Critical Incident Policy

Scope

This Policy applies to critical incidents that materially impact, arise out of, or are otherwise directly connected to, Kaplan's operations, activities, or responsibilities.

This includes critical incidents that involve, or could reasonably affect, students, employees, contractors, other workers and/or other persons, in connection with their studies, work or other dealings with Kaplan.

Purpose

This Policy establishes Kaplan's framework for preventing, preparing for, responding to, and recovering from critical incidents. Its purpose is to protect the health and safety of students, staff, and others connected to Kaplan, while also safeguarding property and reputation.

The framework that this Policy establishes is supported by measures implemented by the various Kaplan business units. Each Kaplan business unit maintains processes, procedures, plans, checklists, flowcharts or other measures relevant and appropriate for their operations.

The Policy also supports compliance with the Higher Education Standards Framework (Threshold Standards) 2021, the National Code of Practice for Providers of Education and Training to Overseas Students 2018, and the Standards for RTOs 2025.

It is acknowledged that the range of potential critical incidents is wide and the appropriate response for any incident will depend on the specific circumstances, which may be unique. Accordingly, this Policy is not intended to be overly prescriptive or inflexible. The matters outlined in this Policy should be applied 'as applicable' for the relevant incident. This Policy appropriately retains discretion for senior leaders to tailor Kaplan's response to the incident.

Principles

Kaplan is committed to acting reasonably and responsibly in all phases of critical incident management. Accordingly, Kaplan will take reasonable steps to:

- **Prioritise health and safety**. Promote a culture of healthy and safe work and study and uphold the importance of health and safety when addressing critical incidents.
- **Manage critical incident risk**. Identify, eliminate or—where elimination is not reasonably practicable—minimise foreseeable risks that could lead to critical incidents.

- **Provide appropriate resources.** Allocate suitable people, training, equipment and budget to support preparedness and response for critical incidents.
- **Escalate to senior leaders**. Ensure the Executive Team member responsible for any impacted Kaplan business unit is informed urgently of a critical incident. If they cannot be contacted, contact Kaplan's Managing Director or General Counsel instead.
- **Respond promptly and proportionately.** When responding to a critical incident, avoid unnecessary delays and follow relevant Emergency Plans. Where the incident is life-threatening and time-critical, contact emergency services immediately (000).
- **Offer support**. Provide clear information and, where practicable, facilitate reasonable medical, psychological, logistical or other assistance to affected persons.
- **Communicate accurately and responsibly.** Handle information appropriately. In most circumstances, information should be shared on a strict need-to-know basis and may be limited to a small group. Where appropriate, coordinated and factual updates may be provided to families, regulators, emergency services, media and other stakeholders. Staff handling information about a critical incident should take reasonable steps to (where applicable) maintain confidentiality, protect sensitive details, and ensure consistent and controlled messaging. In limited circumstances, disclosing confidential or sensitive information may be appropriate to mitigate harm.
- **Maintain continuity where safe**. Minimise disruption to learning activities and keep business operations running where reasonably practicable and safe to do so.
- **Review and improve.** Evaluate each critical incident, capture feedback and embed lessons learned to continuously improve Kaplan's systems and response.

Definitions

Critical Incident	a sudden, traumatic or life-threatening event (or credible threat) that causes, or is reasonably likely to cause, extreme physical or psychological harm, major service disruption, significant reputational damage or significant legal exposure. This includes but is not limited to death, serious injury or illness, sexual assault or serious violence, self-harm or suicide attempt, child abuse or neglect, serious racism, racial discrimination or racial vilification, large scale natural disasters, terrorism, pandemic or public health emergency.
Donesafe	Kaplan's online platform for reporting and managing health, safety, compliance, and critical incidents. It also functions as Kaplan's central register for critical incidents.
Emergency Plans	are documented procedures, maps, resources and training required to deal with emergencies at the workplace.
Kaplan	refers to Kaplan Australia Pty Ltd, Kaplan Business School Pty Ltd, Kaplan Higher Education Pty Ltd and Kaplan Education Pty Ltdand includes their schools and colleges in Australia.

Notifiable Incident	refers to that term as defined in the work health and safety legislation of the relevant jurisdiction. Generally, it includes the death of a person, a 'serious injury or illnesses', or a 'dangerous incident' – in each case, arising out of the conduct of Kaplan's business. For examples of serious injury/illness and dangerous incidents, please refer to SafeWork Australia guidance here.

