

<b>Committee</b>	<b>Date</b>
Finance and Estates Sub Committee of the Board of Governors of the City of London School for Girls	16 September 2020
<b>Subject:</b> CLSG Compliance Update	<b>Public</b>
<b>Report of:</b> Headmistress of the City of London School for Girls	<b>For Information</b>
<b>Report author:</b> Jane Elliott-Waine, Compliance Manager (CM)	

### **Summary**

This report provides members of the Finance and Estates Sub Committee with an update on Compliance matters at City of London School for Girls.

Outlined in the report is the continuing scope of work to ensure that levels of compliance are well co-ordinated across key areas of the schools function including meeting the requirements of health and safety, fire safety, risk management, Independent Schools Standards Regulations, policy reviews and the our approach to manage the risks of the COVID-19 pandemic.

### **Recommendation**

The Committee is asked to note the current position.

### **Main Report**

#### **COVID**

##### 1. Background

The School reacted swiftly to the challenges of the current Pandemic. A thorough Risk Assessment was completed for the phased reopening and Government, Department of Education and HSE advice and guidance was and is constantly reviewed.

##### 2. Current state of play

In line with Government Covid Strategy the School will reopen in September and a Covid 19 - Whole School Reopening Risk Assessment has been produced. This outlines our approach to managing the risks that cannot be mitigated and will continue to be reviewed every week. Covid has had an understandable knock on effect to other aspects of school operations, namely completion of actions from audit reports, see below

##### 3. Anything we are asking their guidance/approval on?

Whilst we fully appreciate the implications of not meeting audit targets some flexibility with timescales from CoL departments would be appreciated to reduce pressure on staff and resources at this time.

## Audits

### 1. Background

The School has received three audit reports related to health and safety in the last year and we are addressing recommendations arising, this includes:

- Fire risk assessment November 2019
- CoL Fire Safety Compliance Audit Sept 2019
- CoL Health and Safety Audit report July 2019

### 2. Current state of play

Action plans are in place for the three received audits and progress has been made on each. However, it should be noted that progress has been slower than envisaged due to not being able to be in the building, staff working remotely, and resources diverted to other tasks i.e. making the school Covid safe. Two main outstanding action from Fire Audit relate to outstanding FRA (90 day) actions and compartmentalisation involving to fire doors.

Audit report title	Number of overall actions / Non compliances	Completed	Number of initial Red RAG score 3 actions	Outstanding	Number of initial Amber RAG score 2 actions	Outstanding	Number for initial Green RAG 1 score actions	Outstanding
CoL H&S Audit	38		3	0	22	7	13	5
CoL Fire Audit	24		13	2	11	8	N/A	
Fire Risk Assessment	26		4	0	10	9	12	9

Training of staff is an area of concern in respect of health and safety and will require additional resources. Evidencing appropriate training has been challenging, including accessing CoL training records.

The risk register is attached as an appendix for information and review. The CM will continue to work with the new Bursar to ensure this is kept relevant and appropriately updated.

### 3. Plan for addressing remaining risks

All major outstanding actions are in progress but to accelerate completion a more structured approach by Senior Leaders, action audit reviews, is required to drive the process forward.

Work between the CM and the HR Team at CLS needs to be replicated at CLSG to improve evidence of compliance with CoL induction and training requirements as well as legal H&S training obligations.

Improved use of the risk register, particularly regarding the premises and outstanding actions from the fire risk assessment should be used to cascade risks that are not able to be sufficiently managed due to lack resources.

4. Anything we are asking their guidance/approval on?

It is envisaged that staffing levels will continue to be a challenge within the Facilities Team to complete actions from the current audits and any further actions arising from internal health and safety inspections and audits.

To improve training of staff and record keeping additional resources, time and budgets will be required to reach a base line standard.

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 to assist CLSG meet its targets. An additional dedicated budget for health and safety for appropriate targeted projects would assist in accelerating improvements.

### **Review of Policies and Procedures**

1. Background

A thorough review has been undertaken regarding the current Board policy approval process as well as reviews and rewrites of current policies, procedures and guidance.

2. Current state of play

The CLSG Policy Approval Process and Schedule will be presented at the next Board of Governors for comment and approval. The following Health and Safety documents have been rewritten to ensure they are fully compliant with statutory requirements as well as in line with CoL own policies:

- Health and Safety Policy
- Medical conditions, Medicines and Infections Control Policy
- First Aid Policy
- Fire Safety Policy and Procedures
- Risk Assessment Guidelines

Once approved it will be essential that staff are updated on the changes to these documents and that individual responsibilities are communicated and understood. The Compliance Manager continues to work closely with the Senior Deputy Head and with the creation of the Inspection Committee we are working through actions to ensure we are inspection ready.

3. Anything we are asking their guidance/approval on?

Note current position.

### **Corporate & Strategic Implications**

Corporate audit teams have highlighted deficiencies with compliance with CoL own policies and systems, the health and safety policy rewrites and subsequent relaunch to staff should ensure CLSG can meet the objectives of the Corporation's Plans.

## **Implications**

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**

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

## **Appendices**

- Appendix 1 – CLSG Risk Register
- Fire Risk Assessment – To Follow

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