# **Edith Cowan University**Strategic & Governance Services Centre





**Critical Incident Management Plan** 

Version 1.0

Relevance to ECU Staff

Responsible staff Chief Risk Officer

Responsible area Strategic and Governance Services Centre

Date introduced June 2021

Date(s) modified March 2022

Next scheduled review date June 2024

Policy PL202: Critical Incident and Business Continuity Management

Critical Incident and Business Continuity Management Guidelines

Related University documents
Policy PL201: Integrated Risk Management

Work Health and Safety Incident Reporting and Investigation Guidelines

Related legislation and Standards

AS/NZ ISO 22301:2019: Business continuity management systems

## **Table of Contents**

1.	Purpose	4	
2.	Critical Incident classifications	4	
3.	Critical Incident Management Plan Activation and Escalation		
4.	Specialist support teams	6	
5.	Crisis communications	7	
6.	Additional considerations – TEQSA Material Change Notifications	8	
7.	Additional considerations – if an international student under 18 is involved	8	
8.	Recovery	8	
App	endix A – CIMT Meeting Agenda Guide	9	
App	endix B – Work Health And Safety Considerations	10	
App	endix C – Crisis Communications Matrix	11	
App	endix D – CIMT Core Teams	12	

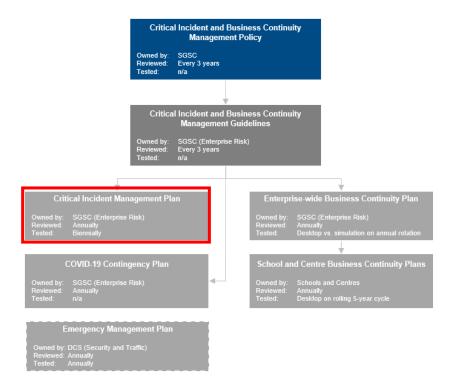
## 1. Purpose

The purpose of the University's Critical Incident and Business Continuity Management ('CIBCM') framework is to provide a coordinated response to dealing with, and continuing business operations during a major or critical incident.

The Critical Incident Management Plan ('CIMP') exists to support the University's Critical Incident Management Team ('CIMT') in providing a consistent approach to responding to a major or critical incident.

Figure 1 below provides an overview of the University's CIBCM document framework:

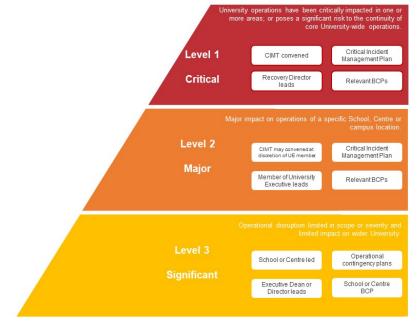
Figure 1: CIBCM framework overview



#### 2. Critical Incident classifications

Incidents at ECU are categorised into one of three levels depending upon the level of support and resources required to manage the outcome. The CIMP will only be activated in a Level 1 Critical incident, or a Level 2 Major incident. These category levels and incident criteria are detailed in the **Criticality Matrix** below:

Figure 2: Criticality matrix

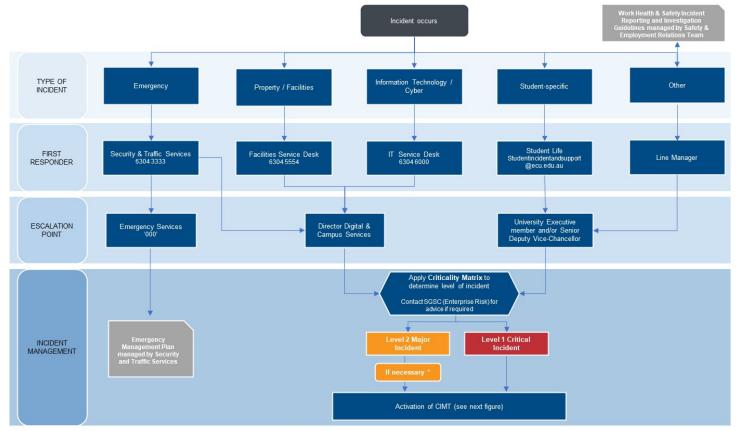


## 3. Critical Incident Management Plan Activation and Escalation

Incidents occurring at ECU will vary and any impact will depend upon the geographical location, the potential to cause harm to people and the environment, and any economic or reputational impact upon the University.

