

ISP Group Child Protection and Safeguarding Policy

Policy Owner: Group Head of Operational Risk

Revised: July 2024

RATIONALE

At ISP, we are committed to safeguarding and promoting the welfare of children and young people and we expect all our employees and volunteers and any contractors / consultants and partner agency staff in our schools to share this commitment. In line with this, we expect them to recognise where a student is at risk of, or is actually being harmed, and to do all they can to reduce further risk or harm.

Our schools are particularly important in protecting our students; our school colleagues are in the best position to identify concerns early and to provide or recommend support for students as well as helping to prevent these concerns from escalating.

At ISP, we adhere to the following basic child protection and safeguarding principles:

- A child's welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- All students have the same equal rights to protection, but we recognise that we need to do more for some because of their special educational needs, disability, gender, religion, or sexual orientation.

POLICY AIMS AND OBJECTIVES

ISP accepts its obligation to protect the health and safety of all its employees, students and visitors in any of its Operating Entities. Therefore, the purpose of this Policy is to set out our responsibilities, and the responsibilities of those working for us, in observing and upholding our position on health and safety, and to provide information and guidance to those working for us on how to recognise and deal with health and safety issues.

POLICY SCOPE

This Policy Statement is mandatory for all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, and volunteers, wherever located.

In the case of associated businesses, contractors, external consultants and advisors, and others who may do business on behalf of ISP, we will require the adoption of policies consistent with the principles set out in this Policy Statement, where appropriate.

This Policy Statement also covers students and visitors to any of our schools, offices and any event or school activity hosted by the Group anywhere in the world.

Each Divisional CEO and Regional Managing Director is responsible for ensuring that any fundamental change to the guidelines in order to meet the needs of a school or region are approved by the Group Head of Operational Risk prior to their implementation.

DEFINITIONS

Employee: Any full-time, part-time or contracted Employee of all Schools pertaining to the Group.

Operating Entity (Entities): Any property (school or otherwise) that is owned, leased, rented on a short term let or otherwise used by the Group.

Student: Any minor 18 or under that receives tuition or instruction of any form at an Operating Entity or from an Employee.

Visitors: Any person who is not an employee or a student who engage in any activity at any Operating Entity.

ORGANISATIONAL RESPONSIBILITIES

It is the policy of the Group to first and foremost meet the local legislation of the country they are operating in for all its Operating Entities. The basis of UK legislation will act as a standard for the provision and maintenance of a healthy and safe teaching, working and learning environment when local legislation does not provide guidance.

All staff will be provided with the necessary equipment, information and training as is necessary to implement the policy and achieve the ISP stated health and safety objectives.

All injuries or illnesses sustained by a person on company premises, on educational visits or any company trip must be reported to the designated person for the school or office where it occurred. Accident records are a crucial part of the effective monitoring of the policy and therefore should be accurate, comprehensive and recorded in a timely manner.

All schools are required to complete the Local H&S Management Plan Template that defines the specific people that carry out the roles and responsibilities described within this document.

ROLES AND RESPONSIBILITIES

All employees:

- recognize that it is their duty to take reasonable care for their own welfare, the welfare of those around them and to ensure their actions do not harm themselves or anyone else.
- recognize that it is their duty to report immediately any hazard which has the risk to cause harm to themselves, students or visitors.
- recognize that if they are unsure how to perform any task or has not been appropriately trained it is their duty to report this to their line manager or the health and safety coordinator for their operating entity.
- whether full, part time or contracted will have a police check covering the last 10 years of their residence and working life prior to commencing work. Checks for the current country they are working in will be renewed every 3 years.
- recognize that deliberate disregard of the health and safety policy may result in disciplinary proceedings.
- will always co-operate with management in the implementation of and adherence to health and safety policy and procedures.
- Will not intentionally or recklessly interfere with or misuse anything provided for the purpose of health and safety at work.

The Group Chief Executive has overall responsibility for health and safety and in particular for:

- ensuring that adequate resources are available to implement the health and safety policy.
- ensuring health and safety performance is regularly reviewed at board level.
- monitoring the effectiveness of the health and safety policy.

The Group Chief Financial Officer is responsible for:

- Providing the direct influence of the board on health and safety policies and strategies and monitoring progress.
- Reviewing the policy annually.
- Determining health and safety objectives and assign clear responsibilities for meeting them.
- Allocating resources to implement the health and safety policy, achieving health and safety objectives, avoid personal injury and property damage so far as is reasonably practicable through a structured risk assessment programme.
- Ensuring that health and safety responsibilities are clearly communicated to employees.
- Establishing a system of monitoring and performance measurement that ensures effective implementation and working of the Group's health and safety policy and strategy.

