

 <p>SPJ GLOBAL</p> <p>S P Jain School of Global Management</p> <p>DUBAI • MUMBAI • SINGAPORE • SYDNEY</p>	<h2>Critical Incident Policy</h2>
Document Type	Policy
Administering Entity	President, Vice President – Administration, Heads of Campuses (HoCs)
Latest Approval/ Amendment Date	10 December 2025
Last Approval/ Amendment Date	21 June 21 2023
Approval Authority	Board of Directors
Indicative time of Review	9 December 2027

1. Purpose

- a. S P Jain School of Global Management (S P Jain / the School) is committed to providing an environment that conforms to all legislative requirements in respect to providing an environment that is safe and has well-maintained physical and electronic resources and infrastructure.
- b. The purpose of this policy is to ensure a clear, coordinated and effective response to any critical incident or event that has the potential to impact the safety, wellbeing or continuity of operations at any S P Jain campus.
- c. This policy must be read in conjunction with the School's *Health & Wellbeing Policy*, the *Business Continuity Plan*, the *Student and Staff Sexual Assault and Sexual Harassment Policies*, and relevant campus-specific safety and emergency procedures.

2. Overview

- a. Protecting the health and safety of employees, students, visitors, and the environment is of primary concern and S P Jain takes an active role in identifying hazards before injuries and illnesses occur. An effective critical incident program benefits the S P Jain community by reducing illnesses and injuries, preventing property damage, and preserving the environment.

- b. S P Jain will make every reasonable effort to promote, create, and maintain a safe and healthy environment through adherence to basic safety principles, sound management practices, and compliance with applicable federal, state, and local standards.
- c. The *Critical Incident Policy* also outlines the basic regulations for occupational and environmental health and safety concerns at S P Jain, stresses efforts to reduce accidents, ensures compliance with applicable health and safety regulations, and emphasizes S P Jain's commitment to a safe and healthy operation.
- d. The Campus Facilities Manager reporting to the Heads of Campuses is in charge of monitoring safety at their respective campuses and managing and reviewing the safety plan annually, to meet current needs.

3. Definition of a critical incident

- a. S P Jain's Critical Incident Policy lays out the procedures and actions to be taken in the event of a serious incident that involves S P Jain students, faculty, staff members and visitors. A critical incident is a traumatic event, or the threat of such which causes extreme stress, fear or injury and has the potential to affect the safety and well-being of S P Jain students, staff, faculty or visitors in a dangerous or tragic way. Critical incidents include, but are not limited to:
 - i. Serious injury or death
 - ii. Sexual assault, harassment or abuse
 - iii. Violence or threats of violence
 - iv. Robbery with threat of violence
 - v. Sudden or unexpected death or suicide of a work colleague, student or faculty
 - vi. Natural disasters
 - vii. Hazards including fire, chemical exposure or structural collapse
 - viii. Threat to IT systems including shut down of systems
 - ix. Bomb threats
 - x. High publicity violent crimes
 - xi. Unable to contact international student/missing student
 - xii. Drug or alcohol abuse
 - xiii. Any incident that is charged with extreme emotion
- b. Staff dealing with critical incidents related to sexual assault and sexual harassment should also refer to and be guided by the Student and Staff Sexual Assault and Sexual Harassment (SASH) policies.
- c. Where the incident affects business operations, teaching continuity or campus facilities, the procedures outlined in the *Business Continuity Plan (BCP)* must be followed alongside this policy.

