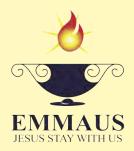


Melbourne Archdiocese Catholic Schools

## Emergency and Critical Incident Management Policy



## 1. Introduction

Melbourne Archdiocese Catholic Schools Ltd (**MACS**) is a company limited by guarantee established in 2021 by the Archbishop of the Catholic Archdiocese of Melbourne to assume the governance and operation of MACS schools across the Archdiocese of Melbourne. MACS subsequently established Melbourne Archdiocese Catholic Specialist Schools Ltd (**MACSS**) to provide educational services to children with special needs and Melbourne Archdiocese Catholic Schools Early Years Education (**MACSEYE**) to provide early years care and education services.

The <u>Statement of Mission</u> in the MACS Constitution, and the constitutions of its subsidiaries, MACSS and MACSEYE, sets out the Archbishop's expectations of Catholic schooling in the Archdiocese and provides an important context and grounding for the company and the direction which the MACS Board must always observe in the pursuit of the company's objects.

The Board must ensure that all policies and procedures concerning the operations of MACS, and its subsidiaries are consistent with the Statement of Mission and company objects, as well as any directions issued by the Archbishop from time to time.

## 2. Background

The Emergency and Critical Incident Management Policy (the 'Policy') outlines the critical incident and emergency management arrangements in place across MACS to prepare for, mitigate, respond to, and recover from, emergencies and critical incidents. By ensuring alignment with Victoria's emergency management arrangements and contemporary best practice, the Policy aims to ensure that the safety and wellbeing of MACS students, staff, parents, contractors, site users, and visitors is the highest priority through hazard prevention and mitigation and ensuring a standardised and effective response to hazard events.

To ensure a consistent and co-ordinated approach to emergency and critical incident management across MACS and when operating in a multi-agency environment, this Policy is underpinned by the MACS Enterprise Risk Management Framework and designed to align with the following:

- Victoria's emergency management arrangements (State Emergency Response Plan)
- The Victorian Registration and Qualifications Authority (**VRQA**) Minimum Standards and Requirements for School Registration
- Victorian Catholic Education Authority (VCEA) Emergency Management Framework and
- Department of Education (DE) Emergency Management Framework.

## 3. Purpose

The objectives of this Policy are:

- 1. Outline a best practice set of standards to support detailed emergency and critical incident planning and response across MACS.
- 2. Provide a common structure for how emergencies and critical incidents impacting MACS, its students and staff, schools, and offices, are managed and
- 3. Create clarity around the emergency and critical incident assessment and triage process, defining the scale of the response, and the relevant team and management plan.

### 4. Scope

The Policy provides the basis for emergency and critical incident planning and management throughout MACS offices and schools, including specialist schools operated by MACSS.

This Policy and the accompanying Emergency and Critical Incident Management Procedures are mandatory across MACS offices and MACS schools, including specialist schools operated by MACSS and school boarding premises operated by MACS schools.

The following hazard events are in scope:

- Critical incidents as defined in this Policy
- Emergencies as defined in this Policy and
- Minor, locally managed incidents at school or office level requiring the activation of the relevant Emergency Management Plan (**EMP**).

This Policy does not apply to:

- MACSEYE services and
- Complaints, complex cases, and incidents addressed under other policies, except for severe and ongoing events where a coordinated response from multiple teams across MACS is required.

## 5. Principles

Emergency and critical incident management is the discipline of identifying, mitigating, and managing risks. It involves a continuous cycle of planning, response, recovery and review, ensuring that observations and insights gained from each hazard event are applied to improve the response to future events.

MACS' approach to emergency and critical incident management aligns with the following principles:

#### All hazards

The all-hazards approach is an integrated approach that focuses on the capacities and capabilities critical to preparedness for any emergency event. The all-hazards approach is aimed at ensuring that MACS can manage the full spectrum of incidents and emergencies, not just those that have been foreseen.

