

Crisis Management Policy

Policy Title:	Crisis Management Policy
Policy Number:	POLRM001
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Policy approver:	GEMS Risk and Compliance
Policy owner:	Health, Safety and Environment Risk and Compliance
Key Stakeholders	Education Safeguarding and Child Protection Health and Safety Communication Team Services
Policy reviewer:	Risk and Compliance Committee
Relevant related policies:	POLCSG 001V2 GEMS Safeguarding Policy IMS MGTO1 Personal Emergency Evacuation Plan IMS MGY02 Fire Safety IMS MGT09 First Aid IMS MGT10 Incident Reporting IMS MGT OHS Policy
Other relevant documents:	Emergency Response Plans

1. Central Policy Statements

- 1.1 The Crisis Management Policy (CMP) document outlines how our business will react if a crisis occurs. This document identifies who will act and what their roles will be. The goal of the crisis management plan is to minimise damage and restore business operations as quickly as possible.
- 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 our business will be supported by the GEMS School Support Centre towards managing these incidents.

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:
 - The scope includes all individuals employed 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
 - 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 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.
- 3.2 The CMP applies a team approach to emergency responses, with each team member given specific roles and responsibilities for responding on-site to an emergency. It also emphasises 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 any business unit, which is managed on site by the Emergency Response Teams (Bronze Level Team), all incidents are reported to the Silver Team Lead.
- 4.2 Silver Team Lead then communicates the incident and gathers the entire Silver Team members for review and further action, if need be.
- 4.3 Silver Team Lead takes the decision on escalating the event to the Gold Team Lead, or pushes back in case of non-criticality of the event (according to the incident reporting scale matrix, refer to **Appendix E**). A 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. Any decision should be supported by written communication and evidence papers as relevant (evacuation reports, statements etc.) with sign off/agreement from the respective stakeholders.
- 4.4 In the event of declaration of a crisis, the Silver Team Lead will contact and arrange a Crisis Management meeting, ensuring the crisis management process is well coordinated and followed effectively.

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 teams 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 organization's normal business operations to such an extent that it poses a threat.
- 5.2 Crisis: A critical event, that, if not handled in an appropriate manner, may dramatically impact an organization'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 minimize injury and property damage. Note: Every School will have their own Emergency Response document developed using the template / guidance provided by the central team.
- 5.4 Crisis Management Policy: A high-level overarching document containing guidelines and aligning different SOPs for dealing with and managing crises events.

6. Roles & responsibilities

- 6.1 Silver Team (or Crisis Coordination Team, (CCT)).
 - The team consisting of crisis areas specialists as key role players (i.e., Communication, HSE, Child Safeguarding) and the appropriate stakeholders responsible for coordinating and assessing the incidents;

- Responsible for assessing and classifying the incidents reported by the Bronze Team; and
- The HSE team remain responsible for training schools and BUs on the ERPs, auditing.

6.2 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 gaining the necessary approvals (such as KHDA, ADEK approval in instances of a school closure); and
- Support the Bronze team on ground by providing or approving all required resources and directions during 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.