The critical incident management process is illustrated in Figure 3 below:

Figure 3: Critical Incident management process



\* At discretion of a member of University Executive

The **Critical Incident Management Team** ('CIMT') is an incident specific team which is formed at the time a major or critical incident occurs and lasts until no longer required. As an executive group, the CIMT does not attend the incident scene, but will appoint a Site Liaison to attend the scene if required.

The membership of the CIMT is set out in the <u>Critical Incident and Business Continuity Management Guidelines</u>. <u>Appendix D</u> provides an overview of the membership of the CIMT which may vary depending on the nature of the incident being managed.

Note that the CIMT meets virtually via Microsoft Teams. Please refer to the Emergency Management Plan for the control room procedures in the event of an emergency.

The process to activate and coordinate the CIMT is illustrated in Figure 4 below:

Figure 4: Critical Incident Management Team process

Critical Incident Management Team								
Activation	Additional considerations	Meeting actions	Recovery					
CIMT activated by SDVC or member of University Executive as per Figure 3 and notifies CIMT Coordinator	The Safety & Employment Relations Team (SER) must be included if:  The incident includes Health &	Standard agenda template (Appendix A) is used to guide meeting	Refer to the Critical Incident and Business Continuity Management					
CIMT Coordinator liaises with Recovery Director to confirm a suitable meeting time	Safety consequences (potential or actual)  If the incident is notifiable as per notifiable items list in Appendix B	Recovery Director provides summary of the incident and information available to date	Guidelines and the Enterprise-Wide BCP for information on recovery					
CIMT Coordinator notifies CIMT members of intention to meet via MS Teams and sends meeting invite to confirm time	Assign a Site Liaison (e.g. a staff member attending the incident site), if required	Specialist areas and Site Liaison contribute specific issues and further available information						
Recovery Director/CIMT Coordinator contacts Corporate Relations Team to provide a briefing on incident as per Section 5	Determine if the Communications sub- group requires enacting as per Section 5	CIMT Communications Coordinator considers communication needs and verbally recommends communication and media strategy						
	Determine any other necessary attendees as per Section 4	CIMT considers resolution of issues and incident response actions across staff, student and governance/legal matters						
		CIMT appoints someone to report the incident in the Riskware in accordance with the Incident Reporting and Investigation Guidelines as per Section 4						

#### 4. Specialist support teams

Other areas within the University may also be called upon to provide advice and guidance, dependant of the type of incident. These areas include:

- Work Health and Safety. The Safety & Employment Relations (SER) team must be included in the Critical Incident Management Team if the critical incident:
  - $\circ$  Applies to any item listed in Appendix B; or
  - o There are actual or potential Health and Safety consequences.

For assistance with reporting an incident in Riskware, see the <u>Incident Reporting and Investigation</u> <u>Guidelines</u>, or contact the SER team.

- Legal and Integrity (where legal and/or compliance advice is required)
- International Office (for overseas locations and/or incidents on study tours, etc.)
- <u>Finance and Business Services Centre</u>;
- Library Services Centre
- ECU Communications Centre; and/or
- Schools

If an incident occurs at the Mount Lawley or South West campus, the CIMT will appoint a liaison to coordinate any support requirements. These liaisons would be:

- Mount Lawley Campus
  - o A member of the Senior Leadership Team based at the Mount Lawley campus; or
  - o The DCS representative in Campus Support Office.
- South West (Bunbury) Campus
  - o The Dean of the South West campus; or
  - o The DCS representative in Campus Support Office.

#### 5. Crisis communications

Timely, accurate and targeted delivery of communications during a disruption is key to ensuring an incident is managed and controlled appropriately.

