

Policy Title: Managing Student Behaviour / Dealing with Threatening or Inappropriate Behaviour Policy and Procedure

Policy Number: 3:0720MTIBSL

1. Organisational Scope

- 1.1 This policy applies to the Registered Training Organisations trading as: DNA Kingston Training (RTO Provider 6811) / Dental Nursing Australia (RTO Provider 52256)– referred to as 'DNA' for the purpose of this policy.
- 1.2 Related documents:
- Managing Threatening or Inappropriate Behaviour Flowchart (currently being developed)
 - Consequential Action Form (currently being developed)
 - Critical Incident Policy and Procedure
 - Critical Incident Form
 - Student Misconduct Policy and Procedure

2. Policy Purpose

The intent and objectives of this policy are to provide guidelines of what is to be considered threatening or inappropriate behaviour by students, staff or visitors, which undermines the College's capacity to provide a safe environment for students to reach their academic and personal potential. This includes any behaviour that limits opportunities for staff to work in a safe, satisfying and supportive environment.

Threatening or inappropriate behaviour requires a considered response that provides firm limits on unacceptable behaviour and addresses the safety of the whole community.

These procedures provide a framework for responsibly and professionally dealing with incidents of threatening or inappropriate behaviour and ensuring that all people involved are treated appropriately and with compassion and dignity.

These procedures provide information on the supports available within DNA to manage risk and prevent escalation of threatening or inappropriate behaviour.

These procedures outline the circumstances under which DNA Staff and WHS Team should be activated.

3. Policy Scope

This policy applies to all staff, visitors and all enrolled students at DNA. The policy supports staff in their decision-making process regarding acceptable student behaviour and required actions for any threatening or inappropriate behaviour encountered.

4. Policy Content

It is DNA's policy to provide a safe and comfortable environment for all staff and learners on campus. Any behaviour deemed threatening or inappropriate will not be tolerated.

Behaviours that are considered **threatening** to immediate safety include:

- an uttered, written or gestured threat to kill or harm another person
- an uttered, written or gestured threat to self harm or suicide
- an uttered or written threat to damage property
- any act of physical violence or property damage
- stalking (repeated, unwanted contact which can arouse apprehension and fear)
- bullying (repeated, unreasonable contact in the workplace)
- sexual harassment (unwelcome sexual conduct of any kind)

Behaviours that are considered to be **inappropriate** include:

All other behaviour, not previously mentioned above, that seems to imply, rather than directly state, danger to any person. Inappropriate behaviour violates the norms of social interactions in such a way that others feel at risk of imminent or future harm. Examples of inappropriate behaviour might include shouting, standing very close, revealing inappropriate knowledge of personal information, aggressive actions, or demanding unwarranted special attention or consideration.

Threatening or inappropriate behaviour may or may not be face to face.

Threatening or inappropriate behaviour can include emails, letters, and other similar mediums.

Safety is the priority

The motivation behind a threatener's conduct is irrelevant until the immediate safety of everyone involved is restored. Such consideration, however, may be relevant both to the longer term treatment or management of the person concerned, or during the follow-up to the incident.

Reasons for threatening or inappropriate behaviour

While there are many reasons why an individual may use threatening or inappropriate behaviour, some common motivations include:

- expressing emotion (usually anger or fear)
- appealing for help
- attempting to intimidate others and control their behaviour

Each of these motivations can be affected by many factors such as stress levels, attitudes about violence and coercion, mental state (particularly abnormal mental states such as that seen in those suffering psychosis or mood disorders), and intoxication or withdrawal from alcohol or illicit drugs.

5. Procedure for Implementation

Once the immediate risk to safety is controlled, threatening or inappropriate behaviour will be addressed through relevant DNA regulation, policy and procedure, eg:

- Student Misconduct Policy
- Student Discipline Processes
- Occupational Health and Safety
- Fairness Policies (Bullying, Sexual Harassment, Racial Discrimination)
- Student Complaints Policy
- Critical Incident Policy
- Relevant Workplace Agreements.

Who can manage threatening or inappropriate behaviour?

If any staff member believes it is safe and they are able to defuse the situation, they can manage threatening or inappropriate behaviour. If the person does not accept they need assistance and support, or their aggression and hostility escalates rather than diminishes, do not persist in attempting to manage their behaviour alone.

When is calling Security an appropriate response to threatening or inappropriate behaviour?

If staff feel unsafe in a situation, ask the person to leave. If they refuse to leave, staff and others in the room should leave.

Seek assistance by going to the nearest place with other people present.

At any time if staff feel unsafe or threatened they must seek assistance by calling another staff member to assist and call the Police.

When should Student Counselling be an option?

