

Crisis Management Policy

Policy Title:	Crisis Management Policy
Policy Number:	CMP01
Version:	<p>1.0 This Policy replaces the Critical Incident Response Protocols document</p> <p>1.1 Review of policy and changes in silver and gold members</p> <p>1.2 Review of policy and changes in silver and gold members</p> <p>1.3 Review of policy and changes in gold members</p>
Effective date:	01 October 2019
Scheduled review date:	01 April 2023
Policy approver:	Chief Executive Officer
Policy owner:	Group Health & Safety Function
Key Stakeholders	<p>Security Function</p> <p>Child Safeguarding Function</p> <p>Communications Function</p> <p>Services</p>
Policy reviewer:	Chief Operating Officer
Relevant related policies:	None
Other relevant documents:	Emergency Response Plans

1. Central Policy Statements

- 1.1 A Crisis Management Policy document is the overarching policy document which sets out the guidelines and references for dealing with events of various natures at the schools, services entities and SSC offices that have the potential to impact negatively on GEMS Education's staff or students or its brand reputation.
- 1.2 This document outlines the crisis response structure, roles, responsibilities and operating procedures for effective crisis management at GEMS Schools, services and SSC.
- 1.3 The actual management of crisis events is the responsibility of the first line of defence (Schools / Business Units / Departments); this policy however defines how the latter will receive the required support from Corporate Office towards managing these incidents, working to a pre-planned procedure.

2. Policy Scope

- 2.1 This policy applies to GEMS MENASA Holdings Limited (the "Company" or GEMS) and its subsidiaries and subsidiary undertakings (together with the Company, the "**Group**", and any of them, a "**Group Company**"), which includes:
- 2.2 All individuals working at all levels and grades, including all teaching staff, senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, seconded staff, casual workers and agency staff, of GEMS, wherever located; and
- 2.3 All of those who represent GEMS in any capacity, including agents, sponsors, intermediaries, representatives and finders and introducers.

3. Underlying Policy Statements

- 3.1 The Crisis Management Policy ("the CMP") applies to incidents that prompt the activation of the Bronze (Emergency Response Team), Silver (Crisis Coordination) and, if critical, the Gold (Crisis Management) Teams to lead, support and guide in the management of a crisis affecting GEMS schools, services and corporate offices.
- 3.2 The policy takes a team approach to emergency response, with each team member given specific roles and responsibilities for responding on site to an emergency. It also emphasizes on the crisis reporting channels from the Bronze Team to a higher level and escalation to the Gold Team in case of a declaration of a crisis.
- 3.3 Crisis Management plays a key role in making sure that the broad consequences of a serious incident are effectively recovered, managed and reported.

Please refer to **Appendix A** for an illustrative representation of the Escalation of Incidents through the three layers (Bronze, Silver and Gold Teams).

4. Process Flow Description

- 4.1 Following the occurrence of an incident at the schools/ services / SSC, which is managed on site by the Emergency Response Teams (Bronze Level Team), all incidents are reported to the Silver Team Lead (as per appendix A).
- 4.2 Silver Team Lead then communicates the incident and gathers the entire Silver Team members for review and further action, if needs be.
- 4.3 Silver Team Lead takes the decision on escalating the event to the Gold Team Leads. A Gold Team WhatsApp escalation group has been established to allow this. Alternatively, the Silver Team lead pushes back in case of non-criticality of the event (according to the incident reporting scale matrix, refer to **Appendix E**).
- 4.4 A silver level WhatsApp Group is created to include all members of the Silver Team, to share and discuss the incidents details and to stay informed about the incident progress and discuss any need for escalation to the Gold Level. Additional members may be included when necessary.
- 4.5 In the event of the declaration of a crisis, the Silver Team Lead will firstly contact the gold team leads and then based upon discussions with the gold team leads, will arrange a Crisis Management meeting, with required members of the Gold Team; this will be done as soon as reasonably possible.