#### Comprehensive approach

The comprehensive approach to emergency management promotes planning across the full incident cycle of prevention and mitigation, preparedness, response, recovery, and review. Observing the comprehensive approach ensures foreseeable risks are identified, vulnerabilities are mitigated, events are managed effectively, and recovery occurs to allow schools, offices, and communities to return to a functional state with as little disruption as possible. The review component ensures a structured approach to incident debriefing and lessons management, to allow for continuous improvement.

#### Flexible and scalable

Emergency and critical incident management arrangements are flexible to suit the needs of the situation and are scalable to provide the capacity to manage a hazard event as it escalates and deescalates.

#### Integrated and coordinated

Emergency and critical incident management arrangements are embedded across MACS to ensure a consistent and cohesive approach to managing hazard events. All areas of MACS with emergency and critical incident management responsibilities work together in a consistent and co-ordinated manner, including with external agencies.

## 6. Planning for emergencies

Effective emergency and critical incident management planning is a prerequisite to the co-ordinated and effective management of hazards and events.

Six categories have been developed to narrow the focus and allow for more specialised notification and response. These categories are as follows:

Domain	Category	Examples of incident type	
Incident	Minor event	A minor issue or event within the capability of the school to manage.	
Critical Incident	IT system security event	An IT-related event which materially impacts the ability of MACS schools and offices to deliver services to students or staff.	
Critical Incident	Personal security event	An event impacting one or more student, staff member, volunteer, contractor, or other person on a MACS site or activity with a significant and ongoing impact to wellbeing, safety or security.	
Critical Incident	Physical / infrastructure security event		
Critical Incident	Legislative breach / criminal act	A legislative breach or criminal act with the potential for significant reputational damage and/or financial loss, requiring a co-ordinated incident response from across MACS; includes compliance breaches, historical abuse claims, major fraud etc.	
Emergency	Natural disaster	A material natural hazard event impacting on a MACS school or office, its people, and/or activities; or material impacts to the environment from MACS activities.	

Table 1: Examples of incidents by domain and category

### 6.1. Incident management matrix

Table 2 provides guidance as to the management team and plan to be activated for specific incidents. The interconnected nature of the emergency and incident domains means that multiple teams and plans may require activation for the same hazard event. Where this occurs, it is imperative that a single incident commander is appointed to manage all aspects of the response – refer to *Principles of emergency and critical incident* management on page 7 for further information.

Not all events require the establishment of an Incident Management Team (**IMT**) and common-sense judgement is applied where thresholds are unclear or definitions are imprecise in the circumstances of the situation. The establishment of an IMT is always guided by an assessment of the incident's severity (refer to the severity matrix in Section 8.3 Table 3, p9), and the required organisational response (refer to the criteria for establishing an IMT in section -6.4).

# Table 2: Responsible management teams and plans by event domain and category, for in-scope events

Domain	Category	Management Team	Management Plan
Emergency	Natural disaster Environmental	Incident Management Team	
Critical Incident	Personal security Physical / infrastructure security Legislative breach / criminal act	Incident Management Team	MACS Emergency and Critical Incident Management Procedures
	IT system security event	Cyber Incident Response Team (CIRT)	ITS Cyber Security Incident Response Plan (for response)

Domain	Category	Management Team	Management Plan
			MACS Emergency and Critical Incident Management Procedures (for coordination)
Incident	Local Incident	Local Management	School / Office Emergency Management Plan

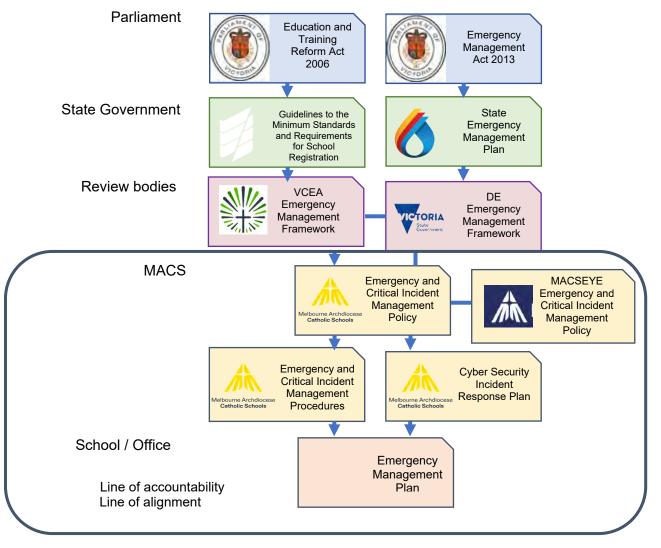
### 6.2. Emergency and critical incident management planning context

