening serious negative impact on the health and/or welfare of one or more individuals. Critical incidents may include, but are not necessarily limited to events involving:

- Death;
- Serious accident, injury, or illness;
- Deprivation of liberty, acts of violence, sexual assault, aggravated burglary;
- Any other sudden event that has serious impact on the health and/or wellbeing of one or more students or staff
- Any other sudden matter causing serious disruption to operations of UEC or to the provision of essential services, such as classes and accommodation.

A critical incident may involve:

- An accident or illegal act that causes or threatens to cause serious physical or emotional damage to one or more persons;
- A fire, bomb, explosion, gas/chemical hazards, discharge of firearms, biological or chemical weapons;
- A natural disaster e.g. earthquake, flood, windstorm, hailstorm;
- A serious infectious disease;
- Civil unrest;
- Serious Workplace Health & Safety (WHS) incident;
- Serious damage to essential facilities.

Policy Details

Below are the specific details of UEC's Critical Incident policy.

1. UEC is committed to taking all reasonable steps to ensure the safety and wellbeing of individuals and organisations related to it, including all its students and staff. UEC is committed to ensuring its actions and resources support effectively preparing for and dealing with sudden, emerging, and potential critical incidents in accordance with its duty of care and with all legislative and regulatory requirements that govern UEC and its operations, including the requirements set out in the ESOS Framework.

2. UEC will take a proactive approach to preparing for critical incidents by considering potential critical incidents, their likelihood of occurrence and their likely impact and developing plans for how it will avoid, minimise, prepare for, and respond to their threat or occurrence.

© Universal Education Centre Pty Ltd 2025

3. UEC will ensure appropriate and sufficient resources and capability are in place to follow through on its critical incident plans, including but not necessarily limited to ensuring:
    a. staffing and empowering a designated critical incident team,
    b. effective critical incident planning and preparation processes
    c. effective critical incident identification procedures
    d. reasonable and appropriate risk reduction steps are taken
    e. the detailing of incident-specific response and communications procedures,
    f. appropriate and timely training is undertaken
    g. appropriate equipment and information resources are made available,
    h. appropriate service, system, and infrastructure resilience
    i. appropriate and timely engagement with emergency services organisations,
    j. effective record keeping and reporting, and
    k. provision of ongoing support for those impacted by incidents.

4. UEC recognises the seriousness of infectious diseases, such as COVID19, and takes all reasonable precautions to minimise the risk of exposure to and transmission of infectious diseases for its students, staff, contractors, and partners in connection to its premises and activities by ensuring:
    a. timely awareness and communication of risks,
    b. adherence to government enforced travel and interaction restrictions,
    c. appropriate physical distancing,
    d. workplace and personal hygiene practices,
    e. health checks of individuals attending UEC premises and activities
    f. information sharing and contact tracing protocols.

5. UEC will ensure it takes appropriate steps to pursue continuous improvement of its approach to preparing for and responding to critical incidents. This will include periodic reviews, post-incident reviews, and reviews instigated through updates to best practice guidelines from external bodies.

Procedure Details - General

Below are the general procedures for implementation of the above-detailed policy to be followed by UEC staff.

6. Responsibility for approving and ensuring the effective maintenance and implementation of this policy is held by the Managing Director. Should this role be vacant for any reason, the responsibility immediately escalates to the Board of Directors of UEC.

7. As per the details of the Governance and Compliance Policy, this policy and procedure will be reviewed at least annually (i.e. within 12 months of its latest update) and will be updated whenever is required by any changes in the regulatory or legislative requirements that govern UEC, in its marketing, student recruitment, or enrolment practices, or other changes that might require its review.

8. As per the details of the Governance and Compliance Policy, this policy and procedure will be made available by UEC to all relevant stakeholders.

© Universal Education Centre Pty Ltd 2025

9. All staff, contractors, or partners to whom this policy applies are made aware of this policy and procedure, are supported to understand its contents, and trained to follow its directives through:
    a. Effective induction of new staff, contractors, and partners; and
    b. Ongoing training of new and existing staff, contractors, and partners; and
    c. Any other means deemed appropriate from time to time.

Procedure Details – Critical Incident Planning

Below are the specific elements of the implementation of the above-detailed policy to be followed in preparing for and separate to the occurrence of a critical incident.