The Group Head of Operational Risk is responsible for the day-to-day operation and monitoring of the health and safety management system and:

- Liaising with all schools and offices, Health & Safety representatives and safety consultants.
- Overseeing the implementation of safety and health programmes.
- Supporting the implementation of training identified by the Regional Managing Directors.
- Monitoring monthly safety performance reporting systems.
- Actively promoting all health and safety issues.
- Ensuring that all company facilities have an onsite audit or a self-assessment on a yearly basis.
- Prioritising safety issues.
- Reviewing and monitoring the outcomes of audits and inspections and review accidents and incidents.
- Reviewing the implications of any changes in Health and Safety Legislation

The Group Health and Safety Manager is responsible for:

- Liaising with all schools, Health & Safety representatives and safety consultants.
- Assisting in the implementation of safety and health programmes.
- Assist in the creation of in-house training identified by Heads of School.
- Creation of monthly safety performance reporting.
- Actively promoting all health and safety issues.
- Assisting in carrying out yearly audits of all company-owned operating entities as directed by the H&S Director.
- Assisting schools and offices in the completion of 'high' audit tasks identified in the yearly audits
- Assist in the review and monitoring of the outcomes of audits and inspections and assist in the review of accidents and incidents

The Divisional CEOs and Regional Managing Directors are responsible for:

- Supporting the Group Chief Executive and Group Safety Director in the implementation of an effective health and safety strategy.
- Ensuring that the group health and safety policies are effectively implemented and meet the needs of the business.
- Determining health and safety objectives and assign clear responsibilities for meeting them.
- Allocating resources to implement the health and safety policy, achieve health and safety objectives, avoid personal injury and property damage so far as is reasonably practicable through a structured risk assessment programme.
- Ensuring that health and safety responsibilities are clearly communicated to employees.

- Assisting in the establishment of a system of monitoring and performance measurement that ensures effective implementation and working of the Group's health and safety policy and strategy.

The SLT/School Principals are responsible for:

- supporting the Regional Managing Director in the development and implementation of an effective health and safety strategy.
- assisting in regular reviews of the Group's health and safety strategy.
- ensuring that the Group Health and Safety Policy is implemented and is effective and that it is reviewed on a regular basis to ensure that it remains effective.
- determining health and safety objectives and assign clear responsibilities for meeting them.
- allocating resources to implement the health and safety policy, achieve health and safety objectives, avoid personal injury and property damage so far as is reasonably practicable through a structured risk assessment programme.
- ensuring that health and safety responsibilities are clearly communicated to employees.
- assisting in the establishment of a system of monitoring and performance measurement that ensures effective implementation and working of the Group's health and safety policy and strategy.
- liaising with the local health and safety enforcement authority, the Company's/Schools insurers and other external bodies;
- submitting any statutory notification reports as required by local legislation.
- identifying the implications of changes in local legislation or guidance;

Heads of Year/Department are responsible for the effective management of health and safety within their own area or function. In particular this includes:

- ensuring that safe systems of work are implemented.
- enforcing personal protective equipment requirements.
- ensuring that employees/pupils are adequately trained for the tasks they perform.
- monitoring classrooms, offices and equipment, reporting faults where necessary.
- identifying and reporting health and safety related problems with issues.
- identifying training needs.
- investigating and reporting on accidents and incidents.
- participating in the risk assessment program.
- setting a good example on health and safety matters.

The H&S Coordinator is responsible for coordinating many health and safety activities and for acting as the primary source of health and safety advice within the Company/School. These responsibilities specifically include:

- coordinating the Company's/Schools risk assessment programme.

- ensuring the accident investigation and reporting procedure is followed.
- coordinating the health and safety inspection programme.
- identifying health and safety training needs.
- providing or sourcing health and safety training.
- providing health and safety induction training to new employees.
- preparing and submitting progress reports on the annual health and safety audit.
- sourcing additional specialist health and safety assistance when necessary;
- displaying a copy of the Company's Health and Safety Policy Statement, Health and Safety Responsibility Chart, and Fire and Accident Reporting Procedure.
- ensuring their building has adequate fire marshals and first aiders at all times.
- completing the Health and Safety Induction Checklist for new starters and long-term temporary employees/Teaching staff;
- keeping and maintaining the Health and Safety Guidance document and updating with any new procedures when given.
- ensuring that any actions arising from the health and safety audits are addressed.
- liaising with the different departments to ensure that recording of any hazardous substances and materials is carried out.