For Critical Incidents (L1), it may be necessary for a Crisis Communications subgroup of the CIMT to be convened remotely after the CIMT, to discuss communication requirements in further detail. Please see the <u>Critical Incident and Business Continuity Management Guidelines</u> for further details on what the crisis communications subgroup is responsible for, and who it comprises of.

#### 5.1 Initial contact

Once the CIMT is convened, the Recovery Director is to contact the Corporate Relations team to provide an overall briefing on incident. Corporate Relations can be contacted on the after-hours mobile (0402 016 344).

If there is no response within an hour, escalate to the Director of Brand and Marketing (0408 927 321).

During critical incidents, the Corporate Relations Team will operate in shifts covering 7.30am-6.30pm 7 days a week as required.

#### 5.2 Escalation to subgroup

The escalation to forming a Crisis Communications subgroup is to be determined in consultation with Recovery Director and the Corporate Relations Team.

A critical incident will usually require a Crisis Communications subgroup if the following is required:

- There is a need for key messaging via staff or student via global email;
- Mass communications are required;
- Media needs to be engaged/have contacted ECU; or
- Pro-active messaging is required to protect ECU's brand or reputation.

#### 5.3 Crisis communication protocols

The Crisis Communications subgroup will provide feedback on style and content of official university communications, typically comprising key messages, staff communications and media statements.

Final approval is provided by the Recovery Director or Senior Deputy Vice-Chancellor.

For speed of response and distribution in a fast-moving crisis, the majority of communications, particularly when operational or ongoing, are attributed to the Senior Deputy Vice-Chancellor/Recovery Director.

Other ECU teams (Student Life, DCS, Alumni Relations, etc.) are encouraged to distribute approved official university communications on their channels.

The Vice-Chancellor is to be attributed at the beginning or resolution of crisis or for emphatic messaging.

#### 5.4 Crisis communication channels

The approved crisis communication channels are:

- Mobile phone: for initial alert and escalation of critical incidents
- Email: for approval trails of documents
- SharePoint: for document sharing, editing and version control
- MS Teams: for sharing of time sensitive but non-critical information during crisis, and for out of hours crisis communications

Refer Appendix C for the approved Communications Matrix.

#### 5.5 Out of hours communications process

If a critical incident occurs out of business hours, the Recovery Director or relevant Executive is to advise the out-of-hour crisis communications group via MS Teams and organise a Teams call within thirty minutes.

## 6. Additional considerations – TEQSA Material Change Notifications

Under the *Tertiary Education Quality and Standards Agency Act 2011*, registered higher education providers must notify TEQSA of an event that will significantly affect the providers ability to meet the Threshold Standards. The notification must be given no later than 14 days after the day the provider would reasonably be expected to have become aware of the event.

The *TEQSA Material Change Notification Policy* requires notification of changes that may impact students, including:

- · Critical incidents and other material breaches in safety; and
- Recurring incidents of sexual assault or sexual harassment.

TEQSA defines critical incidents as a traumatic event, or the threat of such (within or outside of Australia), which causes extreme stress, fear or injury.

The CIMT will determine if the critical incident is a notifiable event. If deemed notifiable, the CIMT Recovery Director will submit the notice via <a href="mailto:materialchanges@teqsa.gov.au">materialchanges@teqsa.gov.au</a> and the CIMT Support Coordinator will retain the records.

Further information on the policy and its requirements can be found here.

#### 7. Additional considerations – if an international student under 18 is involved

Under the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*, registered training providers are required to provide certain support in a critical incident.

The National Code is a legislative instrument made under the Education Services for Overseas Students Act 2000 and sets nationally consistent standards to support providers to deliver quality education and training to overseas students.

The National Code defines a critical incident as 'a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury'. The critical incident policy must be activated in these situations. This does not include serious academic misconduct.

In all instances where a Critical Incident involving an under 18-year old International student has occurred the University will, depending on the circumstances, inform and consult with the following individuals and agencies:

- Parent or legal guardian
- Department of Home Affairs
- WA Police
- Department of Communities (WA)
- ECU Counselling services

As per the Code, ECU will maintain a written record of any critical incident and remedial action taken by the University for at least two years after the overseas student ceases to be an accepted student under the ESOS Act.