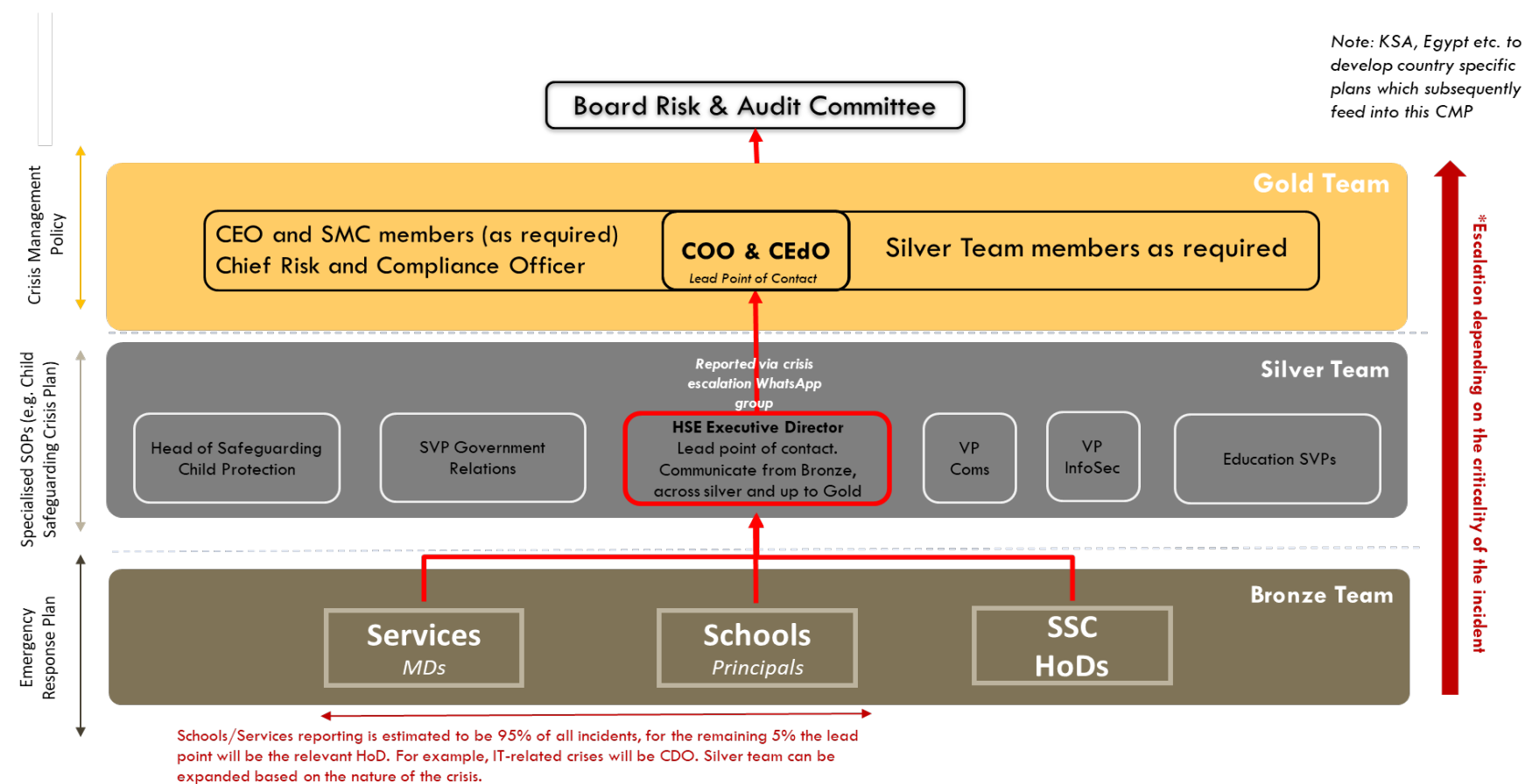
7. Staff awareness and training

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

- Conduct continuous training of stakeholders on their duties and responsibilities with respect to the Crisis Management Policy;
- 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. The update should also be aligned with the review and update process of the underlying SOPs;
- Ensure simulation exercises are being conducted annually and involving all related stakeholders and SOPs owners; and
- Ensure that post-crisis lessons learned are incorporated into future crisis response plans.

8. Appendices

Appendix A. Escalation of Incidents across the Three Levels



Appendix B. Three-Tier Response Teams – Roles and Responsibilities

THREE-TIER RESPONSE TEAMS RESPONSIBILITIES

	Description	Team Lead*	*Team Members / Involved	*Additional Team Members / Informed
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 as defined in the School Crisis Management Team	Cluster Senior Vice President
Silver Team	Team responsible to coordinate, manage and act as liaison between Bronze and Gold teams; and ultimately responsible to declare incident as crisis	HSE Executive Director Deputised by Group HSE Manager	Silver Team Members (mentioned in the previous slide) and defined in Crisis Management Policy	Services, as required
Gold Team	Senior Executives from SSC who are responsible for the strategic management of the incident when a crisis is declared	Chief Operating Officer Deputised by CEo	Gold Team Strategic Management Committee, Chief Risk & Compliance Officer	Board Risk and Audit Committee

***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 speciality area (e.g. Child Safeguarding incidents).

Team Members Involved: Requested by the Team Lead to provide support.

Additional Team Members Informed: Members other than the ones assigned for the incident level. Informed and updated and if necessary for advice/ recommendations.

Appendix C. Silver Team Members

Department	Team Members
HSE (Silver Team Lead)	Key Person: Executive Director - Health, Safety and Environment Supported by: Senior Manager - Health, Safety and Environment
Child Safeguarding	Key Person: Head of Safeguarding and Child Protection Supported by: Cluster Safeguarding Manager
Education	Key Person: Designated SVP Supported by: Cluster SVP
IT	Key Person: InfoSec VP Supported by: Designated IT Manager
Security / Government Relations	Key Person: Senior Vice President – Government Relations Supported by: Managing Director - Safecor
Communications	Key Person: Vice President - Communications Supported by: Senior Manager - Communications

Appendix D. Gold Team Members

	Lead Members	Replacement Members
Gold Team Members	CEO	COO
	COO – Gold Team Lead	
	CEdO – Gold Team Lead	
	CRCO	
	CPO	VP HR
	CDO	VP InfoSec
	GC	VP Legal
	Silver members, as required	

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