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# Spain Emergency Incident Response Plan

Updated: May 2025

Spain Emergency Incident Response Plan

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# FIE: Foundation for International Education

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FIE is committed to a prompt and efficient response to any incident that would impact the operation of a programme.

**Health and Safety Committee** - overall mission is to foster a safe and healthy environment for all students and staff within FIE, and consists of representatives of FIE departments and teams. The H&S Committee is responsible for the annual review and enhancement of the Emergency Incident Response Plan.

**Emergency Incident Response Plan (EIRP)** - maps out preventative measures and action steps to be followed in the event of an emergency. The EIRP is carefully reviewed on an ongoing basis by the Health and Safety Committee.

**Emergency Incident Review Group (EIRG)** - responsible for the effective delivery of the EIRP and convened by the EIRG Chair in the event of an emergency. The EIRG is headed by the EIRG Chair and representatives from the emergency communication tree is as follows:

# EIRG Chair $\rightarrow$ Senior Leadership Representative $\rightarrow$ Spain Team Representatives

The EIRG is also centrally responsible for communication strategy following a Major Critical Incident (MCI). In the event of a MCI or public health crisis, if the EIRG Chair or designate is unavailable to fulfil their responsibilities, the transfer of stated responsibilities will follow the emergency communication tree as established above.

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# 24/7 EMERGENCY CONTACT NUMBERS

- Madrid: +34 695 038 096
- Barcelona: +34 664 039 265
- London: +44 (0) 207 808 0131 or +44 (0) 207 589 0728

In case of an emergency, MCI or otherwise, students are instructed to call FIE's emergency contact number. The contact number is maintained 24/7 by the Emergency Facilities Support Team at Metrogate House. In case of an MCI, when a call is received Reception informs the chair of the EIRG or the next in line in his/her absence.

Handbooks and documents related to FIE operations are reviewed regularly to ensure they are compliant with and complimentary to the EIRP protocols and procedures.

The Spain Emergency Incident Response Plan and accompanying Major Critical Incident Internal Protocol are reviewed during a new employee's Human Resources induction at FIE.

As part of the annual review of the EIRP, it is the responsibility of each team's representative on the Health and Safety Committee to ensure all staff in their team or department understands their role and responsibilities in the event the EIRP is invoked.

# **Communication Responsibility**

There is one primary source of communication in all cases of a MCI. Communication with different constituents will be instigated, as necessary and as outlined below:

- Information communicated to Programme Administrators at partner universities and the Media will be managed by Senior Leadership and in their absence the EIRG Chair and then (see emergency communication tree above).
- Visiting Faculty and Site Staff will be contacted by the local team and then (see emergency communication tree above).
- Placement Site Supervisors will be contacted by the local team.
- Students will be contacted and updated by the local team.
- FIE's Website, social media, and SMS messaging will be utilised accordingly. This will be the responsibility of the Marketing Team in consultation with the EIRG.
- Programme Administrators at partner universities for programmes taking place in the next calendar phase will be the responsibility of US Institutional Relations Team under the direction of the EIRG Chair.

# **Unexplained Absence of a Student During a Programme**

# **Preventative Measures**

- □ All students are required at the time of admittance to supply FIE with a digital passport style photo
- Student files contain all necessary medical records and home/emergency contact numbers
- □ Students are informed prior to arrival that they are expected to act responsibly and have a working cell phone for the duration of their programme. Student cell phone numbers will be registered no later than the first week of classes.

# Action if required

If a student has not been seen, without explanation, for a period of 24 hours, staff will:

- 1. Consult the Student Travel Form for information of travel plans
- 2. Contact student's friends and flat mates to establish if they know of the student's whereabouts
- 3. Inform the visiting faculty if applicable
- 4. Contact all the student's instructors and (if interning) the placement site supervisor to establish if they know of student's whereabouts
- 5. Contact last known address (if student is travelling)
- 6. Contact police with description, photograph and last known whereabouts

If the missing student is found safe and sound, the incident is closed. If the student is not located or is discovered to be injured, see responses 2 or 3.

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures

# Injury to, or, Illness of a Student

An FIE point person or persons will be designated to co-ordinate information and communication to FIE staff, faculty (where appropriate), internship site supervisors (where appropriate), visiting faculty and the sending institution.

Should a student become ill during a public health crisis (e.g. pandemic, epidemic), the "Declaration of a Public Health Crisis" programme response will run in tangent with this individual response.

#### **Preventative Measures**

- □ All FIE programme students are required to be covered by some form of medical insurance, either from their home institution or through FIE's travel insurance policy
- During orientation students are advised about personal safety issues, such as living in a large city, security in the residences, avoiding travelling alone at night, recommended methods of travel, handling of electrical appliances in their residences, adjusting to Spain traffic flow, dangers of excessive alcohol consumption, the laws relating to drug use, prompt reporting of medical problems and the availability of confidential counselling services
- All students are required to submit a Health and Wellbeing Questionnaire to FIE before the programme begins, outlining their medical history and detailing any medications required. Also, students are advised in the pre-departure communication to ensure that they bring sufficient medication for the duration of the programme and a copy of all prescriptions
- Prior to the programme start, students are provided with any information related to recent and ongoing public health concerns. This includes possible programme impact and operational changes, risk mitigation measures, existing resources, additional requirements for programme participation, and student responsibilities.
- Once in Spain students are given the emergency contact information for FIE, the emergency services and other useful numbers. Students are encouraged to save important numbers in their mobile phone.
- □ Students are provided with FIE travel insurance information. If applicable, students should also provide FIE with their personal health insurance details (e.g. Blue Cross/Blue Shield numbers).
- □ There is always a Residence Life Supervisor on call.

