

Statutory and regulatory compliance

- National Code of Practice for Providers of Education and Training to Overseas Students 2018 Standard 6.8
- English Language Intensive Courses for Overseas Students Standards 2018 (ELICOS Standards 2018)

Related Policies

- Student Support and Welfare Services
- Terms and Conditions
- Students under the Age of 18
- Continuous improvement

Related Documents

- Critical incident register
- Critical incident key facts checklist
- Emergency fire exit plan

Policy

Embassy has a duty of care to protect and provide the highest possible standard of health and safety for its students, staff and visitors. Embassy aims to be in state of preparedness to deal with any critical incident which may arise during normal campus activities through effective planning, management and rehearsal.

This policy has been developed to assist staff and students to prevent or respond promptly, effectively and appropriately to any incident which is likely to cause loss of life, injury, trauma, damage, or disruption. The policy covers basic procedures and reporting systems for preventative measures, immediate and long-term responses, and recovery from a critical incident.

The policy will be amended from time to time particularly after any incident, incorporating evaluation, feedback and lessons learnt. Embassy English will maintain within its critical incident register a written record of any critical incident and remedial action taken, for at least two years after an overseas student ceases to be an accepted student.

This policy complies with the requirements of:

- the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018 (National Code 2018)

- ELICOS Standards 2018
- the Occupational Health and Safety Act 1984 (WA)
- Occupational Health and Safety Regulations 2007

Embassy has appropriate infrastructure and plans in place to ensure the provision of all necessary support services in the event of a critical incident.

Embassy’s critical incident policy ensures:

- an effective approach in responding to critical incidents as they occur
- support and counselling services available to those who are affected by critical incidents
- training and information resources provided to staff in the handling of critical incidents

Procedures

Critical Incident Management Process – early stages

Crises occur frequently. When they involve our students or staff, we need to act quickly to understand the situation, gather information and appoint an individual or team for coordinating our actions in relation to the crises and to determine the next steps.

In the event of a crises or incident, it is important that the matter is investigated, escalated and managed as quickly and as responsibly as possible.

This document sets out an early stage incident management process. It is to be followed in relation to any incident where serious harm, injury or death has occurred or may occur to a student or member of staff, where there is otherwise serious concern for a student or member of staff or where the reputation of Study Group may be materially adversely affected.

It is anticipated and expected that the primary person responsible for coordinating the initial management of an incident will be the local Centre Director, Head of Centre, Regional Director or Manager (referred to in this document as the “Local Lead”).

Incident – First Steps

When a Local Lead becomes aware of an incident they should take the following actions as soon as possible:

- Ensure that all necessary emergency measures are, or have been, attended to as a matter of priority,
- Gather facts on the incident as well as facts on those involved,
- Inform their Regional Director and/or Global Head of Operations (by either texting or calling) to relay the details of 1 and 2 above. This call should happen within 60 minutes of the incident
- Ask their Regional Director and/or Global Head of Operations to convene an initial crisis management meeting (face to face or by conference) consisting of a crisis management team (see below),
- Complete an incident fact sheet (attached as Appendix 1) and circulate it to the crisis management team in advance of the initial meeting (4 above); and

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 CRICOS Provider Code 01682E website: www.embassyenglish.com

- Take such additional steps to escalate the crisis if their line manager cannot be immediately contacted by repeating steps 3 and 4 above to the next senior manager in accordance with the escalation process set out below.

Escalation Process

Incidents are to be escalated within Study Group as soon as possible and in accordance with the following process:

- Local Lead to Regional Director (as per above)
- Regional Director or Global Operations Director is responsible for notifying all members of the crisis team and convening an initial crisis management meeting.
- Managing Director to the Chief Executive Officer, the Chief Financial Officer and the Global HR Director.

The Crisis Team

A pre-agreed crisis team is essential in gathering information, assessing risk, identifying what actions should be taken and ensuring they are completed.

The crisis team consists of:

In all situations:

- Managing Director for the relevant business line:
- Group Counsel:
- HR Director for the relevant business line:
- COO/Director for the relevant business/brand:
- Local Lead (as defined above); and
- Regional Operations Director
- Any other member of staff/third party as the nature of the crisis may dictate. This will include sales and IAC to ensure that messaging to agents is appropriate

Contact details and contingency contact details for the Crisis Management Team

Contact details for all members of the Crisis Management Team will be available at all desk areas at Embassy English. (See next page)