The Human Resources department will:

- Ensure that adequate training is undertaken at a competent level.
- Maintain health and safety records, e.g. staff development and training, etc.

Fire marshals will:

- Participate in all required fire marshal training.
- Know who works in their allotted area.
- Ensure that all employees/Teaching Staff, Pupils in their area are familiar with their assembly points, and nearest escape routes.

First aiders:

- All first aiders must have the necessary training and qualifications, as evidenced by a current first aid certificate issued under an approved training course.
- It is the responsibility of all first aiders to maintain a valid certificate of competence and to advise their manager when it is due to expire. The first aider will also keep a record of training and qualifications. The list of first aiders and their locations are displayed on notice boards and updated / maintained by the H&S Coordinator.
- All information of a personal nature obtained in the course of first aid duties will be treated as confidential.
- ensure that the first aid box for which they are responsible, is appropriately stocked and maintained in a clean, tidy condition, obtaining replacement items as necessary.

SUPERVISION, COMPLIANCE AND MEASURING PERFORMANCE

The Health and Safety policies will be shared across the organisation and will guide the setting of objectives for key staff. These objectives will be established in accordance with the criteria of continuous improvement, to ensure that the terms of the H&S Policy are met through the efforts and collaboration of all employees and the support of the management team of the company.

All members of the Group with managerial or supervisory duties are responsible for ensuring that personnel comply with the Group H&S policies.

The Group Safety Team shall undertake periodic audits or self-assessments and from the findings the schools will be provided a report that sets specific targets and timescales for H&S performance at the Operating Entity level. The audit is submitted to the Principal of the School and to the Regional Team and it is their responsibility to action all targets. The Group Head of Operational Risk, Divisional CEO's and Regional Managing Directors of Schools will meet either as a whole, or in part at least twice a year, to discuss and assess the actions for the Group and or its Operating Entities.

BUDGETS, DELEGATED AUTHORITY LIMITS AND POWERS

On a day-to-day basis, Health and Safety decisions will be made through delegated powers as follows:

1. The Chairman, CEO and CFO of ISP have specifically delegated powers related to H&S to the Divisional CEO's and Group Head of Operational Risk.
2. In turn, the Divisional CEO's have delegated powers to the respective Regional Managing Directors. These are set out in the Group Authorisation Limits and Powers Table.
3. In turn, the Regional Managing Directors can delegate powers to their teams/schools. These are set out in the Group Authorisation Limits and Powers Table.

All financial commitments in the Group need to be approved before the commitment is made. Approval is either given through a pre-approved budget or alternatively a signed authorisation form.

The policies describing how budgets and how expenditure is authorised are separate to this document.

TARGET SETTING AND INFORMATION REPORTING

As a principle of operation, Regional Managing Directors will be set targets for the schools and Operating Entities in their region. These will be set by the Group Head of Operational Risk in consultation with the Divisional CEO's and Regional Managing Directors. A key aspect of the Regional Managing Directors role is to ensure that schools are meeting targets.

