Critical Incident and Business Continuity Policy

Policy Owner:	College Director / Principal
Keywords:	Critical Incident, Business Continuity, Disruption, Recovery
Policy Code:	QHRPO003

1. INTENT

1.1 This Policy provides a framework for Edith Cowan College's ('ECC' or the 'College') response to a Critical Incident in the period immediately following the Critical Incident and for the management of longer-term consequences arising from a Critical Incident. This Policy and the *Critical Incident Procedures* define the roles and responsibilities of key Staff in:

a) the management, coordination and communication of information regarding a Critical Incident; and

b) the recovery and post-incident review of a Critical Incident and its management.

2. ORGANISATIONAL SCOPE

2.1 This Policy applies to the following:

a) all campuses of the College;

b) all Staff, Students and Visitors; and

c) all activities that are under the control or direction of ECC, whether conducted on or off ECC-controlled premises, including business-related travel interstate or overseas.

2.2 This Policy is supported by the *Critical Incident and Business Continuity Procedures.*

2.3 ECC's Emergency procedures are outlined in the *Wellness, Health and Safety Procedures.*

2.4 ECC's protocols for managing Sexual Assault and/or Sexual Harassment are outlined in the *Sexual Assault and Sexual Harassment Prevention and Response Policy* and the *Sexual Assault and Sexual Harassment Response Procedures.*

3. DEFINITIONS

3.1 The *Glossary of Policy Terms* applies to this Policy.

4. POLICY CONTENT

4.1 A Critical Incident is any sudden or progressive event which requires immediate attention and coordinated, decisive action by ECC Senior Management to prevent or minimise any negative impact on the health and welfare of one or more individuals or the College. A Critical Incident event poses a significant risk to the continuity of core College-wide operations. This level of Incident may also have implications at the local, state or national level.

4.2 Some examples of Critical Incidents include:

Death / suicide	Flooding
Serious accident or injury	Power outage
Deprivation of liberty, threats of violence, assault, rape / sexual assault, aggravated burglary, biological or chemical weapons	Water supply failure
	Transport disruption
	Severe weather
	Pandemic
Fire, bomb, explosion, gas/chemical hazards, discharge of firearms	Terrorism
	Exclusion from buildings (e.g. crime scenes, terrorism)
Threat of widespread infection or contamination	Denial of service attacks
Civil unrest	Unexpected network outage
Severe Occupational Safety and Health risk	Ransomware infection
	Vermin infestation
Serious damage to essential facilities	Adverse social media storm
Disruption to operations of ECC	Significant data breach and loss of personal data
Information which has the potential to negatively affect the reputation of ECC, Navitas or ECU in the media / wider community	Damage to buildings
	Loss of a major supplier
Building fire	Illness affecting significant numbers of staff members

4.3 The purpose of this Policy and its associated *Critical Incident and Business Continuity Procedures* is to ensure ECC can keep operating during a disruption, whilst continuing to look after its people, assets, and reputation.

4.4 ECC's priorities during any Incident are to:

a) preserve life and avoid injury;

b) minimise impact on Students;

c) preserve ECC's brand, reputation, operations and assets;

d) return to business as usual as soon as practical; and

e) minimise impact on the local community and environment.

Critical Incident and Business Continuity Framework

4.5 Critical Incidents occurring at ECC 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 College.

4.6 Business Continuity management is the system to prepare for, provide and maintain

controls and capabilities for managing the College's overall ability to continue to operate during a Critical Incident.

4.7 ECC's Critical Incident and Business Continuity Framework is the suite of Policies and Procedures ECC has in place to ensure it prepares for Critical Incidents and business disruption, responds appropriately and learns from them, as outlined in Figure 1 below:

Figure 1. Critical Incident and Business Continuity Framework

Mitigation	Response
Wellness, Health and Safety Policy	Critical Incident and Business Continuity Procedures
Sexual Assault and Sexual Harassment Prevention and Response Policy	Wellness, Health and Safety Policy and Procedures
Critical Incident and Business Continuity Policy	Sexual Assault and Sexual Harassment Prevention and Response Procedures
Fitness to Study Policy	COVID Response Protocol - Students
Business Continuity Plan	COVID Response Protocol - Staff
Risk Management Plan	Fitness to Study Procedures
Academic Risk Management Plan	
COVID Safe Plan	

4.8 The overarching, cyclical approach ECC takes to Critical Incidents and Business Continuity risk is proactive and preventative (see Figure 2), and includes the following stages:

a) **Identify and Assess** – identifying, assessing, controlling, treating and monitoring risk of disruption;

b) **Plan and Prepare** – developing, documenting, and testing response arrangements and training Staff with response duties;

c) **Respond** – making people safe, minimising damage to assets, and managing strategic issues and consequences;

d) **Recover** – implementing business continuity arrangements and repairing negative impacts; and

e) **Learn and adapt** – reviewing and improving arrangements.

