



CATS
GLOBAL SCHOOLS

Overview
Health & Safety 2.0

Management of Health & Safety Policy

Owner:	Dave Robinson
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Going further than others

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Introduction

This document sets out CGS (UK) strategic approach to health and safety management. It contains the Statement of Intent that outlines the Group's commitment towards health and safety and describes the associated organisational responsibilities and arrangements in place to ensure this commitment is realised.

The management system is subject to review and improvements on a regular basis, in line with changes to any duties, responsibilities, processes and practices, systems of work and any of the Group's activities.

For the purpose of this UK Health and Safety Policy and the corresponding Management of Health and Safety, 'CGS' encompasses all independent Schools within the CGS Group. Appendix A in this policy outlines all brands covered by this policy.

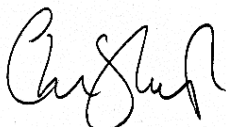
Health & Safety Policy Statement

CATS Global School recognises and accepts all its legal responsibilities and moral duties and is committed to complying with relevant health and safety legislation. CATS Global School is committed to conducting its business in a way that protects and ensures the health and safety of its employees, clients, visitors, contractors, and others who may be affected by any of the company's operations. Health and safety are an integral part of our activities and whilst the Executive Board takes overall responsibility, all directors, managers and employees share the responsibility for implementing this policy. The responsibilities include:

- Undertaking risk assessments in order to review the health and safety of all activities.
- Maintaining the workplace in a safe condition, including safe access and providing adequate facilities and arrangements for welfare at work.
- Providing suitable equipment, which is properly maintained and safe.
- Controlling the use of hazardous and dangerous substances.
- Ensuring safety and health in connection with the use, handling, storage and transport of articles.
- Providing such information, instructions, training and supervision as is necessary to ensure the health and safety at work of our employees, students and other persons.
- Maintaining arrangements for emergency response including fire and medical emergencies.
- Investigating all incidences of injury, near miss, unsafe conditions, and work-related ill health.
- Consulting with employees on health and safety matters.
- Ensuring that the company has access to competent health and safety advice through the employment and training of key personnel in health and safety qualifications.

CATS Global School is committed to maintaining a working environment where all its employees are conscious of Health and Safety and feel that they have a responsibility, and are free and able to contribute, towards the ongoing development and improvement of the company's Health and Safety Policy. This Statement and the Arrangements within this document are brought to the attention of all employees. They will be reviewed on a regular basis, and amended or revised as appropriate, in accordance with changes in legislation, best practise or changes in practise following engagement with employees. Any changes will be communicated across the Group for implementation.

