



# HOLMES UNIVERSITY FLORIDA

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## PD25 – Critical Incident Policy and Procedures

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| <b>Policy Code</b>  | PD25                                                       |
| <b>Policy Title</b> | Critical Incident Policy and Procedures                    |
| <b>Domain</b>       | F – Health and Safety                                      |
| <b>Internal Ref</b> | F.25                                                       |
| <b>Jurisdiction</b> | Florida, United States – Holmes University Florida (HUF)   |
| <b>Version</b>      | 1.1                                                        |
| <b>Policy Owner</b> | Director of Risk and Compliance, Holmes University Florida |
| <b>Approved By</b>  | Holmes University Florida Board of Directors               |

### 1. Related Policies

- PD15 – Safeguarding and Child Protection Policy (Florida)
- PD32 – Workplace Health and Safety Policy (Florida)
- PD67 – Student Death Protocol (Florida)
- PD20 – Student Protection Plan (Florida)

### 2. Purpose and Scope

- 2.1** This policy sets out how Holmes University Florida (HUF) defines and manages critical incidents. It applies to all staff, students and visitors of HUF.
- 2.2** The policy provides guidance and effective processes for HUF's response to, and management of, critical incidents when they occur, so that HUF meets its duty-of-care obligations by providing appropriate health-and-safety support to those affected and taking action to prevent recurrence. It is concerned with the institutional management of critical incidents; it does not give step-by-step instructions for dealing with a life-safety emergency. In any emergency involving immediate danger to life, call 911 first and then follow HUF's Emergency Management Plan.

### 3. Definitions

- 3.1** A critical incident is a traumatic event that causes, or is likely to cause, extreme physical and/or emotional distress to staff, students or visitors to HUF campuses, and which may be regarded as outside the normal range of experience of the people affected. Every critical incident is unique and is dealt with according to the needs of those affected. Examples include:
- Any fatality, serious injury or “near miss” likely to affect staff, students or visitors seriously;
  - Serious traffic accidents;
  - Acts or threats of violence by or towards students, staff, their family members or visitors;
  - Physical or sexual assault, or serious injury;

- The disappearance of a student for a prolonged period, or disruption to student accommodation and welfare arrangements;
  - Fire, explosion or bomb threat;
  - Chemical, radiation or bio-hazard spillage;
  - Hold-up, attempted robbery, or major theft or vandalism;
  - Infection or threatened infection with a serious communicable disease, including pandemic symptoms;
  - Incidents involving pain or abuse of children, or distressing sights, sounds or smells;
  - Storms or natural disasters; and
  - Acute physical or mental illness.
- 3.2** An emergency critical incident involves the possibility of immediate or imminent threat, or physical and/or emotional distress, to staff, students or visitors (including cyber-bullying, harassment or threats), and may require an immediate response.
- 3.3** A non-emergency critical incident is a critical incident that does not require an initial emergency response (for example, the development of a pandemic from a lower to a higher phase, where government instructions must be followed).

## **4. Policy Statement**

- 4.1** HUF recognizes that critical incidents can arise that have the potential to seriously affect the safety of staff, students and visitors and/or HUF's business continuity, and that effective planning, management and rehearsal are important elements in managing them successfully.
- 4.2** This policy and its related procedures are designed to ensure HUF:
- Meets its duty-of-care obligations in providing the highest possible standard of health and safety for staff, students, visitors and others working at or visiting HUF;
  - Is able to respond swiftly and effectively in the event of a critical incident;
  - Implements an integrated approach to the management of risks associated with critical incidents; and
  - Complies with relevant legislation and standards so that exposure of persons to health-and-safety risks is avoided or minimized and physical and psychological trauma are reduced.
- 4.3** This policy provides a framework for HUF's response to a critical incident during and immediately following the incident, and for its management of the longer-term consequences of such an incident. It also defines the roles and responsibilities of key staff in the management, coordination and communication of information about a critical incident, and in the recovery and post-incident review of the incident and its handling.
- 4.4** HUF ensures that students under the age of 18 are given appropriate information on who to contact in an emergency such as a critical incident. For the management of emergency situations for students under 18, refer to the Emergency Management Plan; where a critical incident disrupts welfare arrangements for a student under 18, refer to the Safeguarding and Child Protection Policy (PD15). The procedural arrangements in this policy address a range of critical incidents including emergencies requiring evacuation, lockdown, off-campus activities, and pandemic protocols.