Identify and Assess

4.9 As part of the regular risk review process, ECC Senior Management identifies and

assess business disruption-related risks that could impact on operations.

4.10   In this planning, the business disruption-related risks are considered as 'loss of' statements, for example:

a)   loss of workforce (human disease, weather event, industrial action, transport disruption);

b)   loss of supply chain / logistics;

c)   loss of building / accommodation, or access to building/accommodation (fire/earthquake/ flooding/weather event);

d)   loss of essential services (gas / power / water / waste disposal); and

e)   loss of access to systems, network.

Figure 2. Critical Incident and Business Continuity Cycle

4.11   As part of the regular risk review process, ECC Senior Management identifies and assess business disruption-related risks that could impact on operations.

4.12   In this planning, the business disruption-related risks are considered as 'loss of' statements, for example:

f)   loss of workforce (human disease, weather event, industrial action, transport disruption);

g)   loss of supply chain / logistics;

h)   loss of building / accommodation, or access to building/accommodation (fire/earthquake/ flooding/weather event);

i)   loss of essential services (gas / power / water / waste disposal); and

j)   loss of access to systems, network.

4.13   Following identification of the potential disruption-related risks that could affect

ECC's operations, the likelihood and impact of the risk is assessed in accordance with ECC's Risk Management Framework.

4.14   The purpose of ECC's processes and controls is to:

a)   reduce the likelihood of the Incident occurring, and if possible, prevent the Incident from occurring;

b)   reduce the impact of the Incident should it occur; and

c)   reduce the duration of the Incident should it occur.

Four Aspects of Critical Incident Response

4.15   Should a Critical Incident occur, there are four aspects to ECC's response (See Figure 3):

a)   Emergency Management;

b)   Incident or Crisis Management;

c)   Business Continuity Management; and

d)   Business Recovery.

These responses are all designed to reduce the impact of an Incident and restore operations to normal as soon as possible as part of an overall risk management approach.

Figure 3. Four Aspects of Critical Incident Response
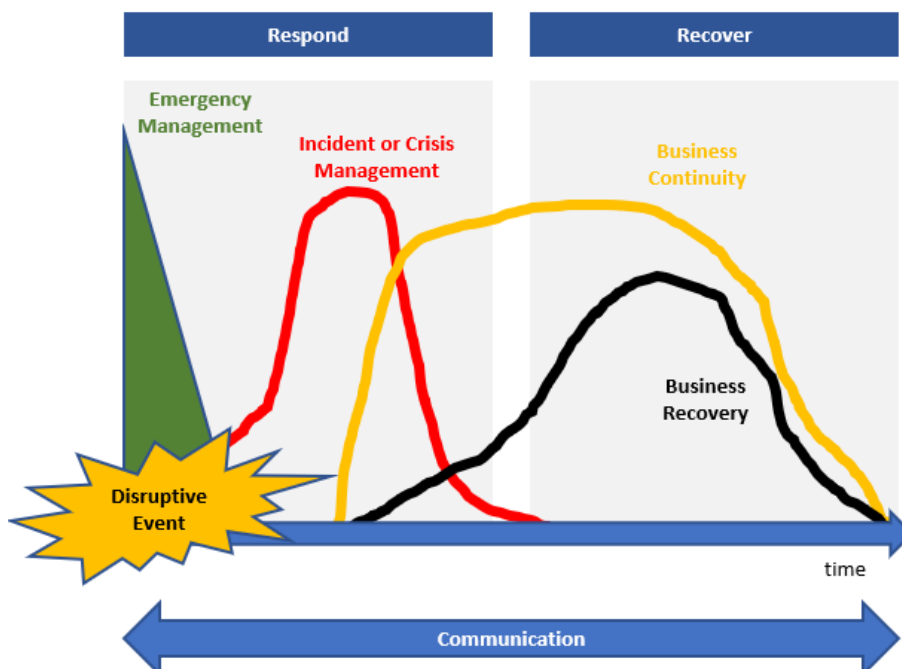
4.16   Depending on the nature of the Incident, all four response processes will be used or just one or two. The responses may happen consecutively or concurrently, and there is likely to be significant overlap in terms of the people involved, and the communications channels used.

Emergency Management

4.17   Emergency Management refers to the immediate actions ECC needs to take when an incident occurs that impacts the normal operations and requires a different and immediate response, usually involving external Emergency services.

4.18   The Emergency Management response is primarily concerned with the preservation and protection of life and property in the immediate period following an Incident. ECC's Emergency Management is outlined in the *Wellness, Health and Safety Procedures*.

Incident Management

4.19   The Incident Management response is concerned with containing the Incident and returning to normal operations as quickly as possible. The exact response will depend on the type of Incident.

