

**Critical Incident Management Plan**

January 2024

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# 1 Introduction

Under normal circumstances Dusemond Study Programmes Ltd (DSP) provides a safe and secure environment for its students and staff to learn and work in. Crises or tragedies can occur and result in significant distress and disruption for all individuals involved as well as for the company and its partners. There are any number of possibilities requiring any number of responses and this policy outlines some of the procedures DSP will take if such an incident presents itself.

Nothing in this policy should affect the ability of any person to contact the emergency services in the event of a critical incident requiring immediate assistance. If you are in any doubt, you should dial 999 before contacting a member of the management team.

# 2 Definition of a critical incident

An incident becomes a critical incident when it constitutes a serious disruption arising with little or no warning on a scale beyond the coping capacity of DSP operating under normal conditions, and requiring the assistance of the Emergency Services and/or the Local Authority and others. Where there has been a death or serious injury arising through interpersonal violence, this will constitute a Critical Incident, regardless of the perceived capacity of DSP to cope. The incident or event may be unanticipated, imminent or in progress. It may occur on the property of a partner school, in the local community or during an off-site excursion.

A critical incident causes or is likely to cause:

* Injury, harm or illness to students, staff or anyone else affected by DSP’s activities
* Damage or loss to DSP property or reputation or that of its partners
* Serious disruption to the running of DSP activities
* Intervention by the police or regulatory authorities
* Adverse media attention

Examples of critical incidents may include but are not limited to the following:

* An accident, injury, illness or death of a student, staff member or anyone else affected by DSP’s activities
* An outbreak of illness or contagious disease affecting DSP student or staff
* Missing or abducted students and hostage situations
* Security breaches, intruder access or vandalism
* Criminal or terrorist acts
* Assaults on or acts of violence towards students or staff members or anyone else affected by DSP’s activities
* A fire, arson attack, explosion, bomb scare, chemical leak, the discovery of hazardous substances at a partner school site
* Natural disasters eg flooding or storm damage
* Unplanned evacuation of a partner school’s premises
* Damage to a partner school’s property or infrastructure including failure of services (gas, electricity, water etc) or IT systems
* Loss of key personnel or strike action
* Adverse media attention

# 3 Roles

The Critical Incident Management Team (CIMT) will be convened by Rupert Braun, the Chief Executive Officer of DSP. Depending on the nature of the critical incident he will select members of staff to draw up and execute a critical incident management plan. Minimally, this team will comprise, Rupert Braun, Benedetta Monterra (Director of Operations) and Veerle Ponnet (Academic Manager). A Critical Incident Manager (CIM) will be appointed.

The Designated Safeguarding Lead is responsible for matters relating to child protection, safeguarding and welfare and will provide support assistance information to staff and liaise with the appropriate child social services and medical staff. See Appendix 1.

# 4 Aims and objectives

This policy provides a framework to manage and recover from a critical incident affecting DSP and to minimise the risks to the health, safety and welfare of those affected and the damage or loss to property by identifying:

* Those who may be affected by the critical incident
* The types of incident and the threat that they may present to DSP
* Key activities and assets that may be threatened by a critical incident
* Measure and procedures to manage, investigate (where appropriate), and recover from a critical incident and its aftermath

Our objectives are to prepare for emergencies, by an ongoing process involving risk assessment, planning, training and reviewing of the critical incident management plan and also to consult members of the DSP community to gain their involvement and support.

# 5 Emergency procedure in the event of a critical incident

In the event of a critical incident, staff should:

* Assess the nature and extent of the critical incident
* Take immediate action to safeguard themselves and anyone else affected
* Summon emergency assistance and/or medical assistance (if required)
* Phone the Dusemond emergency number **(0203 286 7525)**

# 5.1 Managing the incident

The CIM will determine the composition of the CIMT, drawing on other members of staff as necessary.

