

Committee(s): Finance and Estate Sub-Committee of the City of London School for Girls Board of Governors of the City of London School for Girls	Date(s): 14 February 2020 9 March 2020
Subject: CLSG Compliance Update	Public
Report of: Jenny Brown, Headmistress	For Information
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Summary

The City of London School for Girls (CLSG) has appointed a Compliance Manager, shared with the City of London School (CLS), to provide additional capacity to deal with the increasingly complex compliance requirements in schools. This initial report outlines the scope of work to be completed over the next 6 months to ensure that levels of compliance are well co-ordinated across key areas of the schools function including meeting the requirements of the Independent Schools Standards Regulations, health and safety, fire safety and risk management.

Recommendation(s)

This is the first report to be submitted and the Sub-Committee and Board are asked to note the current position.

Main Report

Background

1. A new position of Compliance Manager (CM) was created at the end of 2019. This post is a collaboration between CLSG and CLS and the purpose of the role is to oversee compliance requirements with relevant legislation including the Independent Schools Standards Regulations, oversee management of the school's health and safety, fire safety, risk register, asset register and promote continual improvement in these areas. This initial report outlines the Compliance Managers initial findings and priorities for the next 6 months.

Current Position

2. Key areas of focus for the CM over the next 6 months include:
 - Review current compliance operations, procedures and systems within CLSG and City of London Corporation (CoL) to gain a full understanding of the them;
 - Review actions arising from CoL Health and Safety Audits, CoL Fire Safety Audit, external Fire Risk Assessment and other relevant CoL Audit reports and work with designated managers to ensure recommendations are completed;

- Review CLSG Health, Safety and Fire policies and procedures to ensure they are aligned to the CoLs own documentation and to ensure they are legally compliant and follow current best practice;
- Review current training records, identify gaps in staff training against the CoL training Matrix and ensure staff are appropriately trained to meet our legal obligations;
- Review current availability of evidence required to meet the Independent School Standards Regs for Part 3 - Welfare, health and safety of pupils, Part 4 - Suitability of staff, supply staff and proprietors and Part 5 - Premises of and accommodation at schools. Work with relevant CLSG Managers and CoL departments to ensure we can demonstrate compliance in these areas are met; and,
- Working with the Bursar, update the Risk Register and review current identified risks to assess current relevance.

CLSG will be inspected by Independent Schools Inspectorate (ISI) in the next 12 months therefore a key area of focus for the CM will be inspection readiness. The Senior Deputy Head (SDH) has recently been given responsibility for inspection readiness and attended ISI training at the beginning of January. A review has already been undertaken by the CM of the required policies for ISI inspection and report sent to the SDH. Meetings between the SDH and CM have now been scheduled to work through the process of collating evidence for the next inspection.

The following is a breakdown of the actions from recent audit reports and at the next meeting we will be able to provide an update of the number of actions resolved. The CM and Facilities Manager will work together to breakdown the required actions to ensure they are closed out by responsible staff.

Audit report title	Number of overall actions / Non compliances	Number of Red RAG score 3 actions	Number of Amber RAG score 2 actions	Number for Green RAG 1 score actions	Current Overall Level of Assurance Red/Amber/Green
CoL H&S Audit	38	3	22	13	Amber
CoL Fire Audit	24	13	11	N/A	Amber
Fire Risk Assessment	26	4	10	12	Amber

The risk register is attached as an appendix for information and review.

Options

3. It is clear that resources are required to improve levels of compliance across the areas mentioned above and it is envisaged that extra staff and additional budgets will be required by CLSG to assist in meeting its targets.

Corporate & Strategic Implications

4. Corporate audit teams have highlighted deficiencies with compliance with CoL own policies and systems therefore the report findings should ensure CLSG can meet the objectives of the Corporation's Plans.

Implications

5. Failure to improve compliance could have implications of not meeting the standards required during an ISI inspection, which could lead to reputation damage to the school and corporation. The risks associated with not meeting health, safety and fire legislation include legal, financial and property damage implications to the Corporation and school communities.

Conclusion

6. The CM will work closely with department managers within the school and CoL to ensure that levels of compliance increase and to provide assurances that CLSG are doing all that is necessary to mitigate levels of risk to the school and CoL.

Appendices

- Appendix 1 – CLSG Risk Register

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