

<b>Committee:</b> Board of Governors of the City of London School for Girls	<b>Date:</b> 5 October 2020
<b>Subject:</b> CLSG Compliance Update	<b>Public</b>
<b>Report of:</b> Headmistress of 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 Board of Governors 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(s)

We ask the Board of Governors 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 in line with Government Covid Strategy a separate Whole School Reopening Risk Assessment was produced prior to September. This outlines our approach to managing the risks that cannot be mitigated and will continue to be regularly reviewed.

##### 2. Current state of play

We continue to closely monitor Government, Department of Education and Health and Safety Executive advice and guidance, our approach is continuously reviewed to ensure we remain agile to this constantly changing situation. 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. The main high risk items have been completed, however, it should be noted that progress has been slower than envisaged due to staff access to the building during lockdown, staff working remotely, and resources diverted to other tasks i.e. making the school Covid safe.

Training of staff has been highlighted on each of the reports and obtaining appropriate evidence has been challenging, including accessing CoL training records. However, progress has been made, we have obtained initial reports and can start to work through the gaps identified but we will require additional resources to move forward with compliance.

### 3. Plan for addressing remaining risks

All outstanding actions are being acted upon and additional works are taking place over half term. To accelerate completion a more structured approach by Senior Leaders, including action audit reviews and inclusion of health, safety and fire reports and action plans on the Health and Safety Committee will assist in driving the process forward in the future.

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 review has been undertaken regarding the current Board policy approval process. The review was based on information gathered from the AGBIS Governor Policy Checklists, DfE Guidance - Statutory Policies for School, DfE Guidance for Independent Schools – The Independent Schools Standards, review of the content within our documents (who they relate to), assessment of what other independent schools approvals look like (where I can, from their websites) and best practice. Part of my remit was to attempt to align CLS and CLSG policies and procedures where practicable, this work is proceeding.

### 2. Current state of play

The Senior Deputy Head has submitted her report to changes to the policy approval process and schedule mentioned above. Where possible we are reviewing our documents with those at CLS, and visa versa, to support the ongoing partnership and collaborative working but also making sure that the uniqueness of the schools is maintained.

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

Additional content within the health and safety policy outlines a new approach to safety management along with a system of proactive monitoring that is required to provide assurance to senior leaders and the BoG that we are adhering to our own policies and procedures and those of the Corporation. Once approved it will be essential that staff are updated on the changes to these documents and that individual responsibilities are communicated and understood through training.

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.

## **Risk Register**

### 1. Background

Outstanding action for a risk to be added to the detailed Risk Register around Tier 2 and Tier 4 visa applications.

### 2. Current state of play

This was not actioned or communicated by the outgoing Bursar, new Bursar and CM will need to investigate reasons for its inclusion on the Risk Register and if deemed a perceived risk will update the Risk Register accordingly.

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

Clarification on the reasons for possible inclusion of Tier 2 and Tier 4 visa applications on the Risk Register, what was the cause, event and effect for CLSG?

## **Corporate & Strategic Implications**

Corporate audit teams have highlighted deficiencies with compliance with CoL own policies and systems, the health and safety policy rewrite 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 community.

## **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**

- COVID-19 Whole School Risk Assessment (Non-Public – see Appendix F to the Non-Public Report of the Headmistress)

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