Please refer to **Appendix A**, which provides the flow of events through all bronze silver and gold levels.

Please refer to **Appendix B**, which details the three-tier response team's roles and responsibilities.

Please refer to **Appendix C**, which provides the assigned team members of all levels.

5. Definitions

- 5.1 Incident: An unlikely situation or circumstance which may result in injury, loss of life, destruction of property, or cause the interference, loss, or disruption of an organisation's normal business operations to such an extent that it poses a threat.
- 5.2 Crisis: Critical event, which, if not handled in an appropriate manner, may dramatically impact an organisation's profitability, reputation, or ability to operate.
- 5.3 Emergency Response Plans: A documented list of activities to commence immediately to prevent the loss of life and minimise injury and property damage
Note: Every school will have their own Emergency Response document.
- 5.4 Crisis Management Policy: A high-level overarching document containing guidelines and align different SOPs for dealing and managing crises.
- 5.5 SSC School Support Centre: GEMS central head office, where support departments are based.

6. Roles & responsibilities

6.1 Gold Team (or Crisis Management Team (CMT))

- Team consisting of high-level executives (SMC members, other specialists, Silver Team Lead) and other stakeholders called as required;
- This team is responsible for executing the strategic response for incidents that have escalated into fully-fledged crises;
- This team is responsible for coordinating with regulatory authorities and obtaining the necessary approvals (such as KHDA approval in case of a need of a school closure); and
- Support the Bronze Team on ground by providing all needed resources and directions during the course of the event. Please refer to the ERPs respective to the emergency area for more details on roles and responsibilities and the emergency response process flow.

6.2 Silver Team (or Crisis Coordination Team (CCT))

- Team consisting of crisis areas specialist as key role players (i.e., Communication, HSE, Child Safeguarding and security) and the appropriate stakeholders responsible for coordinating with both Gold and Bronze Teams and assessing the incidents;
- Responsible for assessing and classifying the incidents reported by the Bronze Team; and
- Responsible for training schools and business units on the ERPs and updating the plans.

6.3 Bronze Team (or incident management team)

- Manage the incident at an operational level. This will include liaising with any on-site emergency services.
- Report to the Silver level lead for further escalation, when needed.
- Ensure their respective teams are informed of the plan and any subsequent responsibilities.
- Identify the members of the emergency response team and define this within the operational emergency response plan, ensure that it is reviewed and updated annually.