Figure 1 (p5) outlines the emergency and critical incident management planning context applicable in MACS. It illustrates the reporting relationship between the school-based Emergency Management Plans, MACS Emergency and Critical Incident Management Plan and Cyber Security Incident Response Plans, this Policy, and the VCEA Emergency Management Framework and beyond.

It also illustrates the alignment with Victoria's emergency management arrangements, through the DE to the State Emergency Management Plan (**SEMP**).

Note: This is a MACS-centric illustration that does not attempt to capture all interrelationships.

Figure 1: Emergency and Critical Incident Management Planning Context



### 6.3. Planning requirements

Each school and office facility must have an EMP contextualised for the environment, including local hazards and arrangements. This EMP must be reviewed at least annually and following any incident or exercise/drill debrief.

All EMPs must be completed on the relevant MACS template, undergo a self-assurance process using the EMP Audit Checklist, be submitted to MACS Emergency Management, and be exercised (drilled) at least once per quarter / school term. MACS Emergency Management will provide specialist support as required to facilitate compliance with these requirements.

The MACS Emergency and Critical Incident Management Plan and Cyber Security Incident Response Plan will detail the arrangements for the planning and preparation, response, recovery, and review of emergencies and critical incidents at a MACS-wide level. These plans must also be reviewed annually and following any incident or exercise/drill debrief.

Further detail on the development of Emergency Management Plans and how to acquit all relevant compliance requirements is available in the Emergency and Critical Incident Management Procedures.

### 7. Governance

MACS has an integrated and co-ordinated organisational response to an emergency or critical incident at school, MACS office (regional and/or central), and executive leadership levels to provide operational, tactical, and strategic levels as required.

An emergency or incident will be managed at the lowest level of effective control; the response will escalate where the demands of the event are greater than that level's capacity to effectively manage it.

Functional incident governance arrangements align with broader emergency management in Victoria, to ensure interoperability with external agencies including the DE, other State Government departments, and police, fire, and ambulance services and other response agencies.

Figure 2 illustrates the MACS functional incident governance arrangements in the broader Victorian emergency management context.

Figure 2: MACS functional incident governance arrangements for emergency management

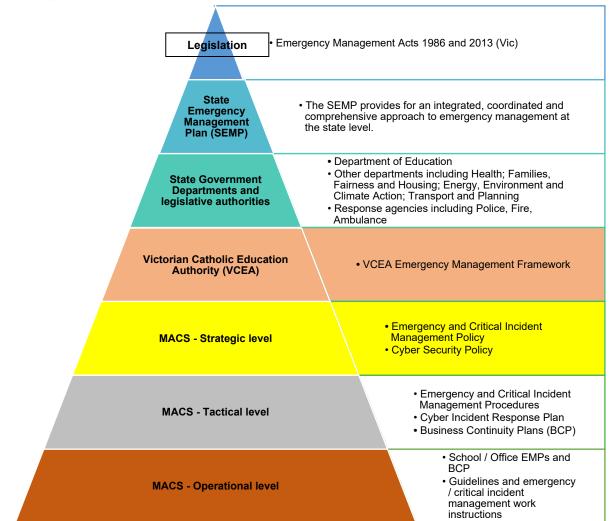
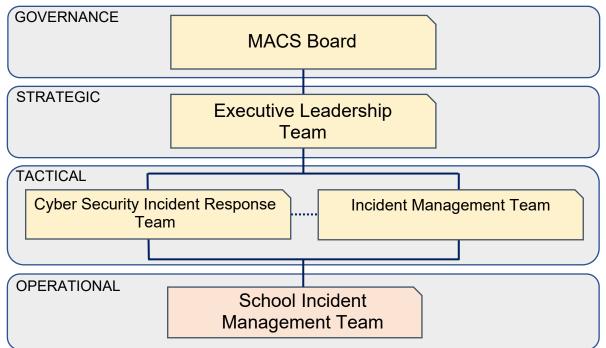