10. The Managing Director is responsible for maintaining an UEC Critical Incident Team (CIT) – detailed in Schedule 1 of this document – which will work to ensure appropriate planning for and resourcing of critical incident readiness as well as coordinating the response to any actual or threatened critical incident.

11. The CIT will establish a Critical Incident risk matrix which identifies potential critical incidents, their likelihood and consequences. This will include giving attention to incidents that may arise from:
    a. Serious accidents on or near a campus
    b. Fire or hazardous material on or near a campus
    c. Severe weather conditions or natural disasters impacting a campus or other locations where students and/or staff reside
    d. Serious infectious disease incidents on or impacting the campus location or any individuals who attends a campus or who interact with one or more individuals who attend a campus including where there is a relevant degree of separation
    e. Criminal activity perpetrated on or significantly affecting students and/or staff
    f. Threats of serious violence made toward or impacting students or staff
    g. Other matters that may be a concern from time to time and may involve significant risk to the health, well-being, or safety of students and/or staff.

12. The Critical Incident Risk Matrix will align with the UEC risk management framework and will identify the likelihood and the consequence of risks. The risk ratings are set out in the table below with the following definitions being used in the matrix:
    a. **Very Likely**: Expected to occur regularly or in specific known and commonly occurring circumstances
    b. **Likely**: Expected to occur at some time or in specific known but not particularly commonly occurring circumstances
    c. **Possible**: May occur at some time
    d. **Unlikely**: Not likely to occur in normal circumstances
    e. **Very Unlikely**: Could foreseeably happen only if multiple unrelated factors coincide, but probably never will

© Universal Education Centre Pty Ltd 2025

f. **Minor**: Involving minor injuries or discomfort. Ranging from no medical treatment required or measurable physical impact to minor treatment required for superficial physical impact
g. **Moderate**: involving injuries or illness requiring medical treatment with temporary impairment
h. **Major**: injuries or illness requiring immediate hospitalisation and potentially leading to permanent impairment
i. **Severe**: injuries or illness leading to major permanent impairment or death

	Minor	Moderate	Major	Severe
Very Likely	Medium	High	Severe	Severe
Likely	Low	Medium	High	Severe
Possible	Low	Low	High	High
Unlikely	Very Low	Low	Medium	Medium
Very Unlikely	Very Low	Very Low	Low	Medium

13. For each risk listed on the matrix a detailed Risk Response Plan will be drawn up as per the template in Schedule 2 of this document. These will cover:
    a. What actions will be taken, when and by whom, to remove or reduce the likelihood of the risk occurring,
    b. What actions will be taken, when and by whom, to lessen the impact of the risk should it occur,
    c. The details of the immediate action steps that will be taken to address an occurrence,
    d. The roles taken by staff, emergency service professionals, and other stakeholders,
    e. The individuals and organisations that will be contacted, how, and in what order,
    f. The recording and reporting that will take place during and after the event,
    g. The follow up actions taken once any immediate risk has been appropriately addressed,
    h. Where, how, when, and by whom the Risk Response Plan will be stored, updated, and communicated.

14. The CIT will meet at least once per year to review the critical incident risk matrix and the Risk Response Plans and make any amendments to ensure all planning, resourcing, and people are up to date and available.

© Universal Education Centre Pty Ltd 2025

15. During induction, all new staff and students will be made aware of how and when to report actual and or threatened critical incidents. Further information and/or training may also be given in identifying, reporting, and responding to critical incidents – actual or threatened – as detailed in individual Risk Response Plans.

Procedure Details – Immediate Response

16. In any instance that any member of UEC staff becomes aware of any critical incident occurring or the threat of a critical incident, they will immediately ensure that the most senior UEC staff member present is aware of the event or threat and assumes the role of 'Emergency Officer'. If there are no other staff members present, they will themselves assume the role of 'Emergency Officer' responsibility until a more senior staff member takes over.

17. The Emergency Officer has, for the duration of the immediate response to the critical incident, responsibility for responding to the incident and directing the actions of students and other staff so as to minimise any harm caused by the incident.

18. The Emergency Officer will in the first instance follow the 'CLAPS' approach which is defined as:
    a. Controlling the situation: Stop, take a breath, take charge of people and traffic
    b. Look for hazards: Look for anything that might cause further harm to people and point at and loudly name the risk
    c. Assess the situation: Assess the risk of further harm to people and gather information about what has happened
    d. Protect and Prioritise: Remove any dangers and/or remove any people from the vicinity of dangers, use protective equipment, triage any casualties
    e. Signal for Support: Call emergency services and/or call for support from other UEC staff or people on the scene and notify the UEC Critical Incident Team.

