	Critical Incident Policy
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1. Purpose

a. The aim of this policy is to ensure that the School London School of Management (the School) is ready to deal with critical incidents that threaten the safety and wellbeing of its students, staff and visitors as well as protecting the student experience and reputation.

b. The School's Critical Incident Policy lays out the procedures and actions to be taken in the event of a serious incident that involves students, staff members and visitors.

2. Definition of a critical incident

a. Critical incident: An event or situation that threatens serious damage to staff and student welfare or to the School environment or reputation. To constitute a critical incident this situation must require the implementation of special arrangements by the School as set out in this policy.

b. Critical incidents include, but are not limited to:

    i.   Serious injury or death on campus
    ii.   Serious crime, including high publicity violent crime including sexual assault, which affects staff or students and which cannot be handled by normal School policies
    iii.   Violence or threats of violence within the building
    iv.   Sudden or unexpected death or suicide of a work colleague, student or faculty
    v.   Natural disasters
    vi.   Hazards including fire, chemical exposure or structural collapse
    vii.   Threat to IT systems including shut down of systems
    viii.   Bomb threats or other suspected terrorist incidents

      ix.   Missing student

      x.   Severe weather events

      xi.   Pandemic illness

c.   Incident Management involves a focus on an initial response, liaison with many agencies and responding to the requirements of this affected by the critical incident.

d.   Business Continuity is concerned with maintaining internal operations in an organisation even in the middle of an emergency. There will be some crossover, but the two work streams have very different priorities and are designed to deliver results. Examples of business continuity priorities include liaising with insurers and loss adjusters and maintaining/returning IT networks and other core services.

3.   Categories of incidents

a.   Business continuity planning tries to identify potential major disruptive threats to the School's normal operations. Effective planning enables the School to develop the strategic and tactical capability to plan for and respond to interruptions to the normal running of the business.

b.   Major disruptive events can be broken down into five key areas. These are:

Lack of people:
- Pandemics (eg. Influenza, Covid-19), disease
- Adverse weather
- Other local major incidents preventing people from reaching SPJL

Buildings and infrastructure
- No access or impaired to rooms, corridors or buildings
- Failure of utilities (eg. due to fire, explosion, flood)
- Prohibition notice

Processes and technology
- IT or equipment failure
- Cyber security events
- Loss of or inability to access data
- Loss of communications tools, such as email, telephony and Internet connectivity
- Equipment and services required to teach

Financial
- Financial irregularities, insufficient income, fines, etc

Reputational
- UKVI, PREVENT, serious adverse Press, other major reputational issue
- Serious student incident

Whatever the major disruptive event, it is likely to be caused or affected by one or more of these five key areas identified above.

4.   Priorities for incident management and business continuity

a.   In the event of a major emergency or incident, the aim of the School's critical incident policy is to:
   i.   Protect life
   ii.   Secure the critical infrastructure and facilities
   iii.   Protect the student experience
   iv.   Resume normal business operations
   v.   Protect the School's reputation

5.   Responsibility in the event of a critical incident

a.   The Chief Operating Officer (COO) has ultimate responsibility in the event of an emergency. In the absence of the COO, the Dean will take responsibility. In their absence the following will be responsible:
   i.   Business Development Manager
   ii.   Director of Student Experience
   iii.   Registrar

b.   The above must:
   - Determine the facts (Information) – fact, not rumour / take time to get the facts
   - Assess the implications: it is essential to determine the full implications of disruption prior to taking any action i.e. what can't we do now that we could have if the incident hadn't arisen? Record the assets, resources, people and locations now not available.
   - Convene the appropriate level of incident management and business continuity team (see section 7 below).

c.   The incident management and business continuity team will
   - Agree coping strategies (Strategy) – these should already have been considered and documented for each critical activity but it is up to the response teams to ensure that sufficient resources are made available to those tasked with implementing them
   - Implement strategies (Track implementation) by providing required resources and support to the response teams.

6. Escalation of incidents

a. When an incident occurs, it may arise at a departmental level initially. All such incidents should still be referred to the COO or nominee (as outlined in 5 above) to ensure that it is being dealt with at the appropriate level.