Injury To or Illness

Denotes preventative measures or procedures

Denotes action taken
 × Denotes post or follow up measures or procedures

of a Student Con't

# Action if required

If a student contacts FIE with an illness or an injury in Spain:

- Contact the emergency services or arrange for a student to see a doctor as appropriate
- If a student is hospitalised, send a staff member to the hospital immediately
- If a student is hospitalised, advise the student to contact friends/family and offer to do so on their behalf

If a student contacts FIE from outside Spain with an injury or illness, staff will:

- Establish the nature of the illness or injury
- If appropriate, travel to see the student
- If necessary, assist the student's return to Spain

In any of the above circumstances:

- × If a student needs to return to the US for medical treatment, staff will contact the airline and assist the student in contacting their US doctor
- FIE's travel insurance company will be notified and the student's policy (where applicable) will be activated
- × If appropriate, staff will notify the faculty (including visiting faculty) and placement site supervisors that the student will be absent from class and/or internship
- If appropriate, staff will notify the local public health authority and cooperate fully with their guidance and directives

Denotes preventative measures or procedures

- Denotes action taken
- × Denotes post or follow up measures or procedures

# **Death of a Student**

Should the death of a student occur during a public health crisis (e.g. pandemic, epidemic), the "Declaration of a Public Health Crisis" programme response will run in tangent with this individual response.

# Action required

Designated staff will:

- Begin keeping a detailed Incident Report Form of information, communication, and actions concerning the incident. They will update this log throughout the crisis.
- Notify FIE directors, managers, faculty, site supervisor (where appropriate) and relevant staff (where necessary)
- Notify relevant personnel at student's home university
- Assist in the formal identification of the body
- Notify US (or relevant) Embassy, complete forms for an interim death certificate and request names of funeral homes dealing with international repatriation
- Designate a contact staff member for liaison with appropriate authorities in Spain and supervise the collection and storage of the deceased's effects
- Offer assistance to any family member(s) in making arrangements to come to Spain if they so desire. Meet family member(s) at airport, arrange accommodation and local assistance
- Assist with repatriation of body
- Observe bereavement protocol e.g. letters of condolence to family members
- × Arrange support network for staff and faculty members involved in responding to the student death through on-site professional counselling resources
- × Assess counselling requirements of the deceased's friends and peers
- × Notify the local public health authority (if applicable)

#### Managing the students who remain

Staff will:

- Ideally, notify all students as soon as possible about the death
- Make arrangements for individual counselling if required
- Organize a group session with a professional if required
- Provide students with the names and contact details for a number of counsellors for those students who may prefer to speak in confidence and one-on-one
- Contact all teaching, Residence Life staff and placement site supervisors so they are aware of the situation and can manage sympathetically with the students
- Keep the students informed as much as possible
- Remove student name and email address from address book and database to prevent receiving routine email
- Organize group debriefing meeting(s) to assess individual requirements for counselling
- Follow-up meeting(s) to discuss what has been learned in order to improve emergency procedures in future
- Arrange a memorial service and:
  - o Identify someone to perform a non-denominational service
  - Prepare a memorial service program
  - Purchase a memorial book to sign
  - Ask for input from students, faculty, and staff who may want to speak

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures



# **Major Critical Incident in Spain**

The importance of clear, concise, accurate and regular communication during times of crisis and emergency cannot be overestimated. All FIE communiqués and bulletins to students, parents, faculty, placement site supervisors, programme administrators and the media will be coordinated by the EIRG Chair or his/her designate. The language required to communicate with a population during crisis/emergency is distinct and must always be considered, employing a balance of authority and calm. This is more easily attainable when the source is limited.

Should a Public Health Crisis be declared in Spain, the "Declaration of a Public Health Crisis in Spain" programme response will be invoked.

# **Preventative Measures**

- For US Citizens. Prior to arrival and on arrival students are expected to register with the US Department of State https://step.state.gov Travel registration is a free service provided by the U.S. Government to U.S. citizens who are traveling to, or living in, a foreign country. Registration allows students and visiting faculty to record information about travel abroad that the Department of State can use to assist in the case of an emergency. Americans residing abroad can also get routine information from the nearest U.S. embassy or consulate
- □ Students are informed prior to arrival that they are expected to act responsibly and are encouraged have a Spain cell phone for the duration of their programme. Student cell phone numbers will be registered no later than the first week of classes.
- On arrival students are expected to act responsibly; this expectation is reiterated throughout orientation and includes but is not limited to:
  - Completing and submitting Travel Forms when intending to travel, detailing travel plans and contact information;
  - Updating FIE staff with changes to their mobile number and/or email address;
  - Checking their email accounts regularly for updates and information, and responding promptly with requested information.
- □ Following arrival, students receive an email reminder regarding personal health and safety precautions, which includes:
  - A reminder for US Citizens to register with the Smart Traveler Enrolment Program (STEP) through the US Department of State;
  - Information on how to locate local US embassy and consulate contact information if they plan to travel outside Spain;
  - The suggestion to consult travel advisory information published by the US Department of State and/or Spain Government Travel Advice, along with information on how to access these messages;
  - Links to FIE's Emergency Incident Response Plan;
  - FIE's emergency phone numbers.