Figure 3, below, outlines the functional governance approach to emergency and critical incident management in MACS.

Figure 3: Functional Emergency and Critical Incident Governance Arrangements



## 8. Response Management

### 8.1. Principles of emergency and critical incident management

MACS emergency and critical incident management arrangements are based on the Australasian Inter-Service Incident Management System (AIIMS) five key principles:

#### 1. Management by objectives

MACS Incident Commander, in consultation with the integrated Critical Incident / Emergency Management Team determines the objectives to ensure all involved are working towards a single set of objectives.

#### 2. Span of control

The span of control concept relates to the number of groups or individuals that can be successfully supervised by one person and will vary to ensure effective supervision is maintained.

#### 3. Flexibility

The size and structure of the IMT must be flexible to the needs of the hazard event. As the size or complexity of the event changes, the size and activated functional areas should change. This includes a managed demobilisation as the response draws to a close.

#### 4. Unity of command

The concept of unity of command requires that one person is in command of the response to the event (the Incident Commander), and that there is a single line of reporting for all involved in the incident. That is, that everyone working in the management team reports to only one functional supervisor.

#### 5. Functional management

Tasks and roles are delegated into functional areas to ensure all critical management functions are performed. Common functional areas are Command, Operations, Planning, Logistics, and Information. An individual tasked with oversight of a function area is the functional officer – for example, the Operations Officer or Logistics Officer.

Procedures and plans operationalising this Policy will provide guidance to response teams on functional structures to effectively support response activities.

### 8.2. Emergency and critical incident response process

MACS follows a standardised five-step approach to emergency and critical incident response. All emergency and critical incident management procedures and plans align to this high-level process.

Multiple steps in this process may be initiated simultaneously where required.

The Emergency and Critical Incident Management Procedures provide further detail on how to manage emergencies and critical incidents using the five-step response approach.

#### Figure 4: MACS five-step emergency and critical incident response process



### 8.3. Hazard event assessment and triage

Emergency and critical incident management plans are used for a range of hazard events, ensuring a consistent and scalable approach as well as familiarity with the response arrangements in the event of a major or severe event.

Table 3 (p9) is used to determine the severity of the hazard event and provide guidance as to the response required. Refer to specific hazard event guides for more detailed information.

	Severity	Event Impact (or potential impact)	Response Required
VCIDENT	Severe	<ul> <li>Hazard events with severe and catastrophic impacts for people, facilities, or the organisation.</li> <li>Fatal or life changing injuries, multiple significant injuries from a single event, serious and imminent threat of violence.</li> <li>Significant reputation damage with third parties.</li> <li>Critical service unavailable for protracted period, major security breach with sensitive data loss.</li> <li>Complete loss of office or school.</li> </ul>	Managed centrally by MACS Office IMT. Notice to the MACS Board, VCEA, Emergency Management Notification timeframe: Immediately after initial management actions
EMERGENCY / CRITICAL INCIDENT	Major	<ul> <li>Hazard events with significant impacts for people, facilities, or the organisation.</li> <li>Single significant or multiple minor to moderate injuries from a single event.</li> <li>Significant impact to student welfare or learning. Moderate or potential reputational damage with third parties.</li> <li>Significant degradation or partial unavailability of a critical system, minor security breach with low-level data loss.</li> <li>Temporary loss of access to school or office.</li> </ul>	Managed at lowest level of effective control as determined by MACS Office in consultation with principal / RGM. Management team established if required. Notice to ELT, VCEA, Emergency Management Notification timeframe: Immediately after initial management actions
CIDENT	Moderate	<ul> <li>Hazard events with moderate or medium duration impacts for people, facilities, or the organisation.</li> <li>Minor to moderate injuries involving lost time or medical attention.</li> <li>Moderate impact to student welfare or learning.</li> <li>Moderate or pending reputational damage with third parties.</li> <li>Minor or short duration critical system outage or security breach without data loss.</li> </ul>	Managed locally. Notification to Director level, VCEA, Emergency Management Report timeframe: 24 hours
LOCAL INCIDENT	Minor	<ul> <li>Hazard events with minor or short-term impacts for people, facilities, or the organisation.</li> <li>Single, isolated minor injuries requiring basic first aid.</li> <li>Minimal impact to student welfare or learning.</li> <li>No reputational damage with third parties.</li> <li>Short-term service outage with minimal impact on school operations.</li> </ul>	Managed locally, routine reporting
	Insignificant	<ul> <li>Minor hazard events or near misses with no or very limited impact on people, facilities, or the organisation.</li> </ul>	Managed locally, routine reporting