Date of issue: 23 July 2021



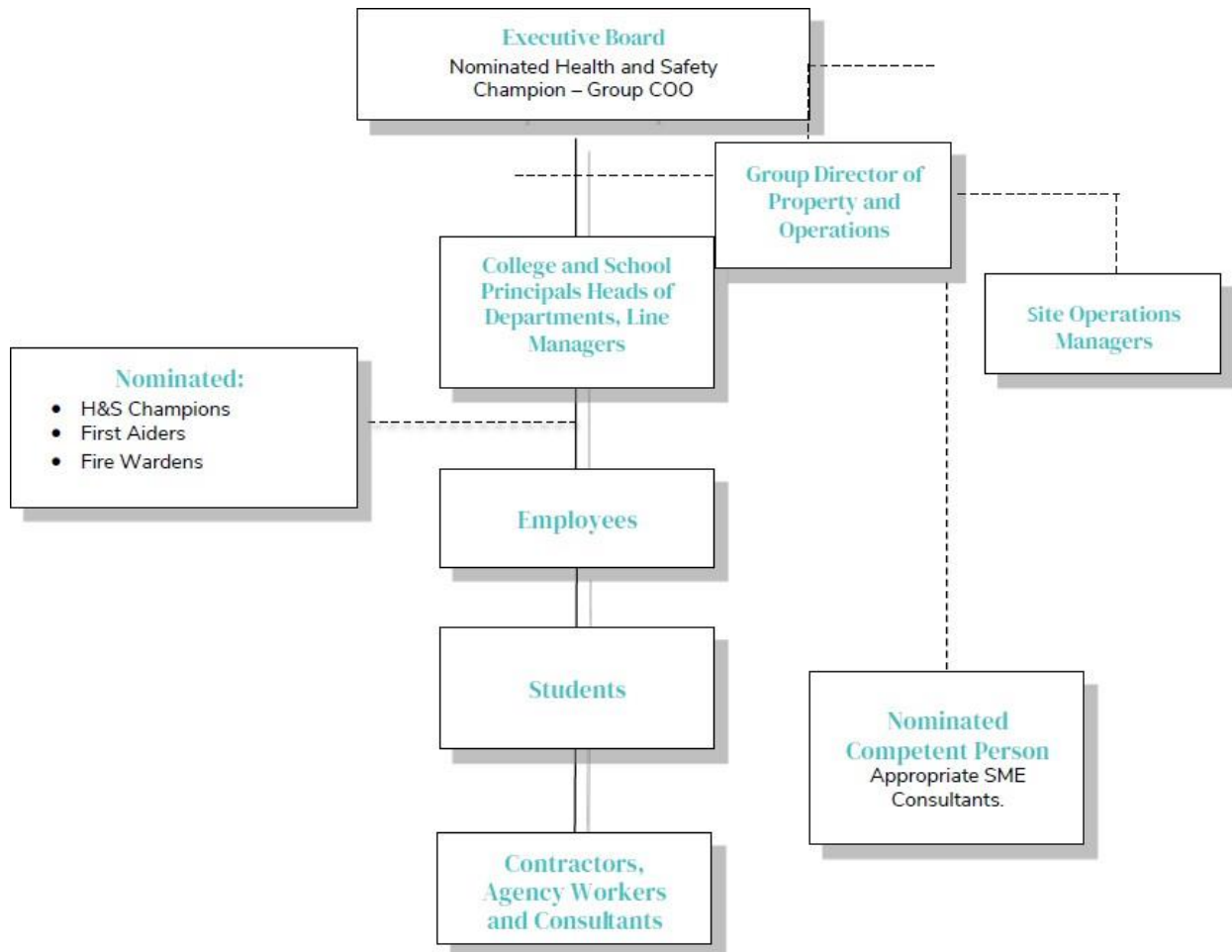
Chris Stacey

CATS Global School Group Chief Executive Officer, on behalf of the Executive Board

Review date: 8th April 2022

1. Organization for Health & Safety

1.2. Health and Safety Organisation Chart



2.2. General Responsibility for Health and Safety

To ensure the highest standards of health and safety are achieved throughout the organization, it is important that health and safety is embedded at all levels. All leaders, managers and employees must understand their responsibilities and be competent to carry out their duties.

2.3. Individual Responsibilities for Health and Safety

Executive Board

The ultimate corporate responsibility for Health and Safety rests with the Executive Board. They are accountable for the management of Health and Safety as they would be for any other function of management, however, in practice the duties below may be delegated. The Chief Operating Officer has been nominated as the Health and Safety Champion on behalf of the Executive Team.

Responsibilities:

- Determine and implement the objectives of the Health and Safety Policy with respect to each specific responsibility and other operations under their control.
- Be aware of the requirements of the Health and Safety at Work etc. Act 1974 and other current legislation and ensure that they are observed within the company so far as is reasonably practicable.
- Insist that sound working practices, health and safety policies and standards are observed.
- Ensure that adequate resources are made available to ensure the Health and Safety Policy objectives can be met and are kept under regular review.
- Ensure that compulsory Employers' Liability Insurance cover is in place.
- Arrange for funds and facilities to meet the requirements of the health and safety management system.
- Ensure that health and safety is on the agenda at board level meetings.
- Monitor the effectiveness of management to secure standards of Health and Safety, that comply with agreed procedures; in particular the Executive Board have specific responsibility for the development of a health and Safety strategy that enables the Health and Safety Policy objectives to be achieved.

- Set a personal example and promote a positive health and safety culture.

Chief Operating Officer

- Ensure the requirements of the Health and Safety Policy is implemented at all levels of the group
- Chair the health and safety committee and Steering committee meetings, provide minutes, action points and delegate persons to act on the outcomes of the meetings.
- Review and analyse the progress of all internal and external health and safety audits
- Strategically manage the health and safety functions of the Group Director of property and Operations and in turn, the Operations Managers at site level.
- Act as the main reporting line, in both directions, between the Executive Board and all other stake holders.
- Review trends and patterns of all accidents, incidents and near misses across the Group.
- Provide assistance, support, direction and guidance to the Group Director of Property and Operations, to enable this function to carry out their responsibilities effectively.
- Set a personal example and promote a positive culture of health and safety.