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# Major Critical Incident in Spain Con't

- All relevant emergency and transport information services are made known to students which provide current advisories and advice to US nationals, other nationals and local inhabitants about acts of terrorism and accidents in Spain. Students are expected to use these services accordingly.
- Students will be reassured that everything is being done to assure their security and wellbeing, and FIE will request their utmost cooperation in responding to the crisis
- □ FIE maintains current contact information of US programme administration and crisis management structures

# Action required

In the event of a Major Critical Incident or MCI (e.g. underground train crash, fire in department store, etc.) or terrorist activity in Spain, staff will:

- Maintain continuous contact with emergency services and transport information via media sources. We will only take our information and advice about critical incidences from a number of official sources including:
  - Transport for Madrid <u>https://www.crtm.es/</u>
  - o Transport for Barcelona https://www.tmb.cat/es/transporte-barcelona
  - o US Embassy in Madrid <u>https://es.usembassy.gov/</u>
  - US Consulate in Barcelona <u>https://es.usembassy.gov/barcelona/</u>
  - Spanish national police <u>https://www.policia.es/ es/index.php#</u>
    - Madrid local police <u>https://www.madrid.es/portal/site/munimadrid</u>
    - Barcelona local police <u>https://ajuntament.barcelona.cat/guardiaurbana/en/</u>
  - Ministry of Health, Public Health Alerts
     <u>https://www.sanidad.gob.es/en/areas/alertasEmergenciasSanitarias/alertasActuales/home.ht</u>
     m
  - World Health Organization <u>http://www.who.int/en/</u>
- Contact all students, faculty, and staff, visiting faculty and placement site supervisors to establish that they are safe and not involved in the incident. An immediate attempt to verify the health and safety of all students on all programmes will be initiated and a master register of students will be created:
  - The local team will instigate and maintain the master register of students and communicate accordingly to all departments
  - If the MCI is during office hours/weekday the local team will gather information from all its available sources to ascertain the whereabouts and safety of placement students
  - The local team will gather information from visiting faculty and FIE faculty in order to ascertain the whereabouts and safety of all study students and communicate all information to the master register in the Student Life Office
- Students are informed that they are expected to call home to reassure family/friends
- Contact US campus coordinators to confirm status of events

Additional action in the event of terrorist activity, staff will as necessary:

- Liaise with the American Embassy, the embassies representing all other FIE students and Spanish authorities on suggested precautions
- Issue updated security advice to all students and visiting faculty
- Review programme status with US campus coordinators and visiting faculty
- Set up a student counselling centre to include trained student/peer counsellors
  - Denotes preventative measures or procedures
  - Denotes action taken
  - × Denotes post or follow up measures or procedures

# Major Critical Incident in Spain Con't

- Advise and brief FIE staff, visiting faculty and FIE faculty to discuss the crisis in the classroom. The familiar and potentially "calming" presence of visiting faculty from "home" institutions should be fully utilised, where possible
- Set up an Information Centre to control rumours and prevent anxiety
- Contact Spanish support services assisting with US and other citizens abroad
- Maintain regular contact with other US student programmes in Spain
- Refer to the students' travel forms if submitted
- × The EIRG will convene, representing students, parents (when possible), faculty, emergency agencies and administration to evaluate the effectiveness of the procedure and amend it accordingly.

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures

# **Major Critical Incident in Europe**

The EIRG will convene and decide whether to activate the following procedure based on the location of the critical incident and the likelihood of students being affected by it. In the event of a Major Critical Incident or MCI (e.g. underground train crash, fire in department store, etc.) or terrorist activity in Europe, staff will:

- Contact all students, faculty, and staff, and visiting faculty to establish that they are safe and not involved in the incident. An immediate attempt to verify the health and safety of all students on all programmes will be initiated and a master register of students will be created:
  - The local team will instigate and maintain the master register of students and communicate accordingly to all departments
  - If the MCI is during office hours/weekday the local team will gather information from all its available sources to ascertain the whereabouts and safety of placement students and communicate all information to the master register
  - The local team will gather information from visiting faculty and FIE faculty in order to ascertain the whereabouts and safety of all study students and communicate all information to the master register
  - Students are informed that they are expected to call home to reassure family/friends
- Contact US campus coordinators to confirm status of events
- If individual students are injured, the "Injury To or Illness of a Student" response should be invoked.
- × Should a Public Health Crisis be declared within Europe, the "Declaration of a Public Health Crisis in Europe" programme response will be invoked.

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures

# Arrest of a Student

# **Preventative measures**

In FIE's pre-departure information and at orientation in Spain, students are advised that they are subject to local laws and that FIE, American consular officials and officials from other consulates, can do very little in the event of the law being broken. A specific warning is given out about penalties for possession of, or trafficking in drugs.