7. Incident management and business continuity teams

a. Gold – Major incident team: Senior Management Team and key staff appropriate to the incident to deal with a major incident that affects multiple operations. Responsibilities include:

Dealing with the incident:

i. Evacuation of the campus if required
ii. Seeking emergency assistance – Police, Ambulance, Fire Brigade as required
iii. Ensuring the immediate health and safety of staff, students and responders
iv. Dealing with serious injury or death
v. Notifying relevant staff as necessary to assist with managing the incident such as the Registrar, IT Support Manager, Director of Student, PR and Media.
vi. Notifying security contractors if the incident is related to on-campus activities.
vii. Notifying the building management if the incident involves the building as well as the School campus.
viii. Making immediate contact with the family member of the staff/faculty/student involved if appropriate.
ix. Providing ongoing support to the individual and other affected people as required such as counselling and academic support.
x. If required, making arrangements for the concerned individual to return home, or any other place, considered suitable.
xi. Notification to the OfS if required under reportable events.
xii. Making contact with PR and Media agencies if required.
xiii. Coordinating with consulate or embassies, as required.
xii. Arranging for emergency travel/funds if required.

Business resumption:

i. Determining and obtaining new locations
ii. Setting up areas with IT and telecommunications systems
iii. Ensuring online teaching while face to face teaching is re-established.

b. The repercussions arising from a major incident may be much longer term than the incident itself; such issues may include the impact upon the School from unhelpful media and press, negative effects upon the student experience arising from site closure(s) and unbudgeted expenditure issues. In such a case it will be necessary to form specific operational groups to manage the longer-term issues arising from a major incident. The remit of such a working group will be determined and managed by the Gold group.

Silver – Heads of Service and Programme leaders responsible for dealing with a cross School-incident which involves one or more departments but which can be dealt with without reference to the Major Incident Team. Silver teams may also be required to deal with a business continuity issues, reporting to the Gold team. Responsibilities will be to recover activities and to manage workarounds and contingencies, taking account of situation and resource available

Bronze – Departmental operational teams: Departmental Operational team(s) dealing with incidents that affect only one department. Responsibilities will be to recover activities and to manage workarounds and contingencies, taking account of situation and resource available

8   Critical incident log

a.   A critical incident log should be maintained throughout the event by the COO or nominee. 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 to the OfS

v   After the event the appropriate Manager should provide a full report detailing the Critical Incident to the Chief Operating Officer.

vi   The appropriate critical incident team will hold 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 as part of a lessons learnt exercise.

vii   Determine what actions are required to ensure business continuity including maintaining a critical incident group at the appropriate level.

viii   The COO will ensure that the critical incident log and other analysis is reported to the Board of Directors as appropriate.

9   Emergency Contact Details

a.   The emergency contact details are set out in staff and Student Handbooks.

10.   Communication

a.   Communication with staff and students will be vital during a critical incident to ensure that they are safe. A means of communicating with staff will be established through a telephone tree. For students, communication through the website and directly through SMS will be established.

11.   Training

a.   Scenario testing and training is provided for members of staff who have nominated roles on the Gold and Silver Groups. This, together with specific information and instruction, supports these group members in managing a major event.

12   Emergency procedures

a.   The School has established emergency procedures which will provide a guide to dealing with incidents and business continuity. Every incident is different but having a written procedure helps ensure that situations can be managed more effectively if required. The following procedures have been developed:

    1   Incident affecting assessment
    2   Student death
    3   Staff death on campus
    4   Fire Evacuation
    5   Evacuation for security reasons
    6   Lockdown of the building

Emergency Procedure 1: Incident affecting teaching and/or assessment

Recovery of teaching

a   Following an incident where teaching is disrupted, a key priority is to ensure that teaching is recovered as soon as possible. Action to be taken will be decided by the Gold Group and the parameters are as follows:

   i   On the first day, students will be advised to go home if they have classes and asked to review emails or look at the website for further information at the end of the day;

   ii   Where restricted access to the building is likely to continue, if there are any rooms available they will be allocated to students on a priority basis. Level 4 to have priority at the beginning of the semester and Level 6 and masters students at the end of the semester.

   iii   If the situation is likely to be prolonged, consideration will be given to such measures as doubling up classes, reducing hours on campus and supplementing with online learning.

   iv   Where there is a major incident or national emergency (such as occasioned during the pandemic) the School may consider cancelling teaching for a period to allow staff to prepare for the appropriate scenario. This could entail actions including stopping teaching for up to a week and possibly closing the University according to the situation.

   v   Once building access and teaching has been fully restored, consideration should be given to putting on additional sessions for students where time was lost to ensure that learning outcomes can be met. Plans should be communicated to students and information provided as soon as it is available to ensure that they are aware of the efforts being made to provide their full programme of study.

