



## Critical Incident Policy for International Students

### 1. Introduction

Brisbane Boys' College has obligations under the *Education Services for Overseas Students (ESOS) Act 2000*, which regulates the delivery of education and training courses to students who come to Australia to study on a student visa. One of the aims of the ESOS Act and its related legislation is to protect the interests of international students as well as protect and enhance Australia's reputation for quality education, provide tuition protection and support the integrity of the student visa program.

### 2. Purpose

This policy ensures that any critical incident that occurs involving a student enrolled at Brisbane Boys' College on a Student visa (subclass 500), is documented and reported and that appropriate action is taken by Brisbane Boys' College as required under the Education Services for Overseas Students Act 2000 (ESOS Act.) This policy supports international students and Brisbane Boys' College employees in their response to a critical incident.

The purpose of the policy is to ensure that Brisbane Boys' College meets its obligations in relation to its duty of care as a registered provider of educational services to overseas students.

### 3. Scope

For the purpose of this policy an International Student refers to a student currently enrolled at Brisbane Boys' College on a Student visa (subclass 500), including a student residing in Brisbane with a parent or relative approved by the Department of Home Affairs (Immigration) or a student for whom Brisbane Boys' College has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW) that is, the student is residing in the Brisbane Boys' College Boarding House. Brisbane Boys' College does not provide Homestay arrangements for International Students.

This policy applies to all International Students enrolled at Brisbane Boys' College and employees of the College.

### 4. What is a Critical Incident?

A critical incident is defined in the National Code as "any traumatic event or threat of such (within or outside Australia) which has the potential to harm life or well-being, and causes extreme stress, fear or injury to the person experiencing or witnessing the event."

A critical incident may occur during school hours – on or off campus, outside of school hours, off school grounds – during or after school hours or on weekends or in school holidays.

Critical incidents are not limited to, but could include the following circumstances

- Serious injury, illness or death
- Where a student is missing
- Where a student experiences or is threatened with violence, physical, sexual or other abuse
- Threat or act of violence towards a member/s of the school community
- Student or staff witnessing a serious accident or incident of violence
- Development of a Pandemic in the school community
- Natural disaster
- Other non- life threatening events that have an impact on a student
- Other serious events

## 5. References

- Child Protection Act 1999
- Education Services for Overseas Students Act 2000
- Education Services for Overseas Students Regulations 2019
- Migration Act 1958
- Migration Regulations 2004
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- National Principals for Child Safe Organisations
- Social Media (Student Usage) Policy
- Work Health and Safety Act 2011
- Working with Children (Risk Management and Screening) Act 2000

## 6. Policy Statement

Brisbane Boys' College will take all reasonable steps to provide a safe environment for all students whilst on campus, and advise students on actions they can take to enhance their personal security and safety.

The College will provide information to all International Students about emergency and health services and how to seek assistance and support in relation to a critical incident or any incident that significantly impacts on their safety, health and wellbeing.

Brisbane Boys' College's International Student Handbook and International Student Orientation Booklet outline the programs and resources available at the College to assist International Students with a variety of needs, including how to report an incident, and how they will be supported by the College should their health, wellbeing and/or learning be affected or impacted by a critical incident. The College will also refer or provide International Students to general information on safety and general awareness relevant to life in Australia.

There is a section on [Information for Emergencies](#) for students under [Health and safety](#) topics on the [Study in Australia – Live in Australia](#) web pages.

## 7. Assessment and responding to a Critical incident

Brisbane Boys' College has a Critical Incident Management (CIM) Plan in place that addresses the management by staff of a critical incident which has impacted a member or members of the College community, including international students.

The procedure includes how an incident must be responded to in addition to outlining the follow up actions required after an incident. Debriefing following an incident allows Brisbane Boys' College to learn from the incident and maintain best practice in how the College responds to future incidents.

The assessment of incidents assists Brisbane Boys' College in preventing similar occurrences in future. It also serves as a record of the incident itself that is able to be maintained and kept according to regulatory requirements. After an incident the debriefing of staff and documentation of support services offered to student and student's family, staff, witnesses etc also serve as a point of reference for improvement of processes and actions taken by the College following an incident.

In the immediate occurrence of a critical incident the Designated Officer is any Brisbane Boys' College staff member who if not a witness to the incident, is the first person to be informed of the incident or potential incident. It is the responsibility of the designated officer to ensure that the correct actions are undertaken in relation to responding to the critical incident depending on the immediate needs and circumstances.

## 8. Child welfare and protection

Where an International Student is enrolled at Brisbane Boys' College, Commonwealth and State legislation relating to child welfare and protection also needs to be adhered to aside from the requirements of the ESOS Act 2000.