Group Director of Property and Operations.

- Responsibilities of the Group Director of Property and Operations include:
- Providing specialist advice and guidance to the Board of Directors and the Senior Management team on relevant legislation and implementation of the organisations Health and Safety Policy and standards.
- Advise and support Principals, Managers, Site Operations Managers and individuals on health and safety issues.
- Internally liaise with Managers responsible for health and safety related functions.
- Developing and putting in place an effective health and safety policy.
- Formulate and promote relevant policies, procedures and supporting guidance to comply with health and safety legislation.
- Monitor health and safety management and performance of the organisation, contractors and partners where appropriate.



- Produce an annual Health and Safety report for production to the Executive Board.
- Authorisation of budget spend for equipment, maintenance, refurbishment, and planned maintenance at all site levels.
- Develop and manage the process for procurement and authorisation of contractors at site level.
- Manage the Investigation of accidents, near misses and incidents, as appropriate.
- Manage the strategic elements of site level Operation Manager Functions.
- Request evidence of and monitor the effectiveness of the building management process and maintenance for all brands
- Manage the requirements of The Construction (Design and Management) Regulations 2015 for all newbuilds, alterations or projects on sites.
- Act as the Group representative for all building projects and manage the allocated budgets for these projects.
- Liaise with health and safety enforcement authorities (HSE, Local Authority and Fire and Rescue Service).
- Liaise with Trade Unions and students, on health and safety matters.
- Promote and advise on health and safety training.
- Monitor reports of accidents, near misses and incidents to identify issues and solutions. Provide statistics to the chief operating officer with the intention that trends and patterns can be managed.
- Set a personal example and promote a positive culture of health and safety.

Site Operations Managers

- Ensure that the buildings are safe, regularly maintained and compliant with health and safety legislation
- Investigate and support accident/near miss/incident investigations that relate to the building or the activities of the Site Operational teams.
- Ensure appropriate risk assessments are in place and regularly reviewed for specific risks e.g. fire, asbestos and legionella
- Provide local guidance and support around health and safety issues and concerns to Principals, line managers as and when required.



- Work in partnership with the Chief Operating Officer to implement Group wide policy, procedure and to promote positive health and safety culture.
- Communication/promotion of changes in Health and Safety within CATS Global School or health and safety legislation
- Ensure that statutory testing, inspections and maintenance is carried out on all buildings, plant, equipment, and any other safety critical installations, by competent persons.
- Ensure that all statutory records registers and other documents concerning the provision, installation, inspection testing and maintenance of plant and equipment and critical installations, are kept in accordance with relevant requirements.
- Ensure that the procurement of contactors includes a suitable process for checking that all contractors appointed are competent to carry out the required task.
- Peer Health and Safety audit of a separate geographical location. Feedback to be provided on actions provided by the external Health and Safety audit. Feedback to be provided against Health and safety internal and legislative requirements.

Health and Safety Consultant

- Carry out specific Health and Safety audits of each brand location as and when required. Review of Health and Safety policies and procedures.
- Provision of Health and Safety audit reports of each geographical location.
- Bi-annual (every two years) review of policies and procedures and provide feedback, as necessary.
 - Carried out and recorded.
 - Clear on the implementation of any control measures and that these control measures are effective.
 - Reviewed, updated and shared as and when required.
- Ensure that all necessary safety instruction, training, and retraining is completed.
- Ensure all employees and students within their remit have a level of supervision that is appropriate to their activity.
- Will ensure participation arrangements are in place for employees on matters of health and safety.
- Will ensure that in all areas under their control a programme of workplace inspections is carried out.
- Investigate and document all accidents, incidents or near misses concerning health

and safety with the view to identifying the cause(s) and preventing a recurrence.