19. Until another staff member or an emergency services professional confirms directly that they have taken over responsibility for the care of any individuals impacted by an incident, the Emergency Officer will maintain command of the situation.

20. As and when appropriate the emergency officer will ensure the collection of the name and contact details of any person present just prior to, during, or immediately after the incident and provide that list to the emergency officer.

Procedure Details – Infectious Disease Outbreak

© Universal Education Centre Pty Ltd 2025

21. The Managing Director is responsible for maintaining ongoing awareness of threats of serious infectious diseases, such as COVID19, and of any compulsory or recommended actions and/or restrictions by federal, state or local authorities.

22. In any case that the Managing Director becomes aware of a serious infectious disease threat, the CIT will convene within five days to develop a specific Risk Response Plan following the template in Schedule 2

23. In developing the Risk Response Plan to address the threat of the infectious disease, the CIT will take into account the advice provided by state, territory and federal governments, including:
    a. Any advice provided at https://www.health.gov.au/ or at https://www.safeworkaustralia.gov.au/ ,
    b. Any legal restrictions and/or obligations introduced to jurisdictions in which UEC has an operation,
    c. The appropriacy of and approaches to enabling students and staff to study and/or work from home or other distant locations,
    d. The appropriacy of and approaches to implementing 'physical distancing' of individuals attending any UEC premise or activity,
    e. The best approaches to personal hygiene and protection, including handwashing and use of personal protective equipment such as face masks and gloves,
    f. The best approaches to cleaning and sanitising of UEC premises,
    g. The most appropriate methods of screening and/or monitoring symptoms of individuals attending any UEC premise or activity,
    h. The most appropriate approaches to retaining records of and contact details for any individuals attending an UEC premise or activity,
    i. Requirements and recommendations on immediate actions to be taken in the case that an individual who has attended an UEC premise or activity is diagnosed as having the infectious disease or that an individual who has attended an UEC premise or activity has come into close contact with an individual who has been diagnosed as having the infectious disease,
    j. The potential impact of an outbreak on UEC operations and its provision of services, including classes and accommodation, to its students and any resulting impact on the obligations on UEC relating to the ESOS Framework and/or the VET Quality Framework,
    k. The most appropriate and effective means of communicating the risks and the measures being taken to students, staff and other stakeholders, with an awareness of the specific challenges that international students may have with understanding this information in English.

Procedure Details – Emergency Care

24. If a critical incident occurs and an impacted individual appears unconscious, the Emergency Officer will follow the DR ABC approach which is defined as:
    a. D – Danger: check the vicinity and the victim to ensure it is safe to assist the victim,

© Universal Education Centre Pty Ltd 2025

b. R – Response: check the victim for a response – if responsive, make comfortable; if not responsive continue,
c. A – Airway: open victim's mouth; if blocked, turn victim on side and clear airway,
d. B – Breathing: check for breathing; if breathing, monitor; if not breathing, start CPR,
e. C – CPR: Start CPR (30 compressions, 2 breaths); continue until victim responds or help arrives.

25. When handing over to another staff member or an emergency services professional the Emergency Officer will follow the AMIST approach which is defined as:
    a. A – Age and name of hurt individual,
    b. M – Mechanism of injury or how it happened,
    c. I – Injuries or complaints,
    d. S – Sign and symptoms: pulse rate, breathing rate, skin colour etc,
    e. T – Treatment and what you have done.

Procedure Details – Immediately Post-Incident

26. Immediately after handing over to another staff member or an emergency services professional the Emergency Officer will take any actions directed by the person assuming control of the situation. Once those actions are complete, the Emergency Officer will report to the Managing Director to make an initial report on the situation and receive whatever care and attention deemed appropriate.

27. The Managing Director will support the Emergency Officer and other witnesses as appropriate to complete the Critical Incident Report Form immediately or as soon as possible after the incident.

28. The Managing Director will direct all communications with the emergency contacts of any individual impacted by the incident as appropriate.

29. The Managing Director will direct communications with those persons identified as present just prior to, during, or immediately after the incident, ensuring they are given medical and or psychological support as and if necessary and any relevant report statements are collected.