Brisbane Boys' College must ensure that international students are given age-and culturally-appropriate information on:

- who to contact in emergency situations, including contact numbers of a nominated staff member(s)
- seeking assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse.

In the event of a significant or critical welfare issue involving the student, and if determined necessary by Brisbane Boys' College, a parent, legal guardian or approved relative agrees to travel to a designated location to assume care of the student until the situation has been resolved to the College's satisfaction. Depending on the nature of the incident, the expected response time for travel to Australia will vary. For example, travel to the designated location for a life threatening situation to a student would be two (2) days or less.

As a Child Safe Organisation Brisbane Boys' College must ensure that all individuals who work at the College in either a paid or volunteer capacity hold a valid Blue Card issued by Blue Card Services in accordance with the provisions of the *Working with Children (Risk Management and Screening) Act 2000* (unless an exemption applies under the Act).

## 9. Reporting an Incident

Where an international student has been involved in a critical incident it is important for both Brisbane Boys' College and the student that the incident is reported and managed appropriately. Emergency Services such

as police, ambulance or fire brigade should be called if the threat or harm to life or safety is imminent. If a report is made to an employee of the College after an incident has occurred, that employee must ensure that the correct process is followed in keeping with the Brisbane Boys' College Critical Incident Management Plan.

In accordance with the ESOS Act, Brisbane Boys' College must notify the Department of Home Affairs as soon as practicable after the incident. In the event of a student's death or other major incident affecting the student's attendance, the incident must be reported via the Provider Registration and International Student Management System. (PRISMS)

Brisbane Boy's College must maintain a written record of any critical incident and any remedial action taken for at least two years after the international student ceases to be an accepted student.

If Brisbane Boys' College is unable to contact an international student and there are concerns for a student's welfare, the College must make all reasonable efforts to locate the student including but not limited to;

- Notifying the police
- Notifying other relevant Commonwealth Government Agencies
- Notifying parents or legal guardians.

#### **Brisbane Boys' College procedure for reporting a missing international student after discovering a student is missing:**

- (i) contact police immediately;
- (ii) conduct a search (if appropriate) of the College campus or last known location;
- (iii) inquire with other students if:
  - (a) they know where the student may be and/or who the student may be with;
  - (b) there is any concern for the student's wellbeing (depressed, fearful, bullying, academic pressures, loneliness, etc.);
  - (c) any friends the student may confide in;
  - (d) any travel plans the student may have disclosed;
- (iv) record, if possible, what the student was last known to be wearing;
- (v) obtain a recent photograph of the student;
- (vi) identify when & where the student was last seen;
- (vii) identify if the student has any medical requirements, especially in relation to the medication which must be taken (insulin etc.), if the student takes medication, has the student taken the medication with them;
- (viii) check (if appropriate) the student's possessions to see if they have taken their possessions with them (electrical devices, tablet computer, clothing etc.);
- (ix) advise the student's parents and establish the most recent contact with the student, concerns for welfare, recent behaviour (talk of returning home, unhappy, etc.);
- (x) identify social media used by the student, including avatars (on-line names);
- (xi) identify bank accounts the student has access to (if known);
- (xii) ensure there is a single point of contact (max two persons) for police to contact with any inquiry outcomes.

#### **Contact with Queensland Police Service (QPS)**

In the event that the Queensland Police should come into contact with an International Student for

whom Brisbane Boys' College has accepted responsibility for the accommodation, support and general welfare arrangements under the Migration regulations, the QPS will contact the College via the Headmaster, Deputy Headmaster - Head of Senior School or Student Wellbeing or Director of Boarding. The QPS will provide sufficient information to Brisbane Boys' College to allow for the ongoing welfare, health and support of the student, whilst complying with the requirements under the relevant Privacy legislation.

The QPS [Operational Procedures Manual](#) outlines the QPS procedures for situations where police come into contact with international students.

Police may come into contact with international school-age students who may:

- (a) be victims of crime;
- (b) be involved in a traffic incident
- (c) be missing persons (see Brisbane Boys' College procedures below)

## 10. Unsatisfactory Course Progress or Attendance

Under the ESOS Act, Brisbane Boys' College is required to notify both students and the Australian Government when students have breached their student visa conditions as a result of having failed to maintain satisfactory course progress or attendance. Should a critical incident affect the student's ability to attend the course or satisfactorily complete the course, Brisbane Boys' College is to advise the relevant authority of such event to ensure that visa conditions are not breached. Please refer to the Brisbane Boys' College Course Progress, Attendance and Duration Policy for International Students available on the Brisbane Boys' College website at: <https://www.bbc.qld.edu.au/join-us/international-admissions/>