Further information on the Code and its requirements can be found here.

## 8. Recovery

The Enterprise-Wide Business Continuity Plan (BCP) will be enacted to guide recovery efforts. The Enterprise-Wide BCP includes recovery protocols for a range of scenarios for the core functions of the University.

Please refer to the Critical Incident and Business Continuity Management Guidelines and the Enterprise-Wide BCP for further information on recovery.

#### APPENDIX A - CIMT MEETING AGENDA GUIDE

#### Agenda for 1st CIMT meeting

Objective: prioritise actions and confirm response team

- 1. Summary of incident (meeting convener)
- 2. Appointment of Recovery Director & Site Liaison (if applicable) for incident
- 3. Establish safety and security of students, staff, contractors involved in incident (Recovery Director)
- 4. Advice on initial media / communications strategy and approach (Corporate Communications)
- 5. Incident response actions (Recovery Director)
- 6. Summary of actions
- 7. Confirmation of next meeting and attendees

#### Agenda for subsequent CIMT meetings

Objective: confirm incident response is on track towards recovery

- 1. New information from Site Liaison and Recovery Director
- 2. Status of actions from 1st meeting
- 3. Further communications/media actions
- 4. Summary of actions
- 5. Confirmation of next meeting and attendees

#### Agenda for crisis communications group (out of hours incident)

Objective: confirm communications approach

- 1. General required actions (i.e., staff or student global or targeted communications to a specific cohort)
- 2. Determine level of urgency of communications
- 3. Delegation of content creation (i.e., email)
- 4. Set timeframe for actions to be completed
- 5. Notification to relevant areas

#### APPENDIX B - WORK HEALTH AND SAFETY CONSIDERATIONS

As per the Work Health and Safety Act 2020, there are certain incidents that are notifiable to the regulator (namely Worksafe WA). The Safety & Employment Relations (SER) team are responsible for the notification to the regulator. Therefore, if an incident includes any of the below, the SER team must be included in the CIMT.

#### Requirement

notifiable incident means - the death of a person; or

#### a serious injury or illness of a person:

- a) that requires the person to have immediate treatment as an in-patient in a hospital: or
- b) that requires the person to have immediate treatment for
  - i. the amputation of any part of the person's body; or
  - ii. a serious head injury; or
  - iii. a serious eye injury; or
  - iv. a serious burn: or
  - v. the separation of the person's skin from an underlying tissue (such as degloving or scalping); or
  - vi. a spinal injury; or
  - vii. the loss of a bodily function; or
  - viii. serious lacerations; or
- c) that requires the person to have treatment by a medical practitioner within 48 hours of exposure to a substance; or
- d) that occurs in a remote location and requires the person to be transferred urgently to a medical facility for treatment; or
- e) that, in the opinion of a medical practitioner, is likely to prevent the person from being able to do the person's normal work for at least 10 days after the day on which the injury or illness occurs, and includes any other injury or illness prescribed by the regulations but does not include an illness or injury of a prescribed kind.

## a dangerous incident:

means an incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person's health or safety emanating from an immediate or imminent exposure to —

- a) an uncontrolled escape, spillage or leakage of a substance; or
- b) an uncontrolled implosion, explosion or fire; or
- c) an uncontrolled escape of gas or steam; or
- d) an uncontrolled escape of a pressurised substance; or
- e) electric shock; or
- f) the fall or release from a height of any plant, substance or thing; or
- g) the collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations; or
- h) the collapse or partial collapse of a structure; or
- i) the collapse or failure of an excavation or of any shoring supporting an excavation; or
- j) the inrush of water, mud or gas in workings, in an underground excavation or tunnel; or
- k) the interruption of the main system of ventilation in an underground excavation or tunnel.