- Review and implement reasonable adjustments if required following any employees return to work following an absence as identified during the return-to-work interview process.
- Be proactive in stimulating knowledge, interest and enthusiasm for health and safety amongst employees and students.
- Identify or support election of a Health and Safety representative, known as a Champion within CATS Global School, for each site who will take the lead on supporting and promoting a positive health and safety culture.
- Communicate and liaise with contractors on all health and safety matters

Laboratories/Workshops/Art Studios

Due to the higher risk in these areas and potential exposure to hazards, clear definition of responsibilities is required:

Persons responsible for relevant department

- Ensure that all team members are aware of their responsibilities and that appropriate controls are in place for equipment/use of chemicals
- Promote best practice and positive management of health and safety within the respective environments
- Support the reporting of all accidents, near misses and incidents and leading on investigation with support from the Group Director of Property and Operations when needed.
- Communicate with equivalent departments across Sites and Brands to create a collaborative culture of learning and safety throughout the Group.

Technician roles

- Provide support, guidance and advice for teachers and students that utilise the respective labs, workshops and studios.
- Ensure that environments are kept in good condition and that hazards are proactively managed.
- Maintain equipment, ensuring that it is in good condition and appropriate for use.
- Review risk assessment, procedure and guidance, ensuring they are relevant and communicated.

Teachers

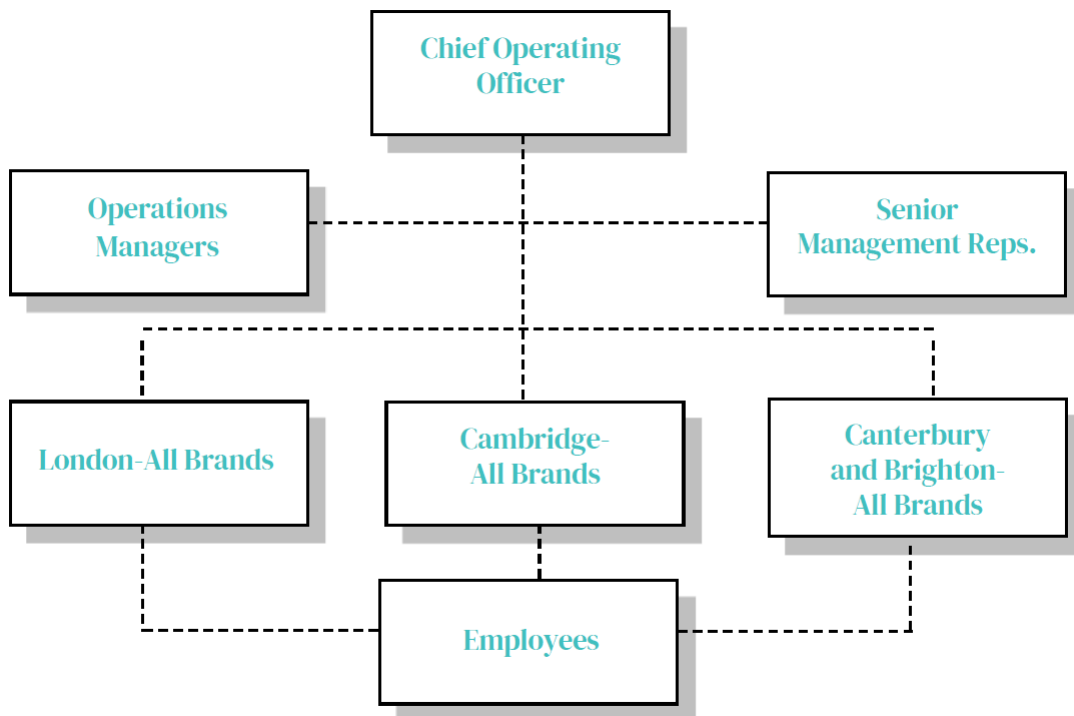
- Ensure that risk assessments are in place, followed, communicated, and regularly updated.
- Representing employees in dealing with health and safety inspectors (HSE inspectors)
- Receiving certain information from inspectors
- Attending health and safety meetings

Union appointed representatives must be paid for the time necessary to carry out their role and for any training; the trade union involved will offer training and will usually meet the costs of this training. Union reps should be included in the site health and safety meetings, as they will represent the health and safety interests of union members at the site.

