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#### Version Control

<b>Issue Date:</b>	<b>Summary of Changes</b>	<b>Review Date</b>
24/06/2019	New supplement for <i>HR 3.20 D1 Critical Incident Management Plan</i> , expressly incorporating requirements of National Code Standards 5.3.4, 5.3.6 and 5.5	24/06/2021

# Policy and Procedure: Critical Incident Management and Disruption to Welfare Arrangements involving Students Under-18

## Overview

The purpose of this policy is to ensure that Navitas English meets Registered Provider obligations under the ESOS framework in relation to critical incident management procedures and disruption to welfare arrangements involving students Under-18

The *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code) includes the following requirement as a component of Standard 5: Younger overseas students:

- 5.3 Where the registered provider takes on responsibility under the Migration Regulations for approving the accommodation, support and general welfare arrangements (but not including guardianship, which is a legal relationship not able to be created or entered into by a registered provider) for a student who is under 18 years of age, the registered provider must:
- 5.3.4 include as part of their policy and processes for critical incidents under Standard 6 (Overseas student support services), a process for managing emergency situations and when welfare arrangements are disrupted for students under 18 years of age

Source: <https://www.legislation.gov.au/Details/F2017L01182>

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## Scope

This policy applies to any critical incidents and disruptions to welfare arrangements involving Navitas English students who are under 18. It is to be read in conjunction with the policy and procedure contained in *HR 3.20 D1 Critical Incident Management Plan* and those Policies listed below under *Related Policies*.

## Policy Statement

Navitas English policy and procedure in relation to critical incidents and disruptions to welfare arrangements ensures the interests of under-18 students are managed effectively and appropriately, including that Navitas English is prepared for critical incidents and disruptions to welfare affecting students under-18.

Policy and procedures outline the action to be taken in the event of a critical incident or disruption to welfare arrangements involving students under 18.

## Critical Incident Management

Critical incidents which may involve under-18s include but are not limited to:

- Missing students
- Serious accident or injury, including self-harm or threats of self-harm
- Physical, sexual or other assault or abuse, or threats of these
- Death, suicide or threats of suicide
- Drug or alcohol abuse
- Mental health episode
- Accidents causing injury or trauma
- Medical incidents requiring hospitalisation
- Criminal acts affecting or involving the student
- Other incidents which cause the student physical or psychological harm

### **Risk assessment**

Navitas English will include express consideration of significant risks to under 18s within the risk assessment and mitigation procedures detailed in *HR 3.20 D1 Critical Incident Management Plan* and associated policies under sections 5, 8 and 12.

### **Notification**

Students and other parties including staff, carers, and homestay families who become aware of a possible or actual critical incident affecting an under-18 student are required to report the incident as soon as practicable:

- a. where there is an emergency by dialling 000 (triple zero)
- b. to the *Centre Manager and Director of Studies* or *Student Services Manager* at the school which the student is attending, in person, via email or telephone; or
- c. to another Navitas English staff member; or
- d. out of hours, to the 24 hour support service accessed via 1 800 NAVITAS (1 800 628482)

These contact details are made available to students during orientation, in student handbooks, and on classroom displays and other centre notice boards.

### **Critical Incident Management**

Navitas English will manage the response to a notification of a critical incident involving an under-18 student in alignment with the policy and procedure described in *HR 3.20 D1 Critical Incident Management Plan* under sections 9, 10, 11 and 12.

In all circumstances Navitas English will make every reasonable effort to contact the under-18 student. If Navitas English is unable to contact a student under 18 and has concerns for the student's welfare Navitas English will notify the police and other relevant Commonwealth, state and territory authorities, and the student's Consulate or Embassy, including as required by law, as soon as practicable.

Wherever appropriate, Navitas English will facilitate the referral of the student to external agencies or other service providers best able to support the student, to complement the provision of support services by Navitas English.

### **Reporting**

Navitas English will manage reporting of a critical incident involving an under-18 student in alignment with the policy and procedure described in *HR 3.20 D1 Critical Incident Management Plan* under section 8.

Where appropriate, Navitas English will ensure that appropriate contact is made with the student's next of kin, carer and/or other nominated contact, and/or Consulate or Embassy.

Where external reporting is required by law, Navitas English will notify the police or other relevant Commonwealth, state or territory authorities as soon as practicable.

Navitas English will review the critical incident and critical incident management response in alignment with sections 11 and 12 of *HR 3.20 D1 Critical Incident Management Plan*

## **Disruption to Welfare Arrangements**

In the event of a critical incident or any other circumstances that disrupt (or have the potential to disrupt) the welfare arrangements of an under-18 student, Navitas English will:

- a. review the continuing appropriateness of the student's accommodation, carer, support and other welfare arrangements in light of the critical incident or other change in circumstances
- b. contact the carer, homestay family, accommodation provider and any other service providers relevant to the critical incident or other change in circumstances, updating them as appropriate
- c. as required, arrange emergency short-term accommodation and/or alternative support and welfare arrangements as an immediate priority, including arranging transport to the new accommodation
- d. contact the student's parents, next of kin or legal guardian(s) as soon as practicable, including the use of interpreters where required

Navitas English will update the student's care, accommodation and welfare details in PRISMS as soon as practicable, and in any event within 24 hours if Navitas English is no longer able to approve the student's welfare arrangements.

## Related Policies

HR 3.20 D1 Critical Incident Management Plan

NES 3.01 Policy and Procedure Homestay Recruitment, Maintenance and Arrangement

NES 3.04 Policy and Procedure Carer Recruitment, Maintenance and Arrangement

NES 8.02 Policy and Procedure Under 18 Students Welfare and Accommodation Arrangement

NES 8.03 Policy and Procedure Under 18 Pathway Students

NES 3.15 Policy and Procedure Younger Overseas Students

## Responsibilities

<b>Executive General Manager</b>	Is responsible for the approval of this policy
<b>Director of Student Services and Experience</b>	Is responsible for the implementation, distribution and review of this policy.
<b>Centre Managers &amp; Directors of Studies; Student Services Managers</b>	Are responsible for the day-to-day implementation of this policy and are the first points of contact within each centre for any questions in relation to this policy.
<b>Other Navitas English staff</b>	Are responsible for assisting with the implementation of this policy and in ensuring actions are in accordance with it.
<b>Navitas English Carers, Homestay Families and other service providers</b>	Are responsible for responding to critical incidents and/or disruptions to welfare arrangements in alignment with this policy.