# **APPENDIX C – CRISIS COMMUNICATIONS MATRIX**

Audience	Deliverable	Channels	Frequency	Who?
Staff	Informational updates from Recovery Director Overarching / inspiring message from VC at beginning, end of crisis	Global email Staff portal FAQs	Initial, then daily/as needed	Corporate Relations
Staff – researchers	Research-specific contingencies, information	Email FAQs MS Teams	Immediate, then as needed	DVC (Research)
Staff – T&L	Teaching-specific contingencies, information	Email FAQs MS Teams	Immediate, then as needed	DVC (Education)
Staff – Commercial services	Informational updates	Email FAQs MS Teams	Immediate, then as needed	Director Digital and Campus Services
Students – all	Informational updates from DVC(E) / Director Student Life Overarching message from VC at beginning, end of crisis	Global email SMS Social Student Portal FAQs	Immediate, then as needed	Corporate Relations Student Life Brand and Marketing
Students – HDR	Research-specific contingencies, information	Email FAQs	Immediate, then as needed	Graduate Research Services
Students – International	For issues affecting international borders, visas, enrolments etc.	Email FAQs	As needed	Student Life/ International Office
Students – Future	Providing holding lines/FAQs to address enquiries	FAQs	Initial, then as needed	Corporate Relations
Chancellor / Council	Updates on staff, student communications and issues management	Email	As needed	Strategic & Governance Services
Media	Holding statement Media release	Email	As needed	Corporate Relations
Alumni	Rescheduled events	Email Social	As needed	Development and Alumni Relations

#### APPENDIX D - CIMT CORE TEAMS

As per the <u>Critical Incident and Business Continuity Management Guidelines</u>, the Critical Incident Management Team (CIMT) is comprised of the following:

- Recovery Director (Senior Deputy Vice-Chancellor or a relevant Deputy Vice-Chancellor)
- Human Resources Coordinator (Director Human Resources Services Centre, or alternate, Manager Safety & Employment Relations)
- Student Support Coordinator (Director Student Life, or alternate, Manager Student Incident & Support)
- Physical Resources Coordinator (Director Digital and Campus Services, or alternate, Manager Campus Operations & Support)
- Information Technology Coordinator (Chief Information Officer or alternate, Manager Information Security, Governance & Operations)
- Communications Coordinator (Manager Corporate Communications or alternate, Senior Communications Adviser)
- Governance and Compliance Coordinator (Director Strategic and Governance Services or alternate, Manager Legal and Integrity)
- CIMT Support Coordinator (Chief Risk Officer or alternate, Senior Risk Adviser)

Depending on the type of incident, the CIMT may not require all participants, or may require additional participants. The table below sets out the suggested CIMT for each incident type:

Property / Facilities	Information Technology / Cyber		
<ul> <li>Senior Deputy Vice-Chancellor</li> <li>Director, Digital and Campus Services</li> <li>Manager, Campus Operations &amp; Support</li> <li>Manager, Buildings and Planning</li> <li>Manager, Corporate Communications</li> <li>Chief Risk Officer</li> </ul>	<ul> <li>Senior Deputy Vice-Chancellor</li> <li>Director, Digital and Campus Services / CIO</li> <li>Manager, Information Security &amp; Governance</li> <li>Manager, Customer Services</li> <li>Director, Strategic &amp; Governance Services</li> <li>Manager, Corporate Communications</li> <li>Chief Risk Officer</li> </ul>		
Student-specific	Other (e.g. staff)		
<ul> <li>Senior Deputy Vice-Chancellor (if required)</li> <li>Deputy Vice-Chancellor (Education)</li> <li>Executive Dean of affected School</li> <li>Director, Student Life</li> <li>Manager, Student Incidents &amp; Support</li> <li>Director, Strategic &amp; Governance Services</li> <li>Manager, Corporate Communications</li> <li>Chief Risk Officer</li> </ul>	<ul> <li>Senior Deputy Vice-Chancellor</li> <li>Executive Dean / Director of affected School / Centre</li> <li>Director, Human Resources</li> <li>Manager, Safety &amp; Employment Relations</li> <li>Director, Strategic &amp; Governance Services</li> <li>Manager, Corporate Communications</li> <li>Chief Risk Officer</li> </ul>		