Responsibilities

Role	Key duties
Relevant Executive Team member or their delegate	Determine Kaplan's response to a critical incident in accordance with the principles outlined in this Policy, make key decisions, communicate with key stakeholders, keep senior leaders informed.
Incident Coordinator, Managers / Leaders	Oversee the implementation of the relevant Executive Team member's instructions, coordinate incident response and emergency plans, coordinate support for affected persons.
Chief Warden / Warden Team	If applicable: Implement immediate onsite emergency response; coordinate with emergency services.
Health and Safety Team	Assist Kaplan to prepare for and respond to critical incidents, collaborate with business units to ensure maintenance of business specific measures, manage reporting obligations, conduct assessments and reviews.
Health & Safety Champion Group	Consult on health and safety matters, assist with risk identification, monitor controls, review lessons learned to continuously improve Kaplan's systems and response.
Workers, Students & Others	Follow reasonable instructions, evacuate where required, report incidents/hazards, do not disturb the site of a critical incident unless to save life or make safe.

Preparedness & Prevention

Kaplan maintains a range of preparedness and prevention measures to identify and manage risks and ensure effective response to critical incidents, including:

1. **Risk assessments** for foreseeable events.
2. **Emergency plans and procedures** – For example, site specific emergency plans and important procedures are stored on the emergency management intranet site.

3. **Training & drills**
    - Site induction for relevant workers, and for students who attend Kaplan campuses (not applicable to fully online cohorts).
    - Emergency Response Training for all relevant workers.
    - Evacuation drills – at least once yearly per site.
    - Chief Warden & Wardens – annual refresher.
    - First Aid, including CPR, and training for nominated First Aid Officers.
4. **Psychosocial hazard/risk controls** – targeted training modules, risk assessments, prevention plans, and controls regularly reviewed.
5. **Racism prevention and response measures** - to prevent, identify and respond to racism and racial vilification affecting students, staff and others, including in physical and online environments.
6. **Travel & Excursions**: Pre-departure risk assessments, traveller tracking (where available), and emergency contact protocols for study and business trips.

Incident Response Procedure

Immediate Actions

- In the case of a health or safety incident, make safe & evacuate – raise alarm, call *000 (or local equivalent)*, isolate hazards.
- Preserve the site, except to save life or prevent further injury or damage.
- If on a Kaplan site, Chief Warden and warden team will implement immediate onsite emergency response. Activate and follow emergency plan/procedures.
- Provide first aid / psychological first aid as required.
- Consult and adhere to the relevant critical incident flow chart (or equivalent) for your Business Unit to ensure the timely and appropriate escalation of potential incidents.

Incident Management

- Notify relevant Kaplan Executive(s) & H&S Team (if applicable) ASAP (within 30 minutes where practicable).
- If appropriate, Incident Coordinator/Senior Kaplan business leader will coordinate an initial critical incident meeting with key stakeholders as soon as practicable.
    - This may include the following - applicable Kaplan business leaders, Health & Safety, People & Culture, Risk & Compliance, Facilities, Legal, affected site managers etc.
    - During the meeting, known incident information will be shared and discussed; actions determined and assigned.

- Following the meeting, action log distributed and maintained by the Incident Coordinator.
- Those in the meeting will disseminate information to their teams on a need to know basis.
- The Incident Coordinator will oversee high level activities and track completion of actions.
- The Incident Coordinator will provide regular updates and organise additional meetings, where needed.
- After urgent issues have been addressed, the focus shifts from crisis management to business continuity and recovery.

Reporting

Note that critical incidents may be scrutinised closely (including for legal liability). It may be appropriate to consult with Kaplan's Legal team before reporting about critical incidents.

- As soon as possible, enter incident report in Donesafe (Kaplan's incident/hazard reporting system).
- Consider notifying police for criminal acts; workers compensation insurer within statutory timeframe; parents/guardians for students under 18 years.
- If it is a '**notifiable incident**' (see definition section above), the H&S team will notify the relevant health and safety regulator immediately by phone, with written notice within 48 hours. Please inform the H&S team urgently, who will complete this mandatory regulatory reporting.
- Where a critical incident affects an overseas student's visa conditions, enrolment, or welfare, Kaplan will report through PRISMS as required under the ESOS Act and National Code.

Communication & Privacy

- Executive Team appoints a single internal or external spokesperson.
- Use approved holding statements & templates; translate or adapt for key language groups.
- Disclose personal information only to the extent permitted by Privacy laws.
- Communications will be limited to a need-to-know basis, with a tailored communication plan developed on a case-by-case basis to ensure messaging is controlled and appropriate.

Support and Welfare

- Facilitate access to the Employee Assistance Program (EAP) and Student Counselling services, reminding affected individuals that support is available at any time. Where appropriate and reasonably practicable, Kaplan may provide or arrange additional support, such as safe refuge, transport, special leave, academic adjustments, trauma-informed debriefs, culturally appropriate support, or other assistance. For Sexual Assault and Sexual Harassment (SASH) matters, follow Kaplan's SASH Procedure.

- Implement Return-to-Work/Study Plans in partnership with medical providers and insurers, if applicable.
- Further information regarding available support services is provided in Appendix 1: Support Services.