## 9. Establishment of an Incident Management Team

An IMT will be established for events that are:

- impending, ongoing, and/or have the potential to materially escalate, and
- require a co-ordinated response, and
- require the involvement of multiple teams from across MACS, or a whole of organisation response
- or as outlined in an emergency / critical incident management plan aligned with this Policy.

Accountability for establishing an IMT rests with:

- for MACS IMT Emergency Management Coordinator and
- for school IMT Principal or senior school leader in attendance.

An IMT can be established by the following:

- school IMT: Principal, or senior staff member in the absence of the principal
- office / Facility IMT: MACS Executive or senior staff member in attendance
- MACS wide IMT: Emergency Management Coordinator; Manager, Risk; General Manager, Risk, Compliance and Assurance; General Manager, IT Security Audit and Risk; Chief Technology and Transformation Officer, a MACS Executive, the Executive Director and / or, as outlined in an Emergency / Critical Incident Management Plan aligned with this Policy.

Upon establishment of an IMT, an Incident Commander will be appointed by the person establishing the IMT. For school and office / facility IMTs this will default to the person authorised to establish the IMT. For MACS wide IMTs, the Emergency Management Coordinator or an approved MACS Incident Commander will be appointed.

### 9.1. Psychological support during and after a hazard event

Psychological support, tailored to the requirements of the impacted cohort, should occur as soon as the need is identified. Response plans will identify the supports available and information on how to activate.

Psychological injury following a hazard event may require consideration for support for those assisting in the response, and others across the organisation. Psychological support may be required for a protracted period. Where psychological support is required to continue following transition from emergency recovery to business as usual, MACS will ensure the necessary support is provided. The Emergency and Critical Incident Management Procedures provides further guidance for arranging psychological support in relation to an event.

## 10. Communications

The timely flow of accurate and reliable information between all stakeholders is vital to an efficient and effective response. Hazard and warning information must be made available rapidly to those who require it.

### 10.1. Communicating hazards and warnings

Key staff at all schools must use the VicEmergency platform to be notified of hazards and warnings impacting their school, its bus routes, and excursion destinations when students are off-site.

Principals must ensure school emergency contact information is kept up to date on CEVN. This information is used by MACS Emergency Management to communicate serious hazards and warnings as a supplement to VicEmergency's alerting, and for hazards not issued on VicEmergency (e.g., threats communicated via the DE).

#### Initial event notifications

It is the responsibility of the Incident Commander to ensure the appropriate internal notification has occurred. Procedures and plans sub-ordinate to this Policy will include details about how initial event notifications will be carried out.

Where a hazard extends to other site users (such as before and after school care providers and community groups) and co-located churches and parish buildings, immediate notification is required to allow them to implement their own emergency response measures. Emergencies and critical incidents also require immediate internal notification to ensure response teams (such as MACS Emergency Management) and the MACS Executive and Board are aware of events.