* Once established the CIMT will take charge
* The CIMT will establish a Critical Incident Operations Centre as soon as practicably possible but until then the team acknowledges that it will need to be dispersed
* The CIMT will obtain accurate information about the critical incident as soon as possible and will seek to establish:
	+ The nature of the incident
	+ When, where and how the incident occurred
	+ Who has been affected and who might be affected
	+ The extent of casualties or damaged caused
	+ The involvement of 3rd parties including emergency services, regulators, local authorities

See Appendix 2.

# 5.2 Actions by the CIMT

The CIMT will:

* + Assess ongoing risks and take immediate steps to safeguard the health, safety and welfare of students, staff or anyone else affected by the critical incident
	+ Make adequate arrangements to liaise with the emergency services, partners, regulators, local authorities, investigators, insurers as required
	+ Ensure the emergency services are provided with up to date information including site plans, chemical storage, asbestos registers etc in conjunction with partner schools
	+ Take immediate steps to minimise disruption, as far as possible, to DSP activities, students, staff members, partner schools, parents or anyone else affected by the critical incident
	+ Ensure staff have an emergency mobile contact number
	+ Inform staff and students as soon as appropriate and in a way that provides clarity but is done so sensitively
	+ Provide information to and arrange support for and welfare assistance to pupils, staff or anyone else affected by the critical incident to include follow up support as appropriate
	+ Make arrangements to liaise with parents, agents, or anyone else affected by the critical incident
	+ Ensure DSP acts in a lawful manger and take steps to protect and preserve its legal position as well as that of the partner schools, and where necessary seek legal advice from DSP’s solicitors
	+ Contact DSP’s insurers where necessary, obtain confirmation of cover and obtain their approval/agreement to proposed actions
	+ Ensure that adverse publicity is minimised and that all external enquiries are handled by the appointed Communications Officer or other nominated personnel
	+ Make adequate arrangements to communicate with and where necessary provide a controlled response to the press and media
	+ Ensure that all appropriate site evacuation and health and safety procedures have been followed
	+ Ensure that DSP/partner schools’ premises and property are secure following the critical incident
	+ Activate contingency plans and/or interim measure in order to safeguard continuity of DSP activities where possible

# 5.3 Communicating with the media

On no account should staff other than the Chief Executive Officer or nominated Communication Officer make any comment to the media.

No comment will be given to the media with prior consultation with DSP’s solicitors and insurers.

Where appropriate DSP will consult with partners as regards to the content and timing of any announcements to the media.

All requests for information from the media should be referred to the nominated Communications Officer.

The Communications Officer will liaise with DSP’s solicitors and prepare a suitable press statement if so advised.

# 5.4 Reporting

The CIMT will be responsible for ensuring that DSP complies with its reporting and record keeping obligations in relation to the critical incident.

# 5.4.1 Statutory reporting obligations

Health and Safety Executive (HSE) – DSP is legally require to under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (SI 2013/1471) (RIDDOR) to report the following to the HSE:

1. Accidents involving staff
* Work-related accidents resulting in death or ‘specified’ injury (including as a result of physical violence) must be reported immediately eg loss of consciousness caused by head injury or asphyxiation, amputation)
* Work-related accidents which prevent the injured person from continuing with normal work for more than 7 days
* Cases of work-related diseases that a doctor notifies DSP of
* Certain dangerous occurrences (near misses – reportable examples include but are not limited to bursting of closed pipes, electrical short circuit, accidental release of any substance that may cause injury to health
1. Accidents involving students or visitors

Accidents where the person is killed or is taken from the site of the accident to hospital and where the accident arises out of or in connection with:

* Any DSP activity (on site or off site)
* The way a DSP activity has been organised or managed
* Equipment, machinery, or substances
* The design or condition of the premises

# 5.4.2 Notifiable diseases

If anyone on a DSP programme is known or suspected to be suffering from disease which is classified as a notifiable disease, and / or in the opinion of a registered medical practitioner has an infection and / or is contaminated in a manner which could present significant harm to human health (as set out in the Health Protection (Notification) Regulations 2010 (SI 2010/659)), the CIMT should ensure that a report is made by the proper officer at the relevant local authority.