# Action if required

Staff will:

- Begin writing a detailed account of the incident in the Incident Report Form detailing information concerning the incident, individuals whom have been contacted, and actions that have been taken by staff. This log will be updated until the crisis is resolved.
- Visit the student wherever they are being held, reassure the student, advise them to obtain the services of a lawyer, and offer to help in making these arrangements
- Assist the student as necessary to arrange legal representation with the American Embassy or other embassy as necessary
- Assist in contacting the American Embassy or other embassy as necessary, who will make contact with the student's friends and family if requested to do so
- Co-operate with authorities in providing information as requested
- Inform local teaching staff, administrators and partner organizations that the student will be absent, but do not give details.
- × Assist the student in receiving any necessary counselling

Denotes preventative measures or procedures

- Denotes action taken
- × Denotes post or follow up measures or procedures

# Death of A Student's Relative or Friend

# Action required

- Notify FIE's local team and relevant staff (where appropriate)
- Notify faculty of any related absences of the student
- Assess student's counselling requirements
- Provide pastoral care and access to counsellors
- Assist student in making travel arrangements if flying home/attending funeral, if necessary accompany student to airport
- Designate a contact staff member to liaise with family and US administrators
- Observe bereavement protocol, e.g. letter of condolence to student to be written by a representative from Senior Leadership or his/her designate
- × In case of non-completion of programme, the student's fellow programme students may be briefed if and when necessary

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures

# **Dangers to Public Health**

# Action required

In the event of health warnings of contaminated food, infected water supply etc., staff will:

- Immediately contact all students with up to date information and advise all students
- Inform US campus co-coordinators, visiting staff and faculty, FIE faculty/staff and placement site supervisors of the status of events

#### Action required

In the event of health warnings related to an isolated incident of illness (i.e. confirmed meningitis case) etc., staff will:

- Invoke the "Injury or Illness to a Student" response to support any students who display symptoms or are confirmed cases
- Immediately contact all students with up to date information and advise all students
- Inform US campus co-coordinators, visiting staff and faculty, FIE faculty/staff and placement site supervisors of the status of events

# Action required

In the event of health warnings of several incidents of related illness within the FIE, local, or national communities, staff will:

- Invoke the "Injury or Illness to a Student" response to support any students who display symptoms or are confirmed cases
- Immediately contact all students with up to date information and advise all students
- Inform US campus co-coordinators, visiting staff and faculty, FIE faculty/staff and placement site supervisors of the status of events
- Convene the EIRG and continuously monitor the situation, providing updates to all stakeholders. We will only take our information and advice about critical incidences from a number of official sources including:
  - Ministry of Health, Public Health Alerts <u>https://www.sanidad.gob.es/en/areas/alertasEmergenciasSanitarias/alertas</u> <u>Actuale s/home.htm</u>
  - World Health Organization <u>http://www.who.int/en/</u>
- × The EIRG will convene, representing students, parents (when possible), faculty, emergency agencies and administration to evaluate the effectiveness of the procedure and amend it accordingly.
- × The EIRG will assess if any risk or danger exists for participants in upcoming programmes and implement preventative measures and operational changes as deemed appropriate.
- × Communications including any changes to programme delivery, identified local or national laws or guidance, preventative measures, and updated response with Programme Administrators at partner universities for programmes taking place in the next calendar phase will be the responsibility of US Institutional Relations Team under the direction of the EIRG Chair.
  - Denotes preventative measures or procedures
  - Denotes action taken
  - × Denotes post or follow up measures or procedures

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# **Declaration of Public Health Crisis in Spain**

The declaration of a local or national public health crisis is considered an MCI, and therefore preventative measures, active response, communications, and support to students are similar to FIE's response to a MCI. The "Major Critical Incident in Spain" response should be consulted for additional information and guidance.

Should a student become ill during a public health crisis (e.g. pandemic, epidemic), the "Injury to, or, Illness of a Student" individual response will run in tangent with this programme response.

All FIE communiqués and bulletins to students, parents, faculty, placement site supervisors, programme administrators, and the media will be coordinated by the EIRG Chair or his/her designate.

In the event of an on-going crisis, an incident-specific Task Force may be created, at the discretion of Senior Leadership. If formed, the Task Force will be responsible for:

- Establishing a communication tree (if different from the EIRG communication tree) and method of transfer of responsibilities in the event a member of the Task Force falls ill;
- Updating existing FIE documents, policies, and procedures to reflect any operational changes, and creating new documents as needed;
- Updating signage throughout FIE facilities as appropriate;
- Communicating any changes or alternations to programme delivery to the stakeholders;
- Ensuring FIE staff and faculty are informed of any changes and trained appropriately in the required emergency response;
- Reviewing the response upon the conclusion of the public health crisis, and recommending changes to FIE operations as appropriate.

