



GEMS Health and Safety Policy



Document Title:	GEMS Health and Safety Policy
Document Number:	HSE-POL-00
Version:	4.0
Effective Date:	August 2025
Scheduled Review Date:	August 2027
Policy Reviewer:	Head of Health, Safety and Environment
Policy Approver:	Board Risk and Audit Committee

1. Purpose and Scope

1.1 Purpose

The purpose of this *GEMS Health and Safety Policy* is to outline the GEMS approach towards preventing injury, illness and environmental harm; complying with all applicable health and safety related laws, regulations and standards; and promoting a culture of continuous improvement in health and safety performance with a focus on setting industry best practice. The *GEMS Health and Safety Policy Statement* acts as a clear, high-level commitment statement that publicly expresses the leadership's intent, priorities, and expectations.

1.2 Scope

This policy applies to all GEMS schools and corporate departments, including all staff, students, contractors, and visitors engaged in activities under our control. It covers all locations, facilities, and operations managed by the organisation – including GEMS School Management. GEMS service entities (Threads, ESM, Slices, Safecor, and STS) manage their own health and safety policies.

2. Roles and Responsibilities

A comprehensive outline of health and safety responsibilities is included in the *GEMS HSE Roles and Responsibilities Policy (HSE-POL-19)*.

The responsibilities listed below relate specifically to this *GEMS Health and Safety Policy* and the *GEMS Health and Safety Policy Statement* and are key to ensuring their successful implementation across the organisation.

2.1 GEMS