### 10.2. Internal communications

During the response to an emergency or critical incident, the IMT will meet to establish a common understanding of the situation, the response strategy, and the controller's intent. Frequent meetings will occur during the initial response period (e.g., hourly), with reduced frequency as the situation stabilises.

The MACS Incident Commander will ensure the meeting schedule is determined and communicated in advance of the first meeting, and at the conclusion of each meeting.

Briefings and Situation Reports (SITREPs) will be communicated using the following standard format:

- Situation detailed information about the incident and its impacts
- Mission what is planned to resolve the incident or make it safe
- Execution what actions will be undertaken to achieve the mission
- Administration and Logistics what resources are required to achieve the mission
- Command, Control, and Communications who the key people involved in the incident are (across the school and other agencies), what command and control structures are in place, and how communications are being maintained; and
- Safety outline any safety issues, and how risks to safety are being mitigated.

### 10.3. Stakeholder communications

The emergency and critical incident management planning process includes identifying key stakeholders required to be informed and kept appraised of significant events and their response and status. These include (but are not limited to):

- Line management (e.g., General Manager (Regions))
- MACS Office (Emergency Management, Education Excellence and other relevant contact points)
- Parish priest
- Staff and students and
- Families / school community.

Schools and offices must ensure they have identified their key stakeholders, that their emergency management plans contain multiple methods of contact, and that redundancies for critical communications channels are maintained.

#### 10.4. Media management

The Information function in a MACS office IMT will be fulfilled by the MACS Strategic Communications team. This may constitute a full Crisis Communications Group (**CCG**) according to the MACS Communications Protocol, a single Information Officer, or another structure as determined by the requirements of the event.

Only the Executive Director or their delegate is authorised to speak to the media on behalf of MACS, or regarding emergency incidents involving more than one MACS school.

Principals are authorised to speak to the media on behalf of their school only. Media requests must first be referred to the General Manager, Strategic Communications and Engagement.

## 11. Continual improvement and review

### 11.1. Debriefing and lessons management

Formal incident debriefs are required for all events with a severity rating of Severe, where a MACS IMT was established, or where required by the General Manager, Risk, Compliance and Assurance; Chief Technology and Transformation Officer, a MACS Executive, the Executive Director, or where required by an incident or emergency management plan aligned with this Policy.

Formal debriefs may be conducted for any other events where a debrief may hold value for continual improvement. A written debrief report must be produced for each formal debrief outlining the series of events, the timeline, what aspects of the response were positive or effective, and what aspects require improvement. Initial actions to address actions from the debrief will be documented and assigned; these often include updating or amending an EMP or undertaking further training or exercising in a specific area. Incident debriefs are part of the MACS lessons management procedure and are distinct from incident investigations for other purposes (such as OHS investigations). The Emergency and Critical Incident Management Procedures provides further detail on debriefing and lessons management.

### 11.2. Plan review

All EMPs require review:

- following each activation for an emergency or drill
- where a change renders part of the plan obsolete (e.g., capital works or changes to bus routes) and
- annually.

The Principal is accountable for ensuring school-based plans are reviewed as required.

For MACS offices, this accountability lies with the Emergency Management Coordinator.

## 12. Roles and reporting responsibilities

The table below sets out the roles and responsibilities across MACS.

Role	Responsibility	Reporting requirement
MACS Board	Accountable for emergency and critical incident management across MACS.	Ongoing
MACS Board	During protracted 'Severe' critical incidents or emergencies, meet as required to provide governance oversight of response.	Ongoing
Child Safety and Risk Management Board Committee (CSRM)	Review the Policy and endorse for board approval.	Annual
CSRM	Monitor preparation, mitigation, response, recovery, and review activities for emergencies and critical incidents through the Emergency and Critical Incident Management Report.	Quarterly
CSRM	Monitor the implementation and effectiveness of the Emergency and Critical Incident Management Policy across all of MACS.	Quarterly
Executive Leadership Team ( <b>ELT</b> )	Undertake strategic coordination of major emergencies and critical incidents requiring a whole-of-MACS response.	As required
ELT	Ensure any emergencies and critical incidents notified into own directorate are reported and managed according to the Emergency and Critical Incident Arrangements.	As required
Director, Child Safety and Risk	Provide quarterly emergency and critical incident management reports to the ELT, CSRM and the Board if required.	Quarterly