4.20   ECC defines Incidents as 'Critical', 'Major' and 'Significant' and escalates its response accordingly.

4.21   The level of Incident is used to determine the appropriate response and the team to be activated.

4.22   An Incident is classified as 'Major' if ECC is still able to function; compared to a Critical Incident, a Major Incident is more limited in scope, e.g. only one campus or one part of the business is affected. It is addressed under the term 'Critical Incident' in this Policy, unless specifically noted.

4.23   The College Director and Principal:

   a)   has authority to deem an Incident as being a Critical Incident;

   b)   manages Critical Incidents at ECC; and

   c)   leads the Critical Incident Management Team (CIMT).

4.24   Once an incident has been deemed to be a Critical Incident, a CIMT must be convened.

4.25   Major incidents may require CIMT oversight as determined by the College Director and Principal.

4.26   All Critical Incidents, including Major Incidents where relevant, are required to be the subject of a Post-Incident Review, to be completed in accordance with the *Critical Incident and Business Continuity Procedures.*

Business Continuity

4.27   The Business Continuity phase is concerned with ECC being able to continue to deliver services at acceptable predefined levels following a disruptive incident.

4.28   Business Continuity will involve making whatever temporary arrangements are necessary for ECC to continue with its essential functions during the disruption.

4.29   ECC maintains a *Business Continuity Plan* (BCP) that is:

   a)   aligned with ECC's Integrated Risk Management framework;

   b)   reported to the Board of Directors; and

c) accessible to Staff in the event of an Incident.

Business Recovery

4.30 The Business Recovery phase is concerned with ensuring critical business operations can continue during an Incident and restoring operations after the interruption is over.

4.31 Business Recovery is the process of restoring the full functionality of the processes, services and/or facilities affected by the incident.

4.32 The recovery effort ends when the College Director and Principal is satisfied that a coordinated response is no longer required.

4.33 Recovery may be able to start as soon as it is safe and practical to do so, and therefore the recovery may run in parallel with the response.

Post-Incident Review, Reporting and Debrief

4.34 A Post-Incident Review and Debrief will be conducted by the CIMT within a reasonable timeframe following the end of a Major or Critical Incident, with findings reported to the Board of Directors, Navitas and ECU.

Response Plan Training and Review

4.35 Plans will be evaluated on a regular basis, results documented and improvements implemented.

4.36 All Staff members will be provided with an overall awareness of ECC's Critical Incident and Business Continuity framework. Those with Incident management responsibilities will receive appropriate training, so they are aware of what is required of them.

TEQSA Material Change Notifications

4.37 As required under the *Tertiary Education Quality and Standards Agency Act 2011*, ECC will notify TEQSA if an event occurs that will significantly affect its ability to meet the *Threshold Standards*.

Underage Students (Minors)

4.38 As required under the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*, ECC will provide additional support when an Underage Student (Minor) is involved in a Critical Incident.

4.39 As per the *National Code* and the *ESOS Act 2000*, ECC will maintain a written record of any Critical Incident and remedial action taken by the College for at least two years after the overseas Student ceases to be an accepted Student.

5. **ACCOUNTABILITIES AND RESPONSIBILITIES**

5.1 The **College Director and Principal** is responsible for:

a) providing support in the strategic direction of recovery, including resources and infrastructure, during a Critical Incident;

b) the development, communication and ongoing maintenance of Business

Continuity Plans; and

e) ensuring ECC Staff are trained to respond to Critical Incidents in accordance with this Policy and the *Critical Incident and Business Continuity Procedures.*

5.2 The **ECC OSH Representative** is responsible for Mandatory Reporting and Site Liaison.

5.3 The **Student Counsellor** is responsible for supporting Students during and following a Critical Incident.

5.4 The **Critical Incident Management Team (CIMT)** has responsibility to provide leadership and control of a Critical Incident.

5.5 Every **Student and Staff** is responsible for actively taking part in awareness and training sessions as required and to follow directions provided in the event of a Critical Incident occurring.

6. RELATED DOCUMENTS

6.1 This Policy is supported by the *Critical Incident and Business Continuity Procedures.*

6.2 Other ECC documents relevant to the operation of this Policy include:

> *Sexual Assault and Sexual Harassment Prevention and Response Policy*
> *Wellness, Health and Safety Policy*

6.3 Documents related to this Policy include:

> *Work Health and Safety Act 2020*
> *AS/NZS ISO 9001: Quality management systems*
> *ISO 45001: Occupational Health and Safety management systems –*
> *Requirements with guidance for use*
> *AS/NZS ISO 31000: Risk Management: Principles and Guidelines*

7. CONTACT INFORMATION:

For queries relating to this document please contact:

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8. APPROVAL HISTORY:

POLICY APPROVED BY:	Senior Management Group
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DATE LAST MODIFIED:	December 2019
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NEXT REVISION DUE:	February 2024