#### **Preventative measures**

- Prior to arrival students, partner coordinators, and visiting faculty and staff are made aware of the public health crisis, any related local and national laws, policies, and guidance, and any changes to FIE's programme delivery including academic delivery, housing and facilities provisions, medical and counselling support, and the cancellation policy.
- □ Prior to arrival FIE staff will assist students in preparing for their time in Spain by:
  - Providing an update packing list (if applicable) to ensure full compliance with Spanish laws and FIE policies (e.g. masks, thermometer, hand sanitizer);
  - Making students aware of any additional FIE rules, regulations, policies, procedures, or directives related to the crisis;
  - o Clearly identifying information related to the crisis in pre-arrival email communications;
  - Being available to conduct related to health and safety and the current situation in Spain for students and partner coordinators.
- □ Students are informed prior to arrival that they are expected to act responsibly with regards to their personal and other's health and well-being.
- Students are encouraged have a Spanish cell phone and mobile internet access (data) for the duration of their programme. Student cell phone numbers will be registered no later than the first week of classes.
  - Denotes preventative measures or procedures
  - Denotes action taken
  - × Denotes post or follow up measures or procedures

- On arrival students are expected adopt a community minded focus and take responsibility for their health; this expectation is reiterated throughout orientation and includes but is not limited to:
  - Committing to FIE policies regarding health and safety and preventative measures (e.g. wearing masks, utilising hand sanitizing stations, etc);
  - Following all Spanish government requirements and FIE directives related to post-travel precautions (e.g. self-isolation, quarantine, restricted movement);
  - Engaging with any Spanish government or Ministry of Health measures to aid in community response and support (e.g. contact tracing procedures);
  - Communicating any concerns regarding their personal health (i.e. symptoms) to FIE staff immediately;
  - Checking their email accounts regularly for updates and information, and responding promptly with requested information.
- □ Health and safety information communicated to students after their arrival will be updated to include information specifically related to the current crisis.

# Action if required

Should a student become ill during a public health crisis (e.g. pandemic, epidemic), in addition to the response detailed in the "Injury To or Illness of a Student" section, staff will:

- Ensure all health and safety precautions required or advised by the local and national authorities is being adhered to (e.g. self-isolation, quarantine, track and tracing measures);
- Contact the local and public health authorities as required;
- Assist in track and tracing measures if applicable, and notify impacted members of the FIE community (e.g. other students, faculty and staff, placement site supervisors, service providers);
- Notify the home campus and provide updates as permitted by privacy laws;
- Communicate information to Programme Administrators at partner universities and the Media as directed by Senior Leadership and in their absence the EIRG Chair and then (see emergency communications tree above).
- × Assist the student in receiving any necessary counselling
- × Convene the EIRG or Task Force to review the incident and make recommendations for policy updates as appropriate.

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures

# **Declaration of Public Health Crisis in Europe**

The declaration of a local or national public health crisis is considered an MCI, and therefore preventative measures, active response, communications, and support to students are similar to FIE's response to a MCI. The "Major Critical Incident in Europe" response should be consulted for additional information and guidance.

Should a student become ill during a public health crisis (e.g. pandemic, epidemic), the "Injury to, or, Illness of a Student" individual response will run in tangent with this programme response.

# Action required

In the event of health warnings of several incidents of related illness within Europe, staff will:

- Invoke the "Injury or Illness to a Student" response to support any students who display symptoms or are confirmed cases
- Immediately contact all students with up to date information and advise all students
- Inform US campus co-coordinators, visiting staff and faculty, FIE faculty/staff and placement site supervisors of the status of events
- Convene the EIRG and continuously monitor the situation, providing updates to all stakeholders. We
  will only take our information and advice about critical incidences from a number of official sources
  including:

  - World Health Organization <u>http://www.who.int/en/</u>

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures

# **US Travel Advisory**

#### **Preventative Measures**

- Staff will make known resources which provide up to the minute advice about travel, including the US Department of State Travel Advisories <u>https://travel.state.gov/content/travel/en/international-travel.html</u>
- Staff will make known resources which provide up to the minute advice about public health, including the US Centers for Disease Control and Prevention <u>https://www.cdc.gov/</u> and World Health Organization <u>www.who.int</u>

#### Action required

In the event of the US Department of State advising US citizens either not to travel to Spain or to leave Spain if already there, staff will:

- If the programme has not started, postpone or cancel start of programme with full refunds
- Contact US visiting faculty and US campus co-coordinators to appraise them of FIE's intention
- If the programme has started, suspend the programme and assist the students in making arrangements to return home
- Provide pro-rata refund of recoverable programme costs

In response to US Department of State advising US citizens to either not travel to Spain or to leave Spain if already here, staff will support students by providing timely information and advice. The right to invoke the above procedure remains at the discretion of the EIRG in consultation with FIE's Senior Leadership.

- Denotes preventative measures or procedures
- Denotes action taken
- × Denotes post or follow up measures or procedures

# Appendix 1.) FIE Staff – Leadership Responsibility – Excursions

# Introduction

This document has been produced to provide practical information for FIE staff leading and accompanying Excursions.

This includes advice on planning, supervision, on-going risk assessment and emergency procedures.

Of course, rules and procedures, however numerous or comprehensive, are unlikely to cover every eventuality. When confronted with a situation not covered by this document, both staff and students should apply common sense.

#### Staff Duty of Care

All accompanying staff have a duty of care to the students participating on Excursions. They must provide welfare, support and supervision to all participants throughout the excursion/tour.

#### **Group Leader**

The group leader has overall responsibility for the supervision and conduct of the excursion with particular regard to the health and safety of the group.