Role	Lead	Contact	Backup	Contact Info
Operations/ Crisis Leader	Mark Freidberg	M: +1-646-660-0408 H: +1-631-423-2793 H: +1-631-271-1588	Joe Shapiro	O: +1-212-497-8321 M: +1-646-284-1452
Managing Director	Robert Morgan	M: +1-609-613-7928	N/A	
HR	Charlotte Gee	O: +61 2 8238 9682 M: +61 466 506 273	Melanie Metcalf	O: +44 (203) 053 0199 M: +44 (7467) 959549
General Council	Gordon Bull	M: +44 7818 514762 H: +44 1273 541769	Liz Crowhurst	Phone +61 2 8263 1804 Mobile +61 466 351 056
RD – ANZ	Sharon Cox	O: +61 3 9935 793 M: +64 434 691 454 H: +61 3 9588 0907 Alt M: +61 407046157	Bradley Muller	O: +61 7 3232 1652 M: +61 401923761 H: +61 7 3511 6202
RD - UK	Victoria Moyle	M: +44 7717 802515 O: +44 1865 320250	Jason White	M: +44 7825 747258 Alt: +44 7968 455752 H: +44 1954 269402
RD – NA	Mark Freidberg	M: +1-646-660-0408 H: +1-631-423-2793 H: +1-631-271-1588	Joe Shapiro	O: +1-212-497-8321 M: +1-646-284-1452
UK Summer	Mike Trewern	O: +44 1273 339358 M: +44 7771 846033 H: +44 1424 719404	John Byrne	O: +44 1273 339375 M: +44 7785 771186
US Summer	John McQuaid	M: 646-629-6963 H: 631-663-3909 Alt M: 516-437-4000	Mark Freidberg	M: +1-646-660-0408 H: +1-631-423-2793 H: +1-631-271-1588
Sales	Lisa James	O: +1 212-497-8387 M: +1 646-581-7261	Nick Stratford	M: +44 7469 852230 W: +44 203 772 7521 Alt M: +44 7530 565424
Marketing/ Comms	Carly Doyle	H: +1 917-474-2533 O: +1 212 497 8339 M: +1-917-359-5902	Nick Stratford	M: +44 7469 852230 W: +44 203 772 7521 Alt M: +44 7530 565424
IAC – NA	Jan Fell	M: +44 7468 691562 H: +44 1273 597147 W: +44 1273 339256	Nick Stratford	M: +44 7469 852230 W: +44 203 772 7521 Alt M: +44 7530 565424
IAC – UK	Jan Fell	M: +44 7468 691562 H: +44 1273 597147 W: +44 1273 339256	Nick Stratford	M: +44 7469 852230 W: +44 203 772 7521 Alt M: +44 7530 565424
IAC – ANZ	Sharon Cox	O: +61 3 9935 793 M: +64 434 691 454 H: +61 3 9588 0907 Alt M: +61 407046157	Cie Thorne	Phone +61 3 9935 7990 Mobile +61 401 765 236

If any of the above is unavailable for any reason, they should be replaced with a suitable alternative.

Depending on the scale and reputational aspects, it may also be appropriate to include representatives from our PR/communications providers or teams, e.g. Topline Communications in the UK. A decision will be taken by the executive team regarding this.

Management of the crisis by the crisis team

This document is not prescriptive as to what a crisis management team should do, as each crisis will be unique. Certain brands may have their own policies and these should be adopted as they apply. It is intended that this Incident Management Sheet will be complimentary to any other existing policies.

Examples of some issues that the crisis team may consider are:

- Appropriate notification of the incident to various stakeholders such as parents, partners (e.g. universities), agents, staff, students, insurers, regulatory/statutory bodies etc and any translation assistance that may be required
- Possible temporary closure of centre
- Provision of counselling/support to students/staff
- Management of communications (and any required public relations support)
- Other business continuity plans
- Responsibility for updating the incident fact sheet and circulating to the crisis team as developments occur
- Frequency and format of future meetings of the crisis team

Reporting of Significant Incidents Involving Students

In an event where a severe critical incident occurs (eg. e.g. student is seriously ill or injured, student is detained or arrested and not granted bail, student is missing), the Centre Director in consultation with the Regional Director will notify the Department of Home Affairs (DHA; www.homeaffairs.gov.au) and provide them with details of the incident via PRISMS. This may also result in the Centre Director initiating contact with the overseas student's next of kin/ family located outside of Australia.

In the case of critical incidents and other material breaches in safety, and recurring incidents of sexual assault or sexual harassment, the Centre Director in consultation with the Regional Director and Head of Compliance will notify TEQSA within 14 calendar days of the event.

Policy Version Details	
Approved by:	Regional Director - Australia and New Zealand, Embassy English
Date:	28 August 2018
Date Commencing	31 August 2018

Document History

Commencing Date	Summary of Changes	Next Review Date
December 2017	v5.0 Review, minor amendment and approval	December 2022
06 April 2018	v5.1 Review and amendment to maintain currency with business and regulatory changes	December 2022
31 August 2018	v5.2 Administrative amendments	December 2022

Appendix 1

Incident – KEY FACTS & CHECKLIST

Date and Time: _____ (Update Number X)

Brief description of the incident:

Local Lead immediately ascertains the following information regarding the student:

Details		Comment
Student Name		
Age		
Location of Student		
Details of any siblings at Study Group		
Course undertaking, including course dates		
Accommodation provision (eg residence, homestay)		
Home country		
Emergency contact details for student		
Whether an agent relationship exists for that student, if so details including contact details		
Whether any other students involved – above info for all of them.		