Role	Responsibility	Reporting requirement
Director, Child Safety and Risk	Undertake internal notification of emergencies and critical incidents to the ELT, CSRM and the Board.	As required
Senior Leadership Team (SLT)	Assist in the tactical coordination of major emergencies and critical incidents requiring a whole-of-MACS response.	As required
SLT	Assist with coordination of emergencies and critical incidents in line with the Policy in schools within own region.	As required
General Manager (Regions)	Assist schools with coordination of emergencies and critical incidents in line with the Policy.	As required
Principal	Conduct risk assessment to identify current risks and hazards.	Annual attestation to the Executive Director
Principal	Develop an EMP using the prescribed template.	Provide EMP to MACS Emergency Management
Principal	Conduct drills quarterly and review EMP annually.	Provide updated EMP and report on drills conducted to MACS Emergency Management
Principal	Manage the school's response to emergencies and critical incidents.	Emergencies and critical incidents are to be reported to MACS Emergency Management as soon as practicable
MACS Emergency Management Office ( <b>EMO</b> )	Support schools and offices to meet EMP requirements.	MACS Board through the CRSM
EMO	Develop and review as required an Emergency Management Plan for each office.	MACS Board through the CSRM
EMO	Support schools and offices in responding to emergencies and critical incidents.	ELT and Board through internal notification processes as outlined in the Emergency and Critical Incident Management Procedures
EMO	Ensure MACS has the capability to effectively respond to emergencies and critical incidents through the provision of policies, procedures, plans, training, and exercising as required.	MACS Board through the CSRM
Approved MACS Incident Commanders	Establish and control IMT.	ELT and Board through internal notification processes as outlined in the Emergency and Critical Incident Management Procedures

## 13. Definitions

Definitions of standard terms used in this Policy can be found in the <u>Glossary of Terms</u>.

#### Bushfire at Risk Register (BARR)

Inclusion on the Victorian Government Bushfire At-Risk Register is a trigger for the school, kindergarten, or childcare facility to pre-emptively close on days declared Code Red in their Bureau of Meteorology (BoM) district, and to undertake other bushfire preparedness measures as prescribed by the VRQA Guidelines on Bushfire Preparedness.

#### Catastrophic fire danger

Catastrophic is the highest level of fire danger in Australia and signifies the worst conditions for grassfire or bushfire. Fires that occur under these conditions can be expected to spread rapidly, threaten lives and property, and be difficult for firefighters to control.

#### **Critical incident**

A critical incident is an event that may adversely affect a MACS school or office and requires an immediate response. It is likely to cause significant personal illness or injury, substantial impact to operations, a degradation of reputation, or lead to an impact on the wider community. Business-asusual processes are unable to resolve the situation, and likely impacts are beyond the procedures and capacity of the areas involved. These may include, but are not limited to, actual or alleged events or situations that:

- cause actual or potential significant or life-changing injury or impact to a person.
- affects or risks affecting the continuity of school operations, including cyber-security, physical security, and property damage incidents.
- is a significant child safety incident.
- involves actual or potential significant reputational damage.

#### Incident Management Team (IMT)

The team identified in this Policy as being responsible for the response to an emergency or critical incident. The Incident Management Team is typically led by the principal or Emergency Management Coordinator as the Incident Commander, as the person in charge of the emergency and related decision-making.

#### Emergency

This relates to all emergency events as defined in Section 3 of the *Emergency Management Act 2013* (Vic). This includes the actual or imminent occurrence of an event which endangers or threatens to endanger the safety and health of a person, or which destroys or damages or threatens to destroy or damage, MACS owned or managed assets, including but not limited to:

- earthquake, flood, windstorm, or other natural event
- fire
- explosion
- road accident or any other accident
- plague, epidemic, or contamination
- security threat
- hijack, siege, or riot
- disruption to an essential service.