# 5.4.3 Others

* The CIMT will also consider whether DSP is required to report the Critical Incident to any other regulatory body or organisation
* If the CIMT has any doubt about when or how to report a Critical Incident, or whether or not it should be reported, DSP’s solicitors should be contacted for further advice

# 5.5 Record keeping

Following a Critical Incident, DSP will take all reasonable steps to collect and preserve relevant evidence and documentation, this will be stored on the critical incident database.

During the management of a critical incident a log of actions taken and decisions made will be kept. See Appendix 3.

DSP will not keep evidence and documentation containing personal information, which has been collated as a result of a Critical Incident for any longer than is reasonably necessary in compliance with the Data Protection Act 1998 obligations and any subsequent amendments and in addition the UK-centric Data Protection Act 2018 that will work alongside the European legislation.

Where there is a risk of litigation, enforcement action or other proceedings, against or on behalf of DSP, documents (which include electronic documents) will be retained for at least six years unless:

* The Critical Incident involved a student or anyone else who was under the age of 18 at the time of the incident, in which case documentation will be retained at least until that person’s 24th birthday; or
* The Critical Incident may have resulted in exposure to a substance which may be hazardous to health, such as asbestos, and / or there is a risk that any person may develop an occupational disease or illness or work-related medical condition, in which case records should be retained for a minimum of 40 years

The CIMT will be responsible for ensuring that Dusemond complies with its reporting and record keeping obligations in relation to the Critical Incident.

# 6 Internal investigations

An appropriate member of the CIMT will be nominated to investigate the critical incident if an investigation is considered necessary.

Such investigations may be required in order to discover the immediate and/or root causes of a critical incident to prevent a recurrence, to carry out a disciplinary process, to brief lawyers/insurers for the purpose of obtaining legal advice or to aid litigation.

Where appropriate, the CIMT will seek legal advice before commencing an internal investigation.

The scope of the investigation may be restricted to fact-finding and may not make any finding of fault or allocation of blame.

The CIMT will not sanction any internal investigation which may prejudice the investigations of external agencies.

No admission of liability on DSP’s behalf should be made without legal advice and/or prior agreement from insurers.

# 7 Follow-up and review and monitoring

Where possible, DSP will make all necessary arrangements to ensure continuing provision of DSP activities. See Appendix 5.

DSP will consider arrangements for support and follow-up for staff and students who have been affected by the critical incident such as counselling.

Following a critical incident, this policy and any other relevant policies and procedures and/or risk assessments will be reviewed.

In any event, this policy will be regularly reviewed and records of relevant risk assessments and accidents will be regularly monitored. See Appendix 4.

# Appendix 1: Suggested Critical Incident Management Team roles and responsibilities

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| **Role** | **Responsibility** | **Possible candidates from DSP staff** |
| Critical Incident Manager | * Acts as or appoints DSP single point of contact
* Consider the need to alert other colleagues and external agencies
* Establish a Critical Incident Management Team
* Collate all relevant information relating to the emergency
* Co-ordinate the emergency response strategy for DSP, liaising with relevant services and partners as appropriate
* Monitor the emergency response
* Provide regular staff / team briefings
* Authorise any additional expenditure
 | Chief Executive OfficerDirector of OperationsDesignated Safeguarding Lead |
| Deputy Critical Incident Manager | * Assists Incident Manager
* Co-ordinates and manages staff in the Incident Management Team
* Monitors staff welfare and organises staff rota
* Liaises with the Emergency Services and other organisations as necessary
 | Chief Executive OfficerAcademic ManagerDirector of OperationsDesignated Safeguarding Lead |
| Parent liaison officer | * Advises parents and provides information
* Provides point of contact
* Arranges on-site co-ordination of visiting parents
* Maintains regular contact with parents where appropriate
 | Sales ManagerDirector of Operations |
| Administrator | * Staffs telephone
* Help collate information
* Relay incoming and outgoing messages
* Provide administrative support to the Incident Manager and Deputy
* Maintains a master log of key events and decisions
 | Operations ManagerAcademic Coordinator |
| Communications Officer/Media Spokesperson | * Acts as point of contact for media enquiries
* Works with the Local Authority communications team to prepare media statements
* Assist with internal communications
 | Chief Executive OfficerDirector of Operations |
| Student Welfare | * Maintain supervision
* Ensure the safety and security of pupils
* Co-ordinate the roll call registers.
* Provide information and offer reassurance
* Monitor pupils’ physical and emotional welfare
 | Academic ManagerDesignated Safeguarding LeadDirectors of StudiesSenior Teachers |