Assessment

xiv. Where an incident has disrupted assessments, consideration should be given to ensuring that students are not disadvantaged:

   i   Where the incident occurs immediately prior to a major assignment deadline, the deadline should be extended for an appropriate period. Students who submitted early should also be allowed to re-submit to ensure no students are advantaged over others.

   ii   Where examinations are disrupted, consideration should be given to providing the examination paper or parts thereof as an in class test where rooms are available or for students to complete in their own time. An alternative assessment could also be set.

   iii   In all actions on assessment, Level 6 students should be prioritised to ensure that their graduation is not delayed. For example if only some examinations are to be cancelled, those for Level 6 should be given priority.

   iv   Students should not be required to request extensions or mitigation in these circumstances. Any actions should be approved in accordance with the Academic Regulations. Where necessary Emergency Regulations should be invoked.

Emergency Procedure 2: Student death

a.   In the event of a death on campus the COO or nominee must follow all steps set out below. Where it is not on campus, steps c onwards should be followed.

b.   In the event of a death of a student on campus, the COO or nominee, must contact the local police and/or ambulance immediately and direct to the site. An Official from the School should direct against anyone entering or leaving the area or touching the victim or any property until the police arrive.

c.   Where there is teaching onsite, consideration should be given to isolating the area or potentially sending home all other students and staff members not immediately required to deal with the incident.

d.   The COO should advise the Registrar, the Director of Student Experience and the Dean of the incident immediately after notifying the police. The following details should be provided:
   i.   student name;
   ii.   student number;
   iii.   programme and the duration the student attended the School;
   iv.   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.

e.   The Registrar should update the student information system to prevent any further correspondence.

f.   The Director of Student Experience will identify repatriation and insurance information for international students.

g.   Affected students and staff should receive counselling or other similar support as required.

h.   The COO/Director of Student Experience will liaise with the next of kin if appropriate.

i.   The Director of Student Experience will liaise with the relevant embassy or consulate for handling of repatriation and insurance information where required.

j.   A letter of condolence will be sent by the Dean to the next of kin

k.   A memorial service will be organised by for fellow students, staff and family to attend or attendance at the funeral as appropriate

l.   The relevant Registrar will check the student's programme progression in case the student may be eligible for a posthumous award or for a refund of fees paid in accordance with the Academic Regulations/Tuition Fee Policy. Any posthumous award will be submitted for consideration by the Academic Board.

m.   If the deceased is an enrolled international student the Registrar should also make a report should to the UKVI.

3. Emergency Procedure 3: Staff death on campus

a.   In the event of the death of a staff on campus, COO or nominee, must contact the local police and/or ambulance immediately and direct to the incident site. An Official from the School should direct against anyone entering or leaving the area or touching the victim or any property until the police arrive.

b.   The COO should advise the Dean, 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.   Where there is teaching onsite, consideration should be given to isolating the area or potentially sending home all other students and staff members not immediately required to deal with the incident.

d.   The COO 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.

j.   A memorial service will be organised by HR for fellow students, staff and family to attend or attendance at the funeral as appropriate.

Emergency procedure 3: Fire evacuation

On finding a fire

a.   It is essential all staff and students know the emergency procedures, escape routes, extinguisher positions and any special hazards of the building.

b.   Staff and students are given a Health and Safety induction on joining which includes Fire and Evacuation procedures. Fire action notices are posted above each fire call point with abbreviated instructions.

c.   If you start or discover a fire or see smoke:
   i.   Sound the fire alarm – break glass within the Fire Alarm Call point or revert to local arrangement if a fire alarm is not installed.
   ii.   Only if safe and trained to do – attack small fires using the appropriate appliances provided.
   iii.   If fire gets out of control or if your exit is threatened – leave the building and inform building security by dialling xxx.

On hearing an alarm

d.   If you hear an alarm:
   i.   If safe to do so, switch off all gas appliances and dangerous electrical items – compressed gas supplies such as oxygen, acetylene, compressed air, and hydrogen must be isolated at the cylinder.
   ii.   Close doors behind you – if safe to do so and does not hinder your evacuation, do not leave doors wedged open nor locked.
   iii.   Leave the building by the nearest available safe exit.
   iv.   Report to the assembly point – as indicated on the nearest Fire Action Notice.

Never tackle a fire unless it is safe, and you are trained to do so.
Do not take risks. Do not return to the building for any reason unless authorised to do so. Do not use lifts.

Reporting information

e.   If any person is aware of how the incident started or is aware of any person remaining in the building, they must report to the Fire and Rescue Service or School Security as soon as possible.

Fire checklist – security procedures

Action:
1.   Initiate evacuation of building if not done so already.
2.   Incident controller takes charge.
3.   Deploy Security to the scene.
4.   Inform Fire Service.
5.   Senior Fire Officer takes charge on arrival.
6.   Senior Fire Officer returns control to the School when satisfied it is safe.