3. Health and Safety Committee

To ensure that health and safety information is shared throughout the Group, horizontally and vertically, committees are held three times a year and are chaired by the Chief Operating Officer. The purpose of this Committee structure is to share best practice, improve communication and to approve and implement new procedures and policy. The Health and Safety Champion for each geographic location (UK) will attend the committee meetings on behalf of all brands within their geographic group. Operations Managers will attend alternating committee meetings, with attendance from senior management.

3.1 Structure



3.2 Site level meetings

These meetings are held on Site and encompass all personnel that contribute towards the health and safety across the site, including the Principal, Operations Manager and the Health and Safety Champion.

3.3 Steering Committee

The Executive board nominated health and safety champion chairs the steering committee, this committee meeting consists of nominated Principals and Health and Safety Champions from the Brand Committees. These can be rotated with each meeting. This meeting is the final approval on procedure and policy following feedback from the Health and Safety Committees; this also ensures the communication of health and safety issues to the board.

4. Health and Safety Arrangements

The detailed arrangements for health and safety management are set out separately within the organisations management policies. These policies form the foundation of the CATS GLocal School Health and Safety Management System, these policies are a minimum standard required for internal assurance, there may be some areas of the organisation that require enhanced levels of compliance to satisfy external audit. The policies are developed with transparency and engagement to an agreed process as follows:

- Drafting by CATS Global School by the Chief Operating Officer, in conjunction with appropriate business areas and if required external consultants.
- Reviewed and discussed at Brand health and safety committees.
- Approved by the CATS Global School Health and Safety Steering Committee.
- Published and launched by Group Director of Property and Operations.

The policies will be reviewed every two years or sooner where there are legislative changes, new health and safety guidance or changes in business activities or procedures.

5. Health and Safety Communications

This section sets out the way that the organisation aims to communicate with regards health and safety. It outlines the methods and the frequencies that will be used in order to achieve these aims in an effective and efficient way.

Communication Objectives

- To actively improve the way in which the Group communicates with regards health and safety.
- To support effective implementation of CATS Global School health and safety



- policy, strategy and associated policies, procedures and guidance.
- To support the engagement of all departments in health and safety by setting out the means for developing and implementing a range of internal communication methods.
 - To identify and develop health and safety campaigns aimed at increasing employee and student participation.
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Target Audiences

Internal

- Schools, Colleges, Accommodation buildings.
- Head Office and other administration/sales offices.
- Employees
- Students
- Visitors

External

- Neighbouring businesses and residential property
- Enforcing agencies for example, HSE, Fire Service
- Landlords
- Contractors

Communication Principles

To ensure a consistent style and approach, health and safety communication should be:

- In plain language that is understandable by all.
- Clear and avoiding the use of unnecessary jargon and acronyms.
- In an appropriate tone and format that is positive, courteous and helpful, and that uses images where possible.
- Encouraging of receiving constructive feedback and criticism.
- In the most appropriate media for conveying the information, e.g. email, telephone, face to face meetings, posters, newsletters, web links, campaigns, etc.

This table illustrates possible communication methods:

Topic Examples	Target Audience	Communication Media
<p>Health and Safety related policies</p> <p>Procedures and guidance</p> <p>Updates and revisions to the above</p>	<p>Heads/Directors of Departments</p> <p>Legal/Compliance Team,</p> <p>Principals,</p> <p>Operations Managers</p>	<ul style="list-style-type: none"> Email to CATS Global School Senior management distribution list and appropriate e-mail addresses Published in central drive Health and Safety policy folder Posters where appropriate
<p>Health and Safety Information and Bulletins</p>	<p>All Employees</p>	<ul style="list-style-type: none"> Email to employee's dependent on the level of information from either Group Director of Property and Operations/ Principal/HS Champion. Recorded in G drive Health and Safety information folder
<p>Health and Safety advice and guidance (general and specific)</p>	<p>All Employees (and students as appropriate)</p>	<ul style="list-style-type: none"> Face to Face individual and meetings Email Telephone Health and Safety guidance/procedure documents
<p>Health and Safety Training</p>	<p>Heads of Departments,</p> <p>Health and Safety Champions,</p> <p>Line Managers, all employees</p>	<ul style="list-style-type: none"> Email to CATS Global School Senior management distribution list Email to all persons requiring training
<p>Accident Investigations</p>	<p>Person/s responsible for injury/incident/near-miss person / work activity</p>	<ul style="list-style-type: none"> Face to Face meetings Email Telephone

6. Training and Competence

To support the development of health and safety competence our employees the Group has a Health and Safety Training Programme/Matrix.