4. Reporting of an incident and subsequent steps for handling an incident:

- a. All incidents are first reported to the Heads of Campuses or their nominee in the facilities team of respective campus, who is accessible at the time of the incident. If it is a member of the facilities team, she/he needs to escalate it to the Facilities Manager immediately.
- b. The Heads of Campuses/Facilities Manager investigates the reported incident and extracts as many facts as possible to identify the staff/student/faculty/visitor involved.
- c. On knowing what the incident is, and the persons involved, corrective steps need to be taken immediately by the Heads of Campuses. These could be:
 - i. Seeking emergency assistance – Police, Ambulance, Fire Brigade as required
 - ii. Notifying senior relevant staff as necessary to assist with managing the incident such as the Registrar, Manager – Information Technology, and facilities staff, Counsellors, PR and Media.
 - iii. Notifying security contractors if the incident is related to on-campus activities.
 - iv. Making immediate contact with the family member of the staff/faculty/student involved.
 - v. Providing ongoing support to the individual and other affected people as required such as counselling, medical support, and academic support.
 - vi. If required, making arrangements for the concerned individual to return home, or any other place, considered suitable.
 - vii. Notification to TEQSA if required under Material Change Notification provisions, or if the incident represents a risk to the School’s ongoing compliance under the TEQSA Act (2011) as a registered institute of higher education.
 - viii. Notifying the police and any other relevant Government agencies (like Commonwealth, state or territory agencies in Australia) as soon as practicable on applicable critical incidents mentioned in Section 3 including missing students who are not able to be located with efforts made as in 4c.
 - ix. Contact with the Department of Home Affairs (DHA) for all international students studying in Australia on a student visa that have been involved in or affected by a critical incident including missing student who are not able to be located as in 4c.
 - x. Contact with other regulatory or accreditation bodies as required.
 - xi. Coordinating with consulate or embassies, as required.
 - xii. Arranging for emergency travel/funds if required.
- d. A critical incident log should be maintained throughout the event by the Heads of Campuses. This should include:
 - i. Describing the incident, date, time and location
 - ii. Actions taken to manage the incident
 - iii. Persons involved, witnesses including full contact details.
 - iv. Details of notification and liaison with government agencies or representatives contacted, including TEQSA (where a Material Change Notification was required) and the Department of Home Affairs (DHA) in relation international students studying onshore in Australia.

- v. After the event the Facilities Manager should provide a full report detailing the Critical Incident to the Head of Campus.
 - vi. A debriefing meeting will be held with those involved in managing the incident to discuss the report and how the incident was managed. Further, the group may make recommendations on how to improve the response to the incident. The critical incident will be entered into a formal incident register and the file will be held for reference of any agencies/persons that may need to refer to the same. The Heads of Campuses are to ensure recommendations from the meeting are implemented.
 - vii. The Vice President – Administration will ensure that the critical incident log and other analysis for all campuses are reported annually to the Board of Directors.
 - viii. All documentation relating to critical incidents must be retained by the School for at least 2 years after the student ceases to be an accepted student for administrative and legislative purposes and for review in scheduled audit processes and as set out in the Record Management Policy.
- e. S P Jain is committed to safeguarding the privacy and confidentiality of all individuals involved in a critical incident. All personal, sensitive and incident-related information must be handled in accordance with applicable privacy and data protection laws in each campus jurisdiction. Information relating to an incident must be shared strictly on a need-to-know basis with authorised staff members. Data collected must be limited to what is necessary for the assessment of incident assessment, and reporting. Any disclosure must comply with relevant privacy legislation applicable to the campus location.
 - f. All incident-related documentation must be securely stored with restricted access and retained, with all storage and retention practices fully compliant with the School's *Records Management Policy*.
 - g. All communication relating to a critical incident must be carefully controlled; staff must refrain from sharing incident details informally or in public, and any external communication with media, authorities or third parties must be coordinated exclusively through the Head of Campus (or their authorised nominee).

5. Safety and Emergency Response Framework

- a. The School is committed to providing a safe and healthy environment for all students, faculty, staff and visitors. The Safety and Emergency Response framework is administered jointly by the Heads of Campuses (HoCs) and the Facilities Manager and encompasses proactive safety management, emergency preparedness, hazard identification and response procedures.
- b. HoCs are responsible for responding to incidents, coordinating emergency actions, and ensuring safety procedures are followed.

- c. Part of the mission of the Facilities Department is to provide a safe environment for the students, faculty, staff, and visitors. The Heads of Campuses and Facilities Manager coordinate all safety functions at S P Jain. These objectives are achieved through inspections, environmental surveillance, training, hazardous chemical management, and plan reviews.
- d. Efforts are channelled into several specialty areas including security, fire protection, occupational health and safety, asbestos management, environmental health, emergency planning and risk management.
- e. In accordance with regulatory requirements, the Facilities Manager conducts on-site inspections, recommends corrective actions for hazardous conditions, develops required safety regulations, conducts training, investigates accidents or occupational illnesses, maintains safety records and monitors overall program performance. These measures are implemented to reduce hazardous conditions that could cause injuries or occupational illnesses.
- f. In the event of any emergency involving risk to life, serious injury, major property damage or environmental harm, any staff member, student or visitor must immediately contact the appropriate emergency services (Police, Ambulance, Fire Brigade). S P Jain publishes a comprehensive list of emergency services and external support numbers for all campuses on the [Student Support webpage](#). This list must be referred to for up-to-date emergency service contact details.
- g. Upon arrival of emergency services, the area under concern must be isolated to preserve evidence and prevent further harm. The HOC or authorised staff member is responsible for securing the area in accordance with local legislation.
- h. Each campus shall have documented emergency equipment protocols and maintain inventory of fire suppression systems, alarms, defibrillators, lighting and first-aid kits, reviewed annually.
- i. The School will report relevant events to its insurance providers and other stakeholders as appropriate. Where required, the HoC will liaise with relevant external authorities (police, fire brigade, regulatory agencies such as TEQSA, DHA) and arrange for external communications or media statements.
- j. The School will ensure that all staff and students receive regular training in Safety and Emergency procedures to support a culture of preparedness. Annual refresher training will be scheduled by the Facilities Manager to reinforce evacuation procedures, hazard reporting pathways and first-response expectations.

- k. Students and staff with disclosed mobility or health conditions will be supported in developing personalised evacuation plans, and trained personnel will be assigned to assist where required.
- l. All incidents, near-misses, hazards, emergency responses, drills, equipment inspections and training activities will be recorded in the Incident Register and associated Safety & Emergency files maintained by the Facilities Manager.
- m. Where an incident has the potential to disrupt teaching, student services, IT systems, facilities operations or campus access, the Safety and Emergency response will be integrated with the School's *Business Continuity Plan*.
- n. The School will maintain procedures for responding to public health emergencies, including pandemics, infectious disease outbreaks and other health alerts. In such cases, the School will follow the directives of local health authorities.
- o. All members of the S P Jain community must ensure they understand and can carry out the Safety and Emergency Response requirements outlined in this section and must take immediate and appropriate action when an emergency arises, including following all directions issued by authorised personnel.

6. Student Responsibilities

- a. Should they be involved in any serious incident, students must immediately notify the Heads of Campuses and the Facilities Manager. A third point of reference is the Student Counsellor. Direct contact phone numbers are provided to students as part of their orientation information and personal identification cards.

7. Inspections and Safety Audit

- a. To ensure that S P Jain's policy for a safe and healthy environment is carried out, the Facilities Manager conducts periodic inspections of all facilities at respective S P Jain campus. The goal is to reduce accidents and injuries by eliminating safety and health hazards and unsafe practices among employees by conducting annual inspections of all facilities. Staff and students can strengthen personal safety by regularly reporting of potential safety risks to the Facilities Manager/Heads of Campuses at any time.
- b. Safety audits by external and appropriately qualified auditors of each campus will be conducted on a scheduled basis as recommended by the Risk Management and Audit Committee (RMAC) and approved by the Board of Directors in line with Occupational and Health Safety requirements or equivalent in each jurisdiction in which the School operates.

- c. Each campus will undergo a comprehensive safety audit on a four-yearly basis or earlier as required. The RMAC is responsible for developing an Audit Schedule, developing the scope of each audit against the relevant Occupational Health and Safety Standards and associated legislation applicable to each campus (noting jurisdictional and legislative differences within each of the School's campuses).
- d. Each safety audit will be reviewed by the Heads of Campuses, the RMAC and the Board of Directors. The outcome and ratings of the audit will be used to develop a rectification plan (if necessary, to address risk areas), an improvement plan (to mitigate risk) and/or changes to relevant policies or practices.
- e. The RMAC will use the findings, outcomes and response of the audit to inform regular risk management processes and risk ratings as set out in the Risk Management Framework.

8. Fire Safety

a. Fire Safety Plan

- i. Each campus will have a Fire Safety Plan, based on the format recommended by the NSW Fire Brigade or the local Fire Safety authority, which provides instructions for identifying, monitoring and addressing fire safety issues.

b. Fire Suppression Equipment

- i. S P Jain maintains various fire suppression systems on campus including: fire extinguishers, standpipes, fire hose reels and water pumps strategically placed throughout the premises. The Facilities Manager is responsible for maintaining an up-to-date inventory of all fire extinguishers and ensuring that equipment inspections occur in accordance with regulatory and manufacturer requirements.
- ii. While readily available, no one is encouraged to use a fire extinguisher unless they have received training in its use. Under no circumstances is anyone to endanger themselves or others in an attempt to extinguish a fire.

c. Drills

- i. Fire drills will be conducted regularly under the direction of the Facilities Manager to ensure staff, students and visitors are familiar with evacuation routes, assembly points and emergency procedures. Outcomes of fire drills will be documented and used to strengthen preparedness and training where required.

d. Reporting and Corrective Actions

- i. Deficiencies concerning unsafe conditions are reported to the building lessors in the inspected building by the Facilities Manager. Where the Facilities Manager identifies a condition that poses an immediate risk, the matter must be escalated for urgent correction and appropriate interim safety measures implemented until the hazard is resolved.

9. Procedures to be followed in the event of student death

- a.** In the event of a death of an S P Jain student on campus or in School provided housing, the Head of Campus, must contact the local police and/or ambulance immediately and direct to the site.
- b.** HOC or the staff attending must secure the area keeping it safe by, preventing further incidents and ensuring adherence to any non-disturbance requirements under the local region's governing laws.
- c.** The Head of Campus should advise the President, Vice President - Administration, the relevant Course Director (Dean) and the Director - Admissions of the incident immediately after notifying police. The following details should be provided:
 - i. student name;
 - ii. student number;
 - iii. course, campus and the duration the student attended the School;
 - iv. date of birth;
 - v. date of death (if known);
 - vi. cause of death (if known);
 - vii. detailed circumstances of death;
 - viii. name of next of kin; and
 - ix. contact address for next of kin.
- d.** The Head of Campus will identify repatriation and insurance information for international students.
- e.** Affected students and staff should receive counselling or other similar support as required. Support arrangements must be coordinated in accordance with the School's *Health and Wellbeing Policy*, ensuring access to relevant counselling and wellbeing services.
- f.** The Head of Campus liaises with the next of kin and/or relevant embassy or consulate for handling of repatriation and insurance information.
- g.** A memorial service will be organised by S P Jain for fellow students, staff and family to attend.
- h.** The relevant Course Director (Dean) will check the student's course progression in case the student may be eligible for a posthumous award or for a refund of fees paid. The relevant Course Director (Dean) will then determine whether an application for a posthumous award should be lodged for consideration by the Academic Board.
- i.** If the deceased is an enrolled international student studying in Australia there are additional reporting requirements under the Education Services for Overseas Students Act 2000 (ESOS Act) as follows:
 - i. As soon as practical, the Head of Campus must advise the Australian Government, Department of Education and Training, TEQSA, the Department of Home Affairs (DHA), Education Provider Liaison Officer of the details and circumstances of death.

- ii. PRISMS database should be updated ensuring that the Liaison Officer may prevent a letter being sent to the student's most recent recorded address thus minimising the possibility of further distress for the student's family.
- j. In the case of all other campuses, the Heads of Campuses must arrange to advise relevant Immigration Departments and government agencies as soon as practicable.

10. Procedures to be followed in the event of staff death on campus

- a. In the event of the death of a staff on campus, the Head of Campus, must contact the local police and/or ambulance immediately and direct to the incident site. HOC or the staff attending must secure the area keeping it safe by, preventing further incidents and ensuring adherence to any non-disturbance requirements under the local region's governing laws.
- b. The Head of Campus should advise the President, Vice President - Administration, campus HR and reporting manager of the incident immediately after notifying police. The following details must be provided by the HR staff:
 - i. Staff name;
 - ii. Staff code;
 - iii. Place of incident
 - iv. date of death (if known);
 - v. cause of death (if known);
 - vi. detailed circumstances of death;
 - vii. name of next of kin; and
 - viii. contact address for next of kin.
- c. The Head of Campus must:
 - i. liaise with the law enforcement agencies and the coroner's office, if appropriate, to arrange notification to the family of the deceased.
 - ii. act as the primary point of contact for the family of the deceased.
 - iii. draft and disseminate an announcement to the staff member's department and colleagues.
 - iv. liaise with the next of kin and/or relevant embassy or consulate for handling of repatriation
distribute the completed Death of a Staff Member Incident Report
- d. A memorial service will be organised by campus Human Resources Office for fellow students, staff and family to attend.

11. Procedures to be followed in the event of staff death off campus

- a. The person receiving the information must communicate the same to the Heads of Campuses. The following details must be provided:
 - i. Staff name;
 - ii. Staff code;
 - iii. Place of incident
 - iv. date of death (if known);

- v. cause of death (if known);
 - vi. detailed circumstances of death;
 - vii. name of the informer
 - viii. name of family member/next of kin
- b.** The Heads of Campuses must:
- i. advise the campus Human Resources Office and reporting manager.
 - ii. coordinate all communication with the family.
 - iii. draft and disseminate an announcement to the staff member’s department and colleagues.
- c.** A memorial service will be organised by campus Human Resources Office for staff, students, and family to attend.

12. Emergency Contact Details for each Campus

- a.** The School ensures that each campus has a nominated Emergency Contact. In the event of an emergency the School has nominated representatives as the School’s contact at each campus and these details are displayed at prominent areas on each floor on the campus and also detailed in the relevant Course Handbook.

Related Documents

- a. Course Handbook
- b. Health and Wellbeing Policy
- c. Staff Sexual Assault and Sexual Harassment Policy (SASH) Policy
- d. Student Sexual Assault and Sexual Harassment Policy (SASH) Policy
- e. Business Continuity Plan

Policy History and Updates Approved by the BOD

Version	Date Executed	Revisions	Approval
2	10 December 2025	Strengthened links with emergency preparedness, safety audits, fire safety procedures, and public health emergency protocols Refined wording throughout Section 4 to improve operational clarity, remove	Board of Directors

Version	Date Executed	Revisions	Approval
		<p>duplications, and align with sector best practice for critical incident management</p> <p>Introduced a dedicated privacy and confidentiality section, specifying need-to-know access, lawful disclosure, cross-jurisdictional privacy compliance</p> <p>Added specific requirements for secure storage of incident records, clarified retention periods (minimum five years for Australian operations), and aligned retention rules with the Records Management Policy.</p> <p>Added controlled communication expectations requiring all external communications (media, authorities, consulates) to be routed through the Head of Campus, preventing informal sharing of incident details.</p> <p>Elaborated responsibilities of Heads of Campuses, Facilities Manager and senior staff in reporting, escalation, and support for affected individuals.</p>	