## 11. Brisbane Boys' College can no longer approve welfare

If an international student for whom Brisbane Boys' College has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW) has his enrolment suspended or cancelled by the College, the College will continue to be responsible for the welfare of the student until such time that any of the events listed below take place:

- Alternative welfare arrangements are approved by another registered provider.
- The care of the student by a parent or nominated guardian is approved by immigration or the student leaves Australia with an approved guardians consent.
- Where Brisbane Boys' College has notified immigration that it is no longer able to approve a student's welfare arrangements and it has taken all the required actions after not being able to contact the student.
- When Brisbane Boys' College is receiving a student who has had welfare arrangements approved by another registered provider it must negotiate the transfer date with the other provider in order to ensure there is no gap to the student's welfare provision, if the transfer is not able to be completed without a gap, Brisbane Boys' College is responsible for informing the student they need to maintain their welfare obligations as a condition of their visa.

Where an international student has their accommodation or welfare arrangements disrupted or Brisbane Boys' College is no longer able to approve the students existing arrangements the College will take all reasonable steps to ensure the student's parents or legal guardians are notified

immediately.

NB: if Brisbane Boys' College can no longer approve welfare of a student because of serious circumstances, and wishes to seek advice from the Department of Immigration, the procedure below should be followed **before making a report via PRISMS.**

- (a) Firstly, if the student is in danger, Brisbane Boys' College should contact the police and state welfare authorities before reporting it to Department of Immigration
- (b) All matters can be reported to a Department of Home Affairs (Immigration) officer on 1800 009 623. An interpreter can be arranged on this line if required.
- (c) When reporting, Brisbane Boys' College should
  - (i) make it clear that the student is under 18 years of age
  - (ii) advise the Department of Home Affairs (Immigration) officer if the incident / situation has been reported to another agency (e.g., police or welfare authority) even if the other agency may not have had time to assess the case
- (d) If the incident or situation is of a serious or sensitive nature that requires high level advice prior to reporting to the Department of Home Affairs (Immigration) duty officer, in the first instance contact:
  - (i) International Quality Unit by e: [internationalregistration@qed.qld.gov.au](mailto:internationalregistration@qed.qld.gov.au) or t: 3513 6748, or
  - (ii) Project Manager (International Education), ISQ by e: [mlane@isq.qld.edu.au](mailto:mlane@isq.qld.edu.au) or m: 0421 917 330

## 12. Communication following a Critical Incident

It is crucial that Brisbane Boys' College employees follow correct processes in relation to managing media enquiries. In the event of a critical incident, the Headmaster will determine the official College response in consultation with the Director of Marketing and Communications. The Headmaster may delegate media liaison to another member of staff. Any communications made during or after a critical incident will be made in accordance with the protocols outlined in Section 14 of the Brisbane Boys' College Critical Incident Management Plan – Managing the Media, including:

- All enquiries from the media should be directed to the Headmaster
- No comments should be made by employees to the media
- No interviews with students should be permitted
- Camera crews should be kept at a distance
- No student should be photographed without parental permission. If necessary, phones and other communication devices should be limited or handed in, depending upon the circumstances
- The implication of blame or fault for any part of the incident should be avoided at all times

### 13. Definitions

Word/Term	Definition
Critical Incident	A traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury.
CAAW Letter:	a Confirmation of Appropriate Accommodation and Welfare letter
CoE:	a document, provided electronically, which is issued by Brisbane Boys' College to intending overseas students and which must accompany their application for a student visa. It confirms the overseas student's eligibility to enrol in the particular course of the College.
ESOS Act:	The <i>Educational Services for Overseas Students Act 2000 (Cth)</i>
International Student:	a student currently enrolled at Brisbane Boys' College on a Student visa (subclass 500), including a student residing in Brisbane with a parent or relative approved by the Department of Home Affairs (Immigration); or a student for whom Brisbane Boys' College has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW) that is, student residing in the Brisbane Boys' College Boarding House.
Missing Student:	Student who cannot be contacted and has been absent from class and/or where there are substantial concerns for their welfare and safety. This includes Students who have been issued a CAAW Letter and who have failed to return to or reside in the Brisbane Boys' College Boarding House
National Code of Practice:	National Code of Practice for Providers of Education and Training to Overseas Students 2018 established under the ESOS Act. The code is made pursuant to the Education Services for Overseas Students Act 2000 and comprises 11 Standards that aim to ensure nationally consistent standards and procedures for CRICOS registered providers.
National Principles for Child Safe Organisations	The principles are drawn from the National Framework for Protecting Australia's Children and were written by the Australian Human Rights Commission following the Australian Governments Royal Commission into institutional responses into Child Sexual Abuse.