#### Supervision

This section aims to give more practical advice on supervision "in the field".

#### Responsibility

The group leader is responsible overall for the group at all times. It is good practice for the group leader to:

- Ensure that all staff and excursion participants are aware of the expected standards of behaviour
- Exercise appropriate control of the group and maintain agreed standards of behaviour
- Be aware of participants with any special educational/medical needs or disabilities
- Carry a list/register of all group members with contact details
- Regularly check that the entire group is present
- Have a clear plan of the activity to be undertaken and its objectives
- Have the means to contact the group leader/other staff if needing help
- Have prior knowledge of the excursion
- Ensure the ratio of staff to participants is appropriate for the needs of the group
- Clearly understand the emergency procedures and be able to carry them out
- Assign an FIE Office emergency contact
- Consider stopping the excursion if the risk to the health or safety of the participants is unacceptable, and have in place procedures for such an eventuality
- Ensure that group staff have details of the FIE Office emergency contact
- Ensure that staff and the FIE Office emergency contact have a copy of the emergency procedures and know how to activate them
- Ensure that staff have the details of participants' additional support or medical needs which will be necessary for them to carry out their tasks effectively

Each participant should:

- Know who the group leader/staff are and how to contact them
- Have been given clear, understandable and appropriate instructions
- Participate in all organised activities/events
- Alert the group leader/staff if someone is missing or in difficulties
- Have a meeting place to return to if separated
- Understand and accept the expected standards of behaviour

#### Head counts

Whatever the length and nature of the excursion, regular head counting of participants should take place, particularly where there are opportunities for participants to become separated. Staff should carry a list of participants involved in the excursion at all times, preferably on their person. The group leader/staff should establish rendezvous points and tell participants what to do if they become separated from the group.

#### **Remote supervision**

The aim of excursions for some participants may be to encourage independence and some of the time on excursions such as trips abroad and fieldwork may be unsupervised. However, the group leader remains responsible for participants even when not in direct contact with them.

#### General

Participants who are involved in an excursion's planning and organisation, and who are well prepared, will make more informed decisions and will be less at risk. Providing information and guidance to participants is an important part of preparing for an excursion. Participants should clearly understand what is expected of them and what the excursion will entail. Participants must understand what standard of behaviour is expected of them and why rules must be followed. Participants should also be told about any potential dangers and how they should act to ensure their own safety and that of others.

#### **Participation & Behaviour**

Participants whose behaviour is such that the group leader/staff are concerned for their safety, or for that of others, should be withdrawn from the activity. On residential visits the group leader should consider whether such participants should be sent home early and liaise with the FIE home Office.

#### Information to participants

The group leader/staff should decide how information is provided, but must ensure that the participants understand key safety information. Participants should understand:

- The aims and objectives of the excursion/activity
- The background information about the place to be visited
- Basic foreign words where appropriate
- Relevant foreign culture and customs
- How to avoid specific dangers and why they should follow rules
- Why safety precautions are in place
- What standard of behaviour is expected from participants
- Who is responsible for the group
- What not to bring back either within Spain or from abroad, such as drugs, knives etc.
- What to do if approached by anyone from outside the group
- Rendezvous procedures
- What to do if separated from the group
- Emergency procedures

#### **Transport and participants**

Participants using transport on an excursion should be made aware of basic safety rules including:

- Arrive on time and wait for the transport in a safe place
- Wear your seatbelt and stay seated whilst travelling
- Bags must not block aisles or cause obstructions
- Never leave a vehicle without the permission of the group leader
- Never distract or disturb the driver or impede the driver's vision
- After leaving the vehicle, always wait for it to move off before crossing the road
- If you feel unwell tell the group leader/staff

The group leader/staff should ensure that participants know what to do if they miss the scheduled departure time.

#### Participants with additional support and medical needs

Every effort should be made to include participants with additional support or medical needs in excursions, whilst maintaining the safety of everyone in the group. Special attention should be given to appropriate supervision ratios and additional safety measures may need to be addressed at the planning stage.

Arrangements for taking medication and ensuring sufficient supplies for residential visits may be required, including safekeeping. All leaders supervising visits should be aware of participants' medical needs and any medical emergency procedures.

Enquiries should be made at an early stage about access and facilities for securing wheelchairs on transport etc. If ramps are not going to be available in certain places, the organisers may wish to arrange to take portable ramps with them. The group leader should at an early stage assess whether manual handling skills will be needed and, if so, whether training should be sought.

All leaders supervising the excursion should talk through any concerns they may have about their ability to support the participant. Extra help should be requested if necessary, e.g. a care assistant.

The group leader should check that the insurance policy covers staff and participants with pre-existing medical needs.