30. Where the accommodation and/or other welfare services of any students who are under the age of 18 are impacted, the Managing Director will immediately contact each affected u18 student's parent and/or legal guardian and take appropriate action to ensure the student's safety and wellbeing including by arranging appropriate emergency accommodation and/or welfare services. If for any reason, it is not possible to arrange appropriate emergency accommodation and/or welfare services, the Managing Director will immediately communicate this along with relevant contextual information to the student's parent and/or legal guardian, immigration, and local authorities, such as the local state or territory Police.

Procedure Details – Post-Incident Follow Up

© Universal Education Centre Pty Ltd 2025

31. The Managing Director will direct the post incident response which may include, but is not necessarily limited to:
    a. Ensuring any individual impacted is receiving the medical care required,
    b. Communicating with and monitoring of the well-being of any individual impacted by the incident,
    c. Communicating the availability of counselling and/or other relevant support services,
    d. Communicating the need to be attentive to any potential signs of delayed physical or psychological impact requiring care,
    e. Directing the clean-up and repair of any damage to UEC property,
    f. Restoring normal operations and services,
    g. Continuing to appropriately inform all impacted of the outcomes and actions arising from the incident,
    h. Supporting students to make contact with families, carers, agents, employers or other relevant parties,
    i. Communicating with authorities and relevant government bodies, including immigration,
    j. Supporting next of kin with arrangements, including memorial services, legal and financial matters, and/or other culturally important activities,
    k. Addressing any and all interactions with public media.

32. Where classes and/or student accommodation arrangements are impacted the PEO will direct any measures to support impacted students.

Procedure Details – Post Incident Review

33. Within 5 working days of finalising the response to a critical incident or serious threat of such an incident, the CIT will hold a meeting to review any and all reports on the incident, assess the effectiveness of the response, and assess the efficacy of preparations and planning. This will include a review of the Critical Incident Register and the Risk Response Plan.

34. The CIT will summarise the outcomes of this meeting in a report with the CIT's findings and recommendations and share this with the Managing Director. The Managing Director will then finalise planning of any improvements or adjustments to be made and document an implementation schedule.

35. Any changes implemented will be recorded as part of the ongoing improvement records and form part of the college's management and governance reporting.

© Universal Education Centre Pty Ltd 2025

In Compliance With

The various elements of this document have been developed to comply with the requirements under the ESOS framework, including, but not necessarily limited to:

National Code 2018: Standard 5 and 6

© Universal Education Centre Pty Ltd 2025

Schedule 1

Critical Incident Team Register

Position	Position Holder	Name	Responsibility
CIT Director	Managing Director	Jim Zheng	Executive Sponsor & champion CIT priorities
CIT Manager	Campus Director	Richard Pincus	Manage and lead the CIT
CIT (Delivery Location) Coordinator	Student Services Team Leader	Vanessa Leong	Coordinate activities and input for (Delivery location) Campus

© Universal Education Centre Pty Ltd 2025

Schedule 2

Risk Response Plan - TEMPLATE

Risk Title:	
Risk Description:	
Risk likelihood rating:	
Risk Consequence rating:	
Overall Risk Rating:	
Risk Likelihood might be worsened by:	
Risk Consequence might be worsened by:	
Actions to be taken and resources put in place to remove or reduce the likelihood of the risk occurring:	
by whom:	
when:	
implementation confirmed by:	
Actions to be taken and resources put in place to lessen the impact of the risk occurring:	
by whom:	
when:	
implementation confirmed by:	
Should the risk occur, the follow steps will be taken: *Note: list steps in chronological order and, in each case, identify the responsible parties by name, include their contact details and confirmation of their awareness of listed responsibilities*	
Should the risk occur the following individuals and organisations will be contacted: *Note: list contacts in order, by name, and means of contact to be used*	
Should the risk occur the following recording and reporting will take place during and after the event:	
Should the risk occur the follow up actions to be taken once any immediate risk has been appropriately addressed are:	
This Risk Response Plan will be Stored in: Updated on: Managed by: Shared with:	
Signed: (inc Name, title, date)	

© Universal Education Centre Pty Ltd 2025

Universal English College

Critical Incident
Policy & Procedure
Version 1.3
August 2025

Version Control

Last Updated:	27/08/2025
Updated By:	Richard Pincus
Approved By:	Dan Wortley
Changes Made:	Remove mention of AISI and UEC Business

© Universal Education Centre Pty Ltd 2025