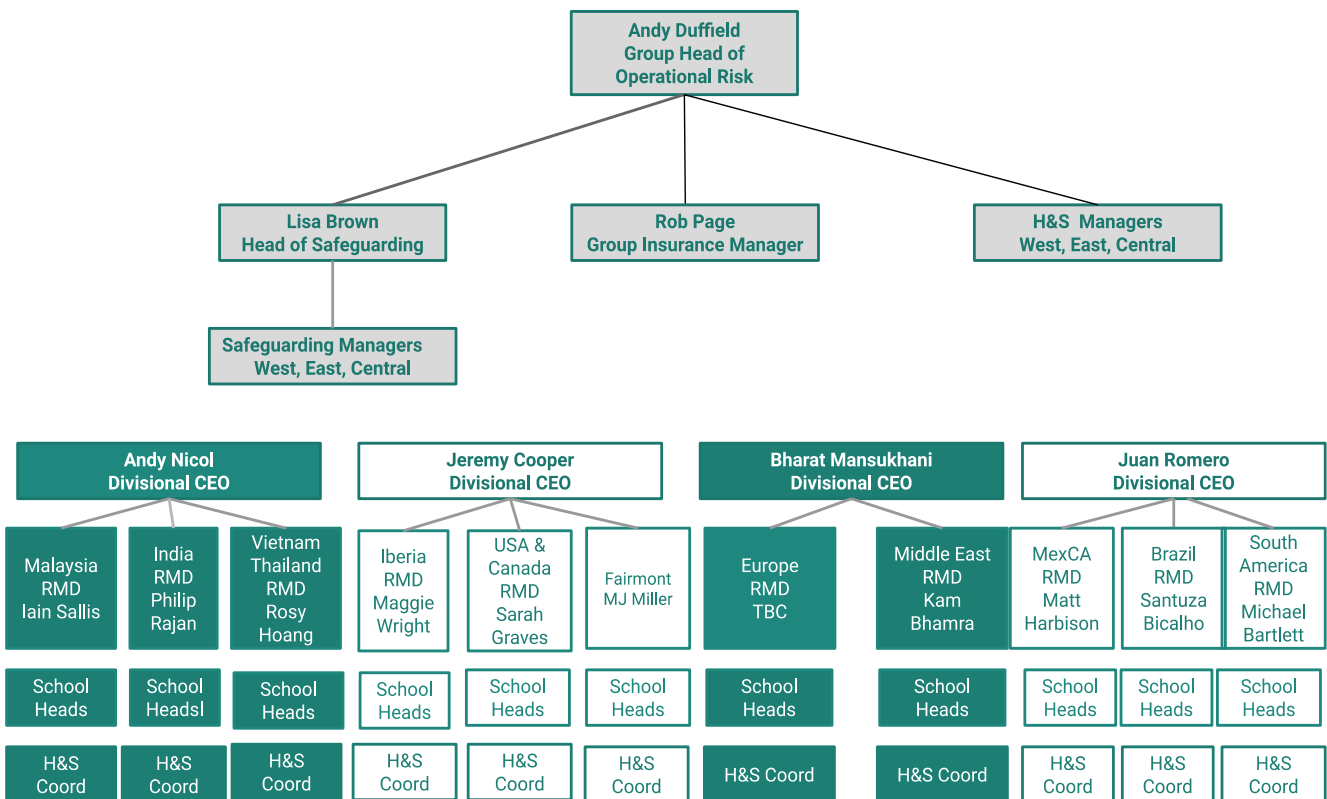
In order to both help assess school performance as well as help the Group to build up a uniform trend history, Schools and Operating Entities will ensure that the following information is recorded in full and in a timely manner in the systems established for each one:

1. Incidents, accidents and near misses (360).
2. Housekeeping inspections (360).
3. Emergency drills (360).
4. Follow-up of actions raised during audits, self-assessments, EV3 and Houskeeping inspections (360).

Finally, Schools must also run periodic training to ensure that Employees are familiar with all policies.

APPENDIXES

H&S ORGANISATIONAL MATRIX



LOCATIONS

Central	Division	Region / Locations
<p>CEO Steve Brown sbrown@ispschools.com</p> <p>CFO Darren Mee dmee@ispschools.com</p> <p>Group Head of Operational Risk Andy Duffield aduffield@ispschools.com</p>	<p>DCEO Andy Nicol anicol@ispschools.com</p>	<p>MALAYSIA 9 Locations RMD - Iain Sallis isallis@ispschools.com</p>
		<p>INDIA 3 Locations RMD - Philip Rajan prajan@ispschools.com</p>
		<p>VIETNAM AND THAILAND 4 Locations RMD - Rosy Hoang rhoang@ispschools.com</p>
	<p>DCEO Jeremy Cooper jmcooper@ispschools.com</p>	<p>IBERIA 12 Locations RMD - Maggie Wright mwright@ispschools.com</p>
		<p>USA AND CANADA 8 Locations RMD - Sarah Graves sgraves@ispschools.com</p>
		<p>FAIRMONT 5 Locations</p>
	<p>DCEO Bharat Mansukhani bharatm@ispschools.com</p>	<p>EUROPE 9 Locations RMD - TBC</p>
		<p>MIDDLE EAST 9 Locations RMD – Kam Bhamra kbhamra@ispschools.com</p>
	<p>DCEO Juan Romero jromero@ispschools.com</p>	<p>MEXCA 10 Locations RMD – Matt Harbison mharbison@ispschools.com</p>
		<p>SOUTH AMERICA 11 Locations RMD – Michael Bartlett mbartlett@ispschools.com</p>
		<p>BRAZIL 2 Locations RMD – Santuza Bicalho sbicalho@ispschools.com</p>

PRIMARY POLICIES

- Statement and Responsibilities
- Risk Assessment
- Educational Visits
- Fire Safety
- Lockdown
- Electricity
- Accidents, Reporting, Incidents and Near Misses