If concerning and inappropriate behaviour is observed (for example unusual eye contact, deteriorating dress or personal appearance, confused or irrational speech, agitation) and staff are concerned for a person's safety and wellbeing:

- If the person is a student -, contact the Student Support Manager, Course Coordinator or WHS Safety Officer (if required) .
- If the person is a member of staff, contact the CEO and/or College Director to assist in providing advice.
- If the person demonstrating concerning and inappropriate behaviour is a member of the public or a friend or relative of a student/staff member, call the Police.

When is additional Staff and Police an appropriate response to threatening or inappropriate behaviour?

Threatening or inappropriate behaviour may require an immediate response and then a follow up response to manage any ongoing safety issues - including making decisions about what further action should be taken.

The WHS team with additional staff can be activated when an incident occurs involving a person demonstrating threatening or inappropriate behaviour which generates ongoing concern about safety, this should be done immediately when any staff member or student feels unsafe or a serious threat to safety and wellbeing is apparent.

Who can call for the establishment of a Safety Team?

Any staff member in a position of authority (eg course coordinator, line manager, senior administration manager or department director) can identify the need for the WHS, additional staff and Police, by alerting the College Director.

Members of the Safety Team

The composition of the WHS Team is:

- Marj Cook- Belmont
- Virginia Flea- Bunbury
- Naomi Armstrong- Mandurah
- Marika Mackey- Mandurah / Belmont
- Sally Finlay- Belmont
- Bryan Pearce- Belmont

Responsibilities of the Safety Team

Responsibilities of the WHS team include:

1. Complete WHS Risk Assessment using the appropriate WHS management protocols for incidents involving threatening or inappropriate behaviour

2. Develop a Safety Plan specifically:

- Identify intervention options and management strategies
- Consult Director
- Develop action plan including tasks, roles and timing
- Coordinate and completing documentation
- Coordinate support and debriefing for those affected by the behaviour

3. Brief and liaise with other relevant services within and outside DNA called on to assist in the management of the threat /risk posed by the behaviour

4. Advise on appropriate communication strategies

5. Review any follow up action required

Responsibilities of College Director or Student Support Manager

Responsibilities of College Director or Student Support Manager threatening or inappropriate behaviour include:

1. Immediately activate the Staff and WHS team when behaviour occurs which is an actual or potential risk to safety and the person involved does not consent to or cooperate with intervention

2. Treat all parties fairly and offer assistance and support

3. Maintain comprehensive records of incidents of threatening or inappropriate behaviour

5. Initiate consequential action under relevant Regulations, Policies, Procedures and Agreements (Additional document)

6. Support training of key staff in responding to mental health risks and threatening or inappropriate behaviour.

Responsibilities

Responsibilities of Staff on site at the time in managing threatening or inappropriate behaviour include:

1. Respond to incidents or calls for assistance – College Director and other Staff
2. De-escalate and contain incidents
3. Call Police and other emergency services as necessary
4. Provide a proactive security presence where necessary to increase safety. Apply relevant security protocols
5. Consult and assist in implementing local safety plans for complex, persistent risk issues.

Responsibilities Counselling

Responsibilities Counselling in managing threatening or inappropriate behaviour include:

1. Provide confidential counselling to students - external
2. Provide secondary consultation to staff on appropriate action regarding a student when risk is first observed
3. Offer advice on issues of confidentiality, of 'duty of care' and 'duty to warn'
4. Offer advice regarding referrals to external service such as ambulance, Crisis, mental health services or forensic services and instigate referrals where appropriate
5. Offer crisis intervention and supportive counselling to students affected by distressing event or incident
6. Consult and assist in implementing local safety plans for complex, persistent risk issues
7. Provide training for students and staff regarding student mental health issues.

Responsibilities of Director and College Director

In managing threatening or inappropriate behaviour include:

1. Provide advice regarding disciplinary regulation and procedures
2. Consult and assist in implementing local safety plans for complex, persistent and ongoing risk issues.

Responsibilities of People and Culture

Responsibilities of People and Culture in managing threatening or inappropriate behaviour include:

1. Assess and provide advice on occupational health and safety issues
2. Offer private and confidential counselling for staff
3. Offer debriefing to staff when requested
4. Offer programs to support staff well being
5. Offer mental health awareness programs for staff
6. Provide advice regarding WH&S and staff disciplinary policies and procedures.

End of policy

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Kingston Training and Employment Pty Ltd Trading as 
Success Training Company Pty Ltd Trading as 
Policies and Procedures
Policy Title: Policy and Procedure Managing threatening and inappropriate behaviour
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Policy Renewal: Aug 2021
Responsibility: College Director

Record of updates and changes

Version No.	Issue Date	Nature of Amendment
Version 1.0	Aug 2018	Created to new standards
Version 2.0	Aug 2019	Updated drills and staff involved
Version 3.0	July 2020	Staff teams updated, policy template updated