#### Emergency exercise or drill

A site-specific exercise conducted to determine the effectiveness of the emergency response procedures, maintain awareness and skills, also referred to as a 'drill' throughout this Policy.

#### **Emergency Management**

The process of preparing for, responding to, and recovering from emergencies and critical incidents. For simplicity, references to "emergencies" and "emergency management" should also be taken to include critical incidents unless otherwise specified.

#### Hazard event

Hazard events being emergencies, critical incidents, and incidents.

#### Incident

Incidents involve events posing a health, safety, wellbeing, or facilities risk that fall outside the definition of an emergency or critical incident. These include:

- **Reportable Conduct:** The threshold for reporting child abuse incidents, disclosures, concerns, or suspicions has been set deliberately low by the joint protocol PROTECT: Identifying and Responding to All Forms of Abuse in Victorian Schools. This protocol focuses on Four Critical Actions that all our school staff must take if they form a suspicion or reasonable belief that child abuse has occurred, or that a child is at risk of suffering abuse.
- **Complex Issues:** Complex issues are defined in, and managed under, the MACS Complaints and Critical Issues Framework.
- Local Incident: Local incidents are incidents assessed as having a severity level of *Insignificant, Minor,* or *Moderate,* that are capable of being managed at a local level (with or without regional oversight as required). They are managed under the Emergency Management Plan for the facility where the incident occurred.

#### School environment

Means any of the following physical, online, or virtual places used during or outside school hours:

- a campus of the school
- online or virtual school environments made available or authorised by MACS or a MACS school for use by a child or student (including email, intranet systems, software, applications, collaboration tools and online services)
- other locations provided by the school or through a third-party provider for a child or student to use including, but not limited to, locations used for camps, approved homestay accommodation, delivery of education and training, sporting events, excursions, competitions, and other events) (Ministerial Order No. 1359).

#### Staff

In the context of this policy, in line with the MACS Code of Conduct, staff refers to all people who carry out work in any capacity for MACS or its subsidiaries, and includes Directors of the MACS Board, Board Committee members, employees, volunteers, consultants, contractors and School Advisory Council members.

## 14. Related policies and documents

#### Supporting documents

Emergency and Critical Incident Management Procedures Cyber Security Incident Response Plan Emergency Management Plan Template

#### **Related MACS policies and documents**

Cyber Security Policy Complaints Handling Policy for MACS Schools Risk Management Framework Risk Management Policy PROTECT Identifying and Responding to Abuse – Reporting obligations Policy PROTECT Procedure: Responding to all forms of child abuse PROTECT Procedure: Responding to offences under the *Crimes Act 1958 (Vic)* PROTECT Procedure: Responding to student sexual offending Reportable Conduct Policy Communications Protocol Strategic Communications Policy Code of Conduct for MACS Staff Instrument of Delegations

## 15. Legislation and standards

The Occupational Health and Safety Act 2004 (OH&S Act) The Education and Training Reform Act 2006 (ETR Act) Education and Training Reform Regulations 2017 (ETR Regulations) Guidelines on Minimum Standards and Requirements for School Registration Guidelines on Bushfire Preparedness – Registered Schools and School Boarding Premises.

## **Policy information**

Responsible executive	Director Child Safety and Risk Management
Policy owner	Director, Child Safety and Risk
Approving authority	MACS Board
Assigned board committee	Child Safety and Risk Management
Approval date	25 March 2025
Risk rating	Extreme
Review by	Annual – March 2026
Publication	Gabriel, CEVN

POLICY DATABASE INFORMATION	
Assigned framework Risk Management Framework	
Supporting documents	See list of supporting documents and related policies above
Superseded documents	Emergency Management Planning Policy – Schools – v1.0 – 2021 Emergency Management Planning Policy – Schools – v2.0 – 2022 Emergency and Critical Incident Management Policy – v1.0 – 2024