# Appendix 2: Critical Incident Form and Incident Management Situation Report

Use this form to record initial information received on the incident and to log updates. This form should be completed as soon as possible. Any updates must be recorded in RED.

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| **CALL INFORMATION** |
| Date: | Time: | Name: |
| Name of centre: |
| **INCIDENT DETAILS** |
| Description *detail nature of incident; names of any student(s) and/or staff involved, including age, names of group leaders* |
| How were you made aware of the situation? |
| Are there any casualties or fatalities? |
| Have the emergency services been called? When? Which service(s)? |
| Is this incident currently affecting DSP activities? If yes, which areas? |
| What is the actual threatened loss of staff or students? |
| What is the estimated duration of the incident? |
| Has access to the whole site been denied? If so for how long? |
| Which work areas have been destroyed, damaged or made unusable? |
| Are systems and other resources unavailable? (include computer systems, telecoms, other assets) |
| If so, which staff are affected by the ICT disruption and how? |
| Have any utilities (gas, electricity or water) been affected? |
| Is there media interest in the incident? (likely or actual) |
| Does the incident have the potential to damage the School’s reputation? |
| Other relevant information |

Further information on the incident to be entered on the following pages.

# Appendix 3: Critical incidents management update/decision log

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| **CRITICAL INCIDENT MANAGEMENT UPDATE/ACTION DECISION LOG** |
| Date | Time | Situation update |
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**Appendix 4: Critical Incident internal review form**

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| **CRITICAL INCIDENT INTERNAL REVIEW DOCUMENT** |
| Centre: | Date of incident: |
| Brief description of incidentWere emergency services involved?Were other external agencies involved? |
| Description of external support accessed |
| Key actions taken by DSP |
| What actions were taken by partners – if any? |
| What worked well? |
| What worked less well? |
| How could things have been done better? |
| Comment on DSP’s critical incident plan |
| What actions should be taken now? |

Form completed by:

Date:

**Appendix 5: Business continuity strategies**

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| **BUSINESS CONTINUITY STRATEGIES & CONTINGENCIES** |
| **1. Arrangements to manage staff shortages** |
| **Contingency** | **Notes/comment** |
| Transfer staff from other DSP centres |  |
| Increase class sizes temporarily |  |
| Academic management team teach |  |
| Contact supply agencies |  |
| Multi-tasking and cross-training so staff can cover for each other |  |
| **2. Arrangements to manage denial of access to premises** |
| **Contingency** | **Notes/comment** |
| Liaise with host school and identify any mutual support arrangements they have in place with other local schools |  |
| Transfer students between other DSP centres |  |
| Set up virtual and online learning  |  |
| Localising the incident eg isolating the problem and utilising different sites or areas within partner school’s premises portfolio |  |
| **3. Arrangements to manage loss of IT, telephony, power etc** |
| Regular back ups taken of data, photocopies stored on an off site |  |
| Flexible lesson plans |  |
| Revert to paper-based system – lessons, registers |  |
| Explore mutual support arrangements with local schools or identify other teaching areas within the partner school’s premises |  |
| **4. Arrangements to manage loss of key suppliers** |
| **Contingency** | **Notes/comment** |
| Coach companies – arrange for train travel, mini bus, taxis. Increase on-site activities temporarily. Reschedule excursions according to availability of coaches from original provider or others |  |
| Partner schools – maintain list of contacts with other schools/universities so these can quickly be approached. Explore mutual support arrangements with local schools. |  |
| Tourist attractions – increase provision of on site activities. Identify and promote alternative attractions and activities. |  |