## **5. Procedures - Reporting a Critical Incident**

- 5.1** Where a critical incident has occurred or is imminent, it must be reported, coordinated where possible by the President. The President must be notified immediately and given full details, including the exact location of the incident, the type of incident, and details of any person who

may be injured, in distress or at risk. The President can be contacted 24 hours a day, 7 days a week on the emergency number: +1 (412) 482-8506 Students may also report a critical incident by call and/or email to [florida@holmeseducation.group](mailto:florida@holmeseducation.group), or by visiting the on-campus Student Services desk (if it is open). In any life-threatening emergency, call 911 first.

## **6. Procedures - Responding to a Critical Incident**

- 6.1** The President will immediately assess the incident. If it is assessed as a critical incident, the President is responsible for the assessment and coordination of responses (co-opting other staff as necessary) and for informing the Senior Management. The President undertakes the following:
- Identify the persons affected by the critical incident;
  - Recommend a response, in terms of personnel and resources, to Senior Management on the basis of an assessment of needs and priorities;
  - Offer immediate assistance to persons involved in the incident;
  - Liaise with emergency services where appropriate and ensure they have the access they require;
  - Secure the premises and cordon off or close areas deemed unsafe;
  - Document the details of the incident;
  - Notify the relevant emergency contacts for the individuals involved and provide appropriate support - where an international (F-1) student dies or sustains serious injury, this support may extend to many tasks that would otherwise be dealt with by the family, and HUF reports as required through SEVIS;
  - Initiate pastoral-care services for individuals including victims and others affected;
  - Establish a quiet area for the use of victims and/or their families, protected from intrusion by anyone not immediately affected; and
  - Complete the Critical Incident Report Form and forward it to Senior Management within 24 hours of the incident.
- 6.2** The President is the only authorized spokesperson to speak to media representatives or make public statements regarding a critical incident, and provides guidance to staff on what information to give students and the public. Until that guidance is provided, staff make no comment and discourage other staff and students from commenting on the incident.
- 6.3** As a matter of good practice - and consistent with the emergency-notification and timely-warning expectations of the Clery Act, which would apply if HUF participates in Title IV - HUF issues emergency notifications on confirmation of a significant emergency or dangerous situation affecting the health or safety of the campus community.

## **7. Procedures - Follow-Up Action**

- 7.1** The President and the Senior Management assess the need for counselling, further information and debriefing sessions, and arrange resources to implement an ongoing plan of support. In implementing that plan, Senior Management ensures follow-up concerning the wellbeing of individuals involved, which may extend to accommodations or adjustments to student workload to allow recovery from injury or shock.
- 7.2** Senior Management ensures HUF complies with any additional legislative reporting requirements arising from the incident. Where a critical incident affects a student's attendance and/or course progress, it is recorded via the student management system and, for international (F-1) students, reported through SEVIS as required.
- 7.3** Where disruption to the welfare arrangements of a student under 18 occurs, HUF ensures that immediate welfare intervention and arrangements are made, follow-up actions are taken, the

student's parents or guardians are informed, and relevant agencies are contacted where needed - including, where a child-abuse or neglect concern arises, a report to the Florida Department of Children and Families under section 39.201, Florida Statutes (see PD15).

- 7.4** The President prepares a detailed report on the management of the incident for Senior Management, including recommendations for managing such incidents in future. The report is verified by the Director of Risk and Compliance. The President records the incident in the Critical Incident Register, including the remedial action undertaken.
- 7.5** The completed Critical Incident Report and the Critical Incident Register are tabled at the next Senior Management Group meeting. The SMG reviews and evaluates the response to the incident and the remedial action taken, and makes recommendations for any changes to policy and procedure. Changes, including to resources, are made as soon as practicable following the review.

## Document Control

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|-----------------------------------------|------------------------------------------------------------|
| <b>Prepared by</b>                      | Director of Risk and Compliance, Holmes University Florida |
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