Procedure 3: Re-occupation of a building

Following a fire alarm, authorisation to re-enter a building will only be given by specified members of School staff or a member of the Fire and Rescue Service.

Under no circumstance should any person re-enter a building unless authorised to do so.

- Where a fire alarm practice is being undertaken authorisation to re-enter a building will be given by authorised personnel.
- Where a fire alarm is activated through automatic detection or by means of a manual call point, authorisation to re-enter a building will be given by authorised personnel or a member of the Fire and Rescue Service who will investigate the cause of the activation.
- Upon activation of an alarm the School will go into full evacuation mode. Security will investigate the location of activation, during this time the monitoring station will be told to hold off calling the fire brigade. Only if a genuine alarm will the emergency services be called.
- All personnel conducting activation investigations will be suitably trained to ensure the safety of all persons.

Emergency Procedure 4: Evacuation procedure for security reasons

Scope

a.   This procedure covers all evacuations of buildings for security reasons including bomb alerts. The Fire and Evacuation Procedure is the starting point for all emergency evacuations and, as such any security evacuation will share substantial common elements with it. The content below therefore refers mainly to the areas where the Security Evacuation Procedure differs from the generic Fire and Evacuation Procedure.

b.   It should be noted that because of the potential consequences of any blast all evacuees can expect to be directed some considerable distance from the buildings during the course of an evacuation and, possibly, off site. It should further be noted that it may not be possible to use exits or exits routes ordinarily available.

c.   These procedures also hold for any other required evacuations (other than fire).

Evacuation Procedures

d.   The evacuation procedure will be undertaken directing individuals away from the suspected location of the device.
   i.   The COO (or deputising colleague) will liaise with Police on-site commanding officer.
   ii.   Fire Marshalls/Assembly Point Co-ordinators will direct all those evacuated to an off-site assembly point after congregating at local Assembly Point and as advised by the Police

Notification of a bomb threat from an individual by word of mouth, telephone or electronic means

e.   The person receiving the threat should stay calm and obtain as many details as possible especially the location of the bomb
f.   They should will inform Building Security on the Emergency Helpline number, ext unless the report came from Building Security
g.   The person receiving the threat should also inform the COO or (or deputising colleague) who will call the police if not done by the Building Security
h.   The COO and Fire Marshals will evacuate the premises via word of mouth (silent evacuation) allowing for bags, coats, keys etc to be collected.

Discovery of a suspicious package by a member of staff or student

i.   The person finding the package should put the package down carefully and clear the immediate area
j.   They should call the Building Security and report the presence of the suspicious package/case and its location.
k.   They should also inform the COO or (or deputising colleague) who will call the police if not done by the Building Security
l.   The COO will check in location if anyone owns the package/case. If an address can be seen contact supplier to check if a delivery is due that day.
m.   If the item cannot be accounted for and is still believed to be suspicious evacuate the premises via word of mouth / silent evacuation allowing for bags, coats, keys etc to be collected

Notification by the Policy

n.   Inform the COO or deputising colleague who will evacuate the premises via word of mouth / silent evacuation allowing for bags, coats, keys etc to be collected.

Re-Occupation of the Premises

o.   The premises will only be re-occupied following advice from the Police. The disruption to teaching and assessment procedure should be invoked if necessary

p.   Where the building is not fit for occupation, the main incident management and business continuity procedures should be invoked.

Emergency procedure 5: Building Lockdown

"A lockdown of a building or group of buildings is an emergency procedure intended to secure and protect occupants who are in the proximity of an immediate threat. This procedure is used when it may be more dangerous to evacuate a building than to stay inside. By controlling entry/exit and movement within a facility, emergency personnel are better able to contain and handle any threats".

The purpose of this lockdown procedure is therefore to minimise access or exit to or from rooms/buildings s to reduce the risk of injury or danger to staff, students or visitors. The lockdown procedure will help prevent people moving into danger areas and preventing or frustrating the attackers accessing a site (or part of), through physical measures in response to a threat, either external or internal.

This document is formulated based on the unique nature of our learning environment and in conjunction with guidance on Developing Dynamic Lockdown Procedures provided by the National Counter Terrorism Security office (NaCTSO). The procedures are developed to dynamically lockdown the School campuses in response to a fast moving incident such as a firearms or weapons attack, either directly at the site or in the vicinity.

These procedures are designed to cover a variety of scenarios including full or partial lockdown.