#### **Excursions Abroad**

#### Planning and preparation

It is good practice that an exploratory visit to the location should be made, wherever possible. If this cannot be done, the group leader/staff should gather as much information as possible on the area to be visited/facilities from:

- The provider
- Other establishments which have used the facilities/been to the area
- The local authority/establishments in the area to be visited
- National travel offices in Spain
- Embassies/consulates
- Travel agents/tour operators
- Internet, books and magazines

#### Preparing participants for visits abroad

Factors to consider include:

- Language particularly common phrases
- Culture e.g. body language, rules and regulations of behaviour, dress codes, local customs, attitudes to gender etc.
- Drugs, alcohol usage
- Food and drink group members should be warned of the dangers of drinking tap water in certain countries. In some countries it is safer to drink bottled water, and care needs to be taken with raw vegetables, salads and unpeeled fruit, raw shellfish, underdone meat or fish and the use of ice cubes in cold drinks
- Money how to carry money and valuables discreetly e.g. money belts, zip armlets
- How to use phones abroad, money required and the code for phoning home
- What to do in an emergency
- Packing list any suggested items due to climate (e.g. sunscreen, sunhat, layers), activities (e.g. hiking boots, swimsuit), or culture (e.g. scarf to cover the hair/head)
- Packing list any suggested items due to climate (e.g. sunscreen, sunhat, layers), activities (e.g. hiking boots, swimsuit), culture (e.g. scarf to cover the hair/head), or local laws (e.g. masks / face coverings)

#### Visas/passports

The group leader should ensure that all members of the group have valid passports and visas (if appropriate) in the early stages of planning the trip. Photocopies of the group's passports should be taken for emergency use.

#### Language abilities

One of the leaders with the group, staff or guide, should be able to speak and read the language of the visited country.

#### Paperwork

The group leader should ensure that they obtain and take with them:

Travel tickets, passports and visas. It is also advisable to carry a separate list of the numbers of any travel documents/passports, and photocopies of all the group's documents:

- A copy of the contract with the hotel
- Medical papers and significant medical histories
- Copies of a list of group members and their details
- Details of insurance arrangements and the company's telephone number
- The name, address and telephone number of the group's accommodation
- Location of local hospital/medical services
- Passport size photographs of the participants

# Information retained by FIE Office emergency contact

Full details of the visit should be retained by FIE Office emergency contact while the visit is in progress. This should include:

- The itinerary and contact telephone number/address of the group
- A list of group members and their details
- Copies of travel documents, insurance documents, medical papers
- A copy of the contract with the hotel

# Emergencies

The group leader must ensure that all members of the group know what action to take if there is a problem.

The group leader and supervisors should know where the nearest US Embassy or Consulate is located and the telephone number. They should also know and understand how to contact the emergency services in the country concerned.

# **Emergency procedures**

Leaders in charge of participants during an excursion have a duty of care to make sure that the participants are safe and healthy. They also have a common law duty to act as a reasonably prudent parent would. Leaders should not hesitate to act in an emergency and to take life-saving action in an extreme situation.

If an accident happens, the priorities are to:

- Assess the situation
- Safeguard the uninjured members of the group
- Attend to the casualty
- Inform the emergency services and everyone who needs to know of the incident

#### Who will take charge in an emergency?

The group leader would normally take charge in an emergency and would need to ensure that emergency procedures are in place. The group leader should liaise with FIE Office emergency contact. Emergency procedures framework during the visit

#### Emergency procedures framework during the visit

If an emergency occurs on an excursion the main factors for leaders to consider include the need to:

- Establish the nature and extent of the emergency as quickly as possible
- Ensure that all the group are safe and looked after
- Establish the names of any casualties and get immediate medical attention for them
- Ensure that all group members who need to know are aware of the incident and that all group members are following the emergency procedures
- Ensure that a leader accompanies casualties to hospital and that the rest of the group are adequately supervised at all times and kept together
- Notify the police if necessary
- Notify the US Embassy/Consulate if an emergency occurs abroad
- Inform the FIE Office emergency contact, who should be accessible at all times during the visit



- Collect details of the incident which should include: nature, date and time of incident; location of incident; names of casualties and details of their injuries; names of others involved; action taken so far, including where casualties have been taken; action yet to be taken (and by whom)
- Notify insurers, especially if medical assistance is required (this may be done by the FIE Office emergency contact)
- Notify the provider/tour operator (this may be done by the FIE Office emergency contact)
- Write down accurately and as soon as possible all relevant facts and witness details and preserve any vital evidence
- Keep a written account of all events, times and contacts after the incident
- Complete an incident report form as soon as possible
- Ensure that, although group members may wish to reassure parents etc. individually, they are discouraged from making direct telephone or other forms of contact in the immediate aftermath of an incident. At that stage full details may not be available and inaccurate information might cause unnecessary speculation and anxiety for relatives and others at home
- Ensure that nobody in the group discusses legal liability with other parties
- Ensure that no one in the group speaks to the media. Names of those involved in the incident should not be given to the media. Media enquiries should be referred to Senior Leadership

# **Public Health Crisis**

All planned or proposed excursions should be reviewed for health and safety precautions specifically related to a declared public health crisis, particularly related to:

- Ensuring only vendors and service providers who can demonstrate their compliance with all local and national laws and guidance related to the crisis are utilized;
- Limiting student participation on the excursion (if applicable) to meet any regulations restricting group size;
- Increasing staff participation to mitigate the impact should a leader fall ill or display symptoms;
- Altering the excursion schedule to meet any regulations restricting overnight stays, mixed households or groups, and travel restrictions;
- Identifying alternative travel methods and accommodation plans should a participant fall ill or develop symptoms during the excursion;
- Updating students on any additional expectations and directives regarding student behaviour, packing (i.e. masks), and required documents (i.e. vaccination certification).