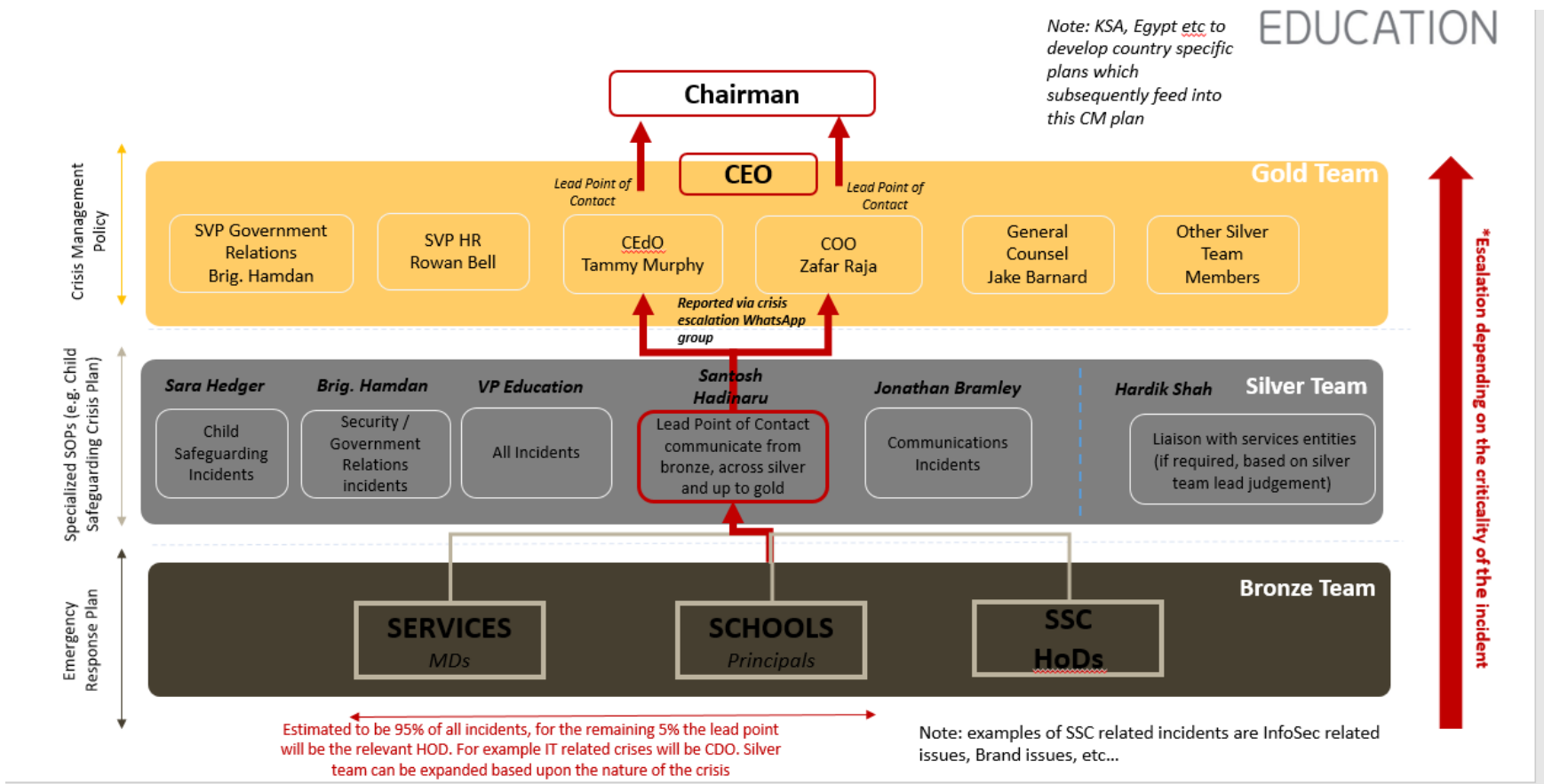
7. Staff awareness and training

The owner of this policy is responsible to complete the following:

- Ensure an identified staff member from the school's leadership team and the Manager of School Operations are provided with training relating to the procedures to follow.
- Ensure schools conduct emergency exercises related to fire and lock downs, as a minimum. Additional crisis scenarios will be tested, with subsequent school level exercises conducted.
- Plan and conduct an annual Gold and Silver level desktop exercise to test the procedures.
- Plan for and implement annual reviews (and ad-hoc, if need be) of the Crisis Management Policy, and ensure that the plan is kept updated. Ensure that post-crisis lessons learned are reviewed and incorporated into an updated crisis management plan.

8. Appendices

Appendix A. Escalation of incidents across the three levels



Appendix B. Three-tier response teams – roles and responsibilities

	Description	Team Lead*	*Team Members / Involved	*Additional Team Members / Informed	Examples of Previous Incidents
Bronze Team	Team who is the first responder on the scene; i.e. School level responders	Team Lead defined in the School ERP (e.g. School Principal in most cases) – deputy identified in ERP	Assigned Emergency Team members at the school	Cluster Leads CoEC- Tammy Murphy COO – Zafar Raja	ESM/ DBS (July 2018) NSG (Sep 2019) STS/KGS (Sep 2019)
Silver Team	Team responsible to coordinate, manage and act as liaison between Bronze and Gold teams; and ultimately responsible to declare incident as crisis	Santosh Hadinaru (HSE) – Deputy Sara Hedger	Silver Team Members (mentioned in previous slide) – deputy identified in crisis management policy	CoEC- Tammy Murphy COO – Zafar Raja	KGS (Apr 2019) STS/OOD (Sep 2019)
Gold Team	High level executives from SSC responsible for the strategic management of the incident when declared crisis	Dino Varkey (CEO) – Deputy Zafar Raja	Gold Team Senior Executive Members (mentioned in previous slide)	Chairman – Sunny Varkey	WEK (Jun 2019)