These Procedures are to be communicated to all operation staff with responsibilities to assist in specific scenarios. These include but not limited to, Fire Marshals and Security.

Action Counters Terrorism (ACT) Awareness training provided by MET police counter terrorism unit to key personnel should be offered to staff responsible for implementing these procedures.

Due to the fast moving nature of incidents that require lockdown it is important that all School staff should act quickly and effectively. Staff and students should in addition to the procedures outlined in this document, familiarise themselves with 'Stay Safe' principles (Run, Hide, Tell) which give some additional simple actions to consider during an incident and the information that armed officers may need in the event of a firearms and weapons attack. Full guidance is contained on the NaCTSO: **http://www.nactso.gov.uk/**.

Authority to Implement Lockdown procedure
A lockdown would be implemented when requested by the Police, the COO or members of the Senior Management Team in accordance with the Critical Incident Police

Incidents Requiring a Lockdown
These examples are not exhaustive or absolute but reflect the type of situation that may require a lockdown.
- Person(s) armed with a firearm or weapon on campus property
- Gunshots directed at or near the School campus
- Incidents involving dangerous person(s) that are adjacent to or within a short distance of the campus
- Intruders
- Hazardous chemicals spills, gas leaks, electrical conditions, or disasters close to the campus
- A reported incident / civil disturbance in the local community (with the potential to pose a risk to staff and students in the School).

Responsibilities

The COO will be responsible for overseeing the implementation of the lockdown in conjunction with the Building Management and the Emergency Services.

The Gold Team will oversee the lockdown where possible and appropriate.

All academic staff who have students in class or other staff who are in meetings or otherwise in control of students at the time of the lockdown become responsible for those students at that time. Staff who have visitors should behave in the same way. Staff should follow directions from line management, security, fire marshals and/or communication received to initiate lockdown.

Staff should be familiar with the procedures and ensure that staff are aware of them and the guidance on 'Run, Hide, Tell'.

Lockdown Procedures

Notification

A notification to occupants to lockdown may be sent by Fire Marshalls or First Aiders, SMS Alert, Blackboard, an email announcement or word of mouth.

Upon alert to Lockdown

It is essential for the safety of occupants and emergency responders that individuals comply with instructions provided by emergency personnel at all times.

If you are in a classroom, room or office:

- Stay there, secure the door and windows and wait further instructions (or escort from emergency personnel)
- If the door does not lock, barricade the door with tables and chairs
- If you are in a corridor, go into the closest office not already secured and lock or barricade the door and windows
- Close curtains or blinds where possible
- Stay away from windows and doors
- If known threat is from a bomb or incendiary device and there is insufficient time to run, hide behind a concrete pillar with 100 metres from the device if in open area or 30 metres in between buildings
- Stay low below window level and be quiet
- Mobile phones should be put on quiet or vibrate mode.
- Do not make non-essential calls
- Follow instructions from emergency personnel only
- If the fire alarm is activated, remain where you are and await further instructions from emergency personnel, unless you smell smoke or see fire in your immediate vicinity
- If possible, monitor the website
- Be aware of alternate exits if it becomes necessary to flee.
- If you are directed by police to leave your secured area, assists others in moving as quietly and as quickly as possible.

- If you are off-campus, do not return and follow instructions from campus notification system.

Do NOT do the following:
- open doors once it has been secured until you are officially advised "all clear" or are certain it is emergency personnel at the door
- use or hide in toilets
- travel down long corridors
- assemble in large open areas (e.g. refectories)
- respond to anyone at the door until an "all clear" message is received
- DO NOT call 999 unless you have immediate concerns for your safety, the safety of others, or feel you have critical information that will assist emergency personnel in the response
- sound the fire alarm in the building unless there is a fire. People may be placed in harm's way when they are attempting to evacuate the building

Actions when the police arrive

Follow instructions from police at all times to avoid harm and ensure the best possible response
- Keep your EMPTY hands raised and visible
- Remain calm and follow instructions
- Avoid pointing and yelling
- The first police officers to arrive will not respond to or aid those who may be injured. They will go directly to the intruder or source of the threat. Know that help for the injured is on the way
- The area is a crime scene. Police may secure all witnesses until identified for questioning.

Following the Lockdown

When the condition causing the lockdown has been eliminated, an "all clear – lockdown is over" announcement will be made as appropriate.

Once the Lockdown is over, you should:
- Cooperate with emergency personnel to assist in an orderly evacuation
- Proceed to the designated assembly area if advised
- The police may require individuals to remain available for questioning following a lockdown
- School security and emergency response staff may be present as you exit from buildings to provide additional information.