The group leader must ensure that all members of the group know what action to take if there is a problem (e.g. a participant develops symptoms, is identified as being a close contact of a confirmed case). The group leader and supervisors should know where the nearest medical facility is for appropriate care.

# Appendix 2.) US Higher Education Laws

As FERPA, the Clery Act and Title IX are United States federal laws, they do not directly apply to FIE policies and practices. However, FIE recognizes our US based partners are governed by these regulations and is committed to providing related information as available to assist partners in their compliance with these laws.

It is important to note the United Kingdom may have different definitions for and legal classifications of the crimes out- lined in Clery and Title IX which impedes a directly comparative reporting. Additionally, information provided by local authorities may not align directly with Clery and Title IX requirements.

In support of FIE's commitment to professional development, any staff member interested in learning more about or being trained to respond to incidents and concerns regarding the below laws and policies are encourage to speak with Senior Leadership.

# Confidentiality

FIE respects an individual's right to privacy and is committed to supporting all members of its community with com- passion and discretion.

Within the roles and responsibilities of FIE's staff and faculty, there are reporting lines and notification processes in place, including notification of partner visiting faculty and site staff. These procedures not only provide as comprehensive and complete support to students and colleagues as possible but also comply with national Spanish and US regulations related to reporting of serious crimes.

These reporting lines and notification responsibilities as well as legal requirements may impact guarantees of ab- solute confidentiality. Therefore, anyone reporting an incident, particularly one of a sensitive or personal nature, is encouraged to engage in open and honest conversations regarding support, assistance and confidentiality to fully understand these responsibilities and regulations.

Partner institutions should communicate any further expectations or home institution policies regarding confidentiality, particularly with regards to Title IX regulations, to Senior Leadership.

# **Clery Act**

For the purposes of reporting incidents to US partners, FIE uses the incident categories stated in the Jeanne Clery Act (20 U.S.C. § 1092(f): Disclosure of campus security policy and campus crime statistics) and as outlined by the Clery Centre for Security on Campus:

- Murder;
- Sex offenses, forcible or nonforcible;
- Robbery;
- Aggravated assault;
- Burglary;
- Motor vehicle theft;
- Manslaughter;
- Arson; and
- Arrests or persons referred for campus disciplinary action for liquor law violations, drug-related violations, and weapons possession; and
- Crimes ... of larceny-theft, simple assault, intimidation, and destruction, damage or vandalism of property, and of other crimes involving the bodily injury to any person, in which the victim is intentionally selected because of the actual or perceived race, gender, religions, sexual orientation, ethnicity, or disability of the victim



FIE will annually communicate with partners any incidents that occur within FIE facilities that violate the above laws. Please note FIE is committed to maintaining the confidentiality of persons involved in sensitive and personal incidents and therefore identifying details such as name, gender and home institution may not be shared with all partners.

# FERPA

As designated by the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99), FIE will not release nor discuss students' information to a third party without their consent; this includes names, contact information, grades and academic standing, internship placements, and judicial cases. Information that is shared as a matter of course with partner institutions and their on-site representative staff includes application materials, housing allocations, internship placements, transcripts and final grades, student welfare and behavioural concerns.

This exchange of information is in accordance with contracts between FIE and partner institutions and is specific to these contracts; FIE assumes partner institutions communicate this with their students in preparation for their study abroad programme. An emergency incident and/or concerns regarding a student's health and well-being, be it physical, mental, emotional or academic, may constitute additional information being shared with visiting faculty, partner site staff, placement sites and supervisors, home institutions and FIE faculty and staff; information in these instances will be shared on a need to know basis and with discretion.

# Title IX

In accordance with Title IX Education Amendments of 1972 (20 U.S.C. § 1681 et seq.), and consistent with FIE's policies regarding discrimination and equal opportunity, FIE prohibits any discrimination on the basis of sex or gender. FIE is committed to fostering an environment free of sexual harassment, intimidation or assault. As noted above with regards to the Clery Act, FIE will notify partners of any incidents that occur that violate the law or spirit of Title IX.

FIE maintains a complete list of partners' Title IX Coordinators and, in the event a Title IX violation is reported while a student is on-site, will communicate directly with the partner's designated coordinator as dictated by Title IX guidances. Partner institutions, visiting faculty or site staff who launch an internal investigation regarding Title IX do so with the support and cooperation of FIE. In order to support not only our partners but also our students, faculty and staff, FIE will:

- Compile and maintain a list of partners' designated Title IX Coordinators;
- Communicate any known Title IX violations to the designated Title IX Coordinator at the relevant partner institution;
- Provide internal training on Title IX policies to current FIE staff and faculty;
- Train new FIE staff and faculty on these responsibilities and reporting lines during new staff inductions;
- Make our policies and expectations regarding all conduct, including Title IX, transparent and available to all staff, faculty, prospective and current students;
- Provide annual reports to partners in line with Clery Act reporting guidelines

In the event any member of FIE's community is made aware of or has reason to believe a violation of Title IX has occurred, they should immediately initiate the Title IX communication tree:

FIE staff member  $\rightarrow$  Designated Referral Colleague  $\rightarrow$  Chief Operating Officer  $\rightarrow$  (if necessary) EIRG