*Team Lead – Responsibilities are to act as a focal point of contact between different team levels, gather their team in case the incident justifies the need and transfer incident management responsibility according to the specialty area (e.g. Child Safeguarding incidents handled by Child Safeguarding Head – Sara Hedger)

Team Members Involved – Asked by the Team Lead to provide support

Additional Team Members Informed – Members other than the ones assigned for incident level, who are notified and kept in the loop of any updated about the incident for general information and if necessarily for advice/ recommendations

Appendix C. Silver Team Members

Department	Team Members
HSE (Silver Team Lead)	Key Person: Santosh Hadinaru Supported by: Sara Hedger
Child Safeguarding	Key Person: Sara Hedger Supported by: Kirsty Burns
Security / Government Relations	Key Person: Hamdan Alraisi Supported by: Aamir Bhukari
Communications	Key Person: Jonathan Bramley Supported by: Hfu Reisenhofer

Appendix D. Gold Team Members

	CMT Lead Members	CMT Replacement Members
Gold Team Members	Dino Varkey - Gold Team Lead	Zafar Raja
	Zafar Raja	Santosh Hadinaru
	Rowan Bell	Claire Hassard
	Tammy Murphy	Matthew Burfield
	Brig. Hamdan Alraisi	Aamir Bhukari
	Jake Barnard	Lee-Anne D'Aoust

Appendix E. GEMS Incident Reporting Scale

	Incident Criticality Level	Incident Descriptor	HSE	Communications	Child Safeguarding	Others
Gold Level	1	Matter with Public Interest Implications / Accident	<ul style="list-style-type: none"> Single or multiple fatalities or major injuries Major injury requiring hospitalization / permanent injury 	<p>An incident that sparks media interest and/or cause concern to the entire community.</p> <p>(ie. Death at a school, terror threat, fire at school, sexual harassment case)</p>	Child safeguarding/Child Protection incident leading to a catastrophic impact on brand reputation. This could include allegations against members of GEMS staff, volunteers or services.	<ul style="list-style-type: none"> Any event relating to fraud, corruption or bribery Law enforcement investigation into possible criminal activity by member(s) of staff
	Silver Level	2	Matter Not Affecting General Public / Accident or Significant Incident	<ul style="list-style-type: none"> Injury requiring external medical treatment. Non-permanent injury. 	<p>An incident that affects the school and the school community.</p> <p>(ie. A closure of a school, sudden departure of a principal/key staff, injury at the school, lapse of judgement resulting in an incident)</p>	Child safeguarding/Child Protection incident that requires external agency reporting and notification to the GEMS Head of Safeguarding & Child Protection (HoSCP).
Bronze Level		3	Incident	<ul style="list-style-type: none"> Minor injury that does not require any external medical treatment. 	<p>Something that impacts students, staff that could damage the school's reputation or the GEMS brand if not managed well.</p> <p>(ie. Minor incident at the school that is contained like a fire).</p>	A child-safeguarding incident that is reported investigated and managed by the school, that warrants only limited GEMS HoSCP involvement.
	4	Anomaly	<ul style="list-style-type: none"> Near miss incident 	<p>Something that could hurt the school brand and GEMS reputation.</p> <p>(ie. inappropriate material, minor accident, bullying)</p>	A child safeguarding incident that is reported, investigated and managed by the school, with no further actions being required and does not warrant involvement by GEMS HoSCP.	<ul style="list-style-type: none"> An information security breach or weakness which has minimal impact to GEMS MENASA and recovery can be scheduled to an appropriate time without negatively impacting the business function

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