The Health and Safety Training Programme and Matrix identifies training which is both statutory and mandatory for employees to attend. Statutory training is classified as training which is a legal requirement under health and safety law. Mandatory training is defined as training which is a requirement of the Group.

The Organisation's Health and Safety Training Programme and Matrix will ensure that:

- The training needs analysis of employee's groups has been identified and is targeted accordingly – clearly identifying those to which mandatory attendance is required.
- The identification of the frequency for refresher training, and the method of delivery e.g. face to face, e-Learning, cascade training etc.
- All training courses are supported by course descriptors to provide sufficient information to delegates in terms of course aim and objectives.
- All courses are evaluated to continually improve and identify health and safety training need, value, and effectiveness
- It is regularly updated as and when further training is identified as required to further develop the system.

7. Monitoring of Health and Safety Performance

Group compliance with legislation and Group health and safety policy will be undertaken and monitored. This is required to ensure a consistent approach and promote continual improvement throughout the Group.

- **Workplace Inspection** – scheduled inspections of workplaces/areas carried out by Principals and Health and Safety Champions, Operation Managers and external Health and Safety Consultants.
- **Safety Sampling** – Each Operations Manager will audit each geographical location on a 6 monthly basis to ensure compliance with Health and Safety.
- **Audit (Assurance Review)** – Conducted by external Health and Safety Consultants,

utilising standard audit protocols. Subsequent Reports are issued to the Group Director of Property and Operations and the Chief Operating Officer. Site Operations Managers and the Group Director of Property and Operations will devise an action Plan to ensure implementation of any identified improvements. A programme of monitoring completion of actions will be implemented and agreed.

- **Health and Safety Review** – Principals, Department Heads and Line Managers annually review their health and safety position.
- **Statistics** – Trend analysis and sector benchmarking of workplace accidents, near misses, incidents and work-related ill health to define, measure and compare patterns and progress in health and safety practice.

8. Reporting of Health and Safety Performance

There is a need for the Group to ensure that the objectives of its Health and Safety Policy are met and furthermore that there is sufficient data/information to enable informed decisions in its efforts to continually improve health and safety performance.

An annual health and safety report will be produced for presentation to the Group Executive board, this report will cover:

- Health and Safety Management
- Training and Development
- Key Health and Safety Activities
- Group Health and Safety performance including accident, near miss and incident reporting
- Future Plans and Goals

The Annual Report will include the requirement for the CEO sign the Group's Health and Safety Policy Statement on behalf of the Executive Board if there are any changes to the policy or it is due for its bi-annual review.

9. Near-Miss, Accident and Incident Reporting and Monitoring

The Group requires all its employees, students and third parties, to report accidents, near misses and incidents that occur when at any CATS Global School location or otherwise involved in its activities.

To ensure the reporting and investigation of accidents, near misses and incidents the Group has accident and near miss/incident reporting forms and a supporting Accident, Near Miss and Incident Reporting Policy. Reporting,

Investigation and Monitoring ensures that:

- All accidents, however small, which happen to the employees or student whilst on CGS premises, or when carrying/participating in Group activities.
- Prompt action is taken to control risks appropriately in the aftermath of an accident, near miss or incident
- Person(s) injured following an accident receive treatment from first aider etc. if/as appropriate.
- Where ill health is attributed to work/work activities that these are reported to the HR team and Group Director of Property and Operations.
- Reporting Forms are readily accessible through electronic reporting; where this is not practicable the form is readily downloadable and is located on the G drive health and safety, accident, near miss and incident folder.

Any event will be investigated by the appropriate health and safety responsible person/s initially, supported wherever needed by the Site Operations Manager. For more serious events, the Group Director or Property and Operations will co-investigate and produce a detailed investigation report.

10. Appendix A.

Brands covered by this Policy

Brand	Brand Lead
CATS Global School	
Cambridge School of Visual & Performing Arts	
Stafford House	

11. Version History

Revision number	Page numbers/section	Revised by/Date	Authorised by/Date
1.0	First draft new document	D.Haffenden 16/09/2020	



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