Post Incident Recovery & Review

- Investigation: Kaplan will determine, at its discretion, whether an investigation is required and any timeframe that might apply to an investigation, and consideration should be given to whether legal professional privilege should apply.
- Complete the review of the initial Donesafe report – What happened following the incident, what corrective and preventative actions were taken; unresolved review actions escalated to Executive.
- Regulator Reporting (where required): Submit preliminary and, if requested, final reports; If applicable, cooperate with regulator's reporting requirements.
- Lessons Learned: An operational debrief will be conducted as soon as practicable following the incident. Key insights will be incorporated into the annual WHS Risk Register, inform training design, and be integrated into Kaplan's quality assurance and compliance monitoring frameworks.

Relevant Legislation

This policy is guided by, and operates in conjunction with, applicable legislation, including but not limited to:

- Applicable State WHS Acts & Regulations
- Privacy Act 1988 (Cth) & Privacy Act 2020 (NZ)
- Applicable State Workers' Compensation Acts & regulations
- Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Standards for RTOs 2025

Where there is any inconsistency between this Policy and legislation, the legislation takes precedence.

Amendments

Kaplan Australia reserves the right to amend this policy at its discretion. All changes and amendments to our policies are published on Kaplan Australia website.

Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officers to ensure compliance with this policy.

Policy Category	Corporate
Responsible Officers	Executive Director, People and Culture, Business Unit Executive
Implementation Officers	KBS: GM, Student Experience KP: General Manager or Head of relevant function in liaison with Business Head Pathways: College Directors
Review Date	September 2028
Approved by	
VP, Academic on behalf of the Academic Board	

Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.1	Academic Quality and Governance Team	Policy reviewed for currency, with the following changes made: • Language refined and content moved to enhance clarity and coherency. • Accountable and Implementation Officers introduced.	06.09.2017	30.09.2017
1.2	Academic Quality & Governance	Department of Immigration and Border Protection changed to the Department of Home Affairs	08.03.2018	09.03.2018
2.0	Quality, Regulations and Standards Team	Consolidated policy to incorporate all Kaplan businesses and included New Zealand. Responsible Officer role amended. Followed standard policy templates to add sections on principles, guiding procedures, relevant legislation and related policies.	28.10.2021	04.11.2021
3.0	HR and Safety team; Legal	Full review and rewrite. Clarification of scope, purpose and principles. Acknowledgement of specific business unit measures and discretion/flexibility. Other edits to clarify definitions, responsibilities and reporting obligations. Updates to support services available. Specific inclusions to support HESF 2026 amendments relating to prevention and response to racism and cultural needs.	28.07.2026	19.08.2026

Appendix 1:

Support services

In situations of immediate danger, call 000 for help from the Police and Ambulance. Please see the links below for further information and support.

The services available vary for students and employees and between Kaplan schools. Please refer to the provider websites, policy documents, and terms and conditions for current information.

Health and Wellbeing Support for International students

It is a condition of Australian Student Visas that individuals hold Overseas Student Health Cover (OSHC) for the full duration of their study in Australia.

Kaplan's preferred OSHC provider is Allianz Care Australia.

Students at Kaplan Business School, Kaplan International College Adelaide, The University of Newcastle College of International Education, and Murdoch College who have an OSHC policy with Allianz Care Australia may have access to a range of health, wellbeing and support services.

These services may include:

- Health and medical support
- Telehealth services
- Mental health and wellbeing support
- Safety and urgent assistance services
- Information about healthcare providers and claiming options

Students should refer to the Allianz Care Australia website, their policy documents, and the relevant service terms and conditions for the most up-to-date information about available services, eligibility and access.

Counselling and wellbeing support for Kaplan Professional students

Kaplan Professional engages Telus to provide confidential and free counselling to support the wellbeing of our students. Telus offers initial support and assistance to individuals who have personal and/or work-related issues that may impact on their:

- Wellbeing
- Work and study performance
- Safety
- Individual and workplace morale
- Psychological health

To access the Telus service, call 1835 871.

Safety, health and wellbeing support for employees

Sonder provides 24/7 access to safety, medical and mental health professionals and resources.

To activate Sonder:

Watch the video here

- Download the Sonder App from an App Store
- Enter your work email address (Kaplan, KBS or Murdoch College domains only)
- Complete the single-sign-on process as instructed
- Once completed, the account login is available
- For assistance with logging in, reach out to Sonder's tech team via hello@sonder.io

External services

Staff and students may also wish to access external support services, including emergency, crisis, medical, mental health or community support services.

Service Provider	Contact Details
Emergency	Dial 000 (AU) / 111 (NZ) or local equivalent.
Lifeline	Dial 131144 (AU) / 1737 Need to talk? (NZ)
SES	132500
Poisons Information Centre	131126
1800Respect	1800 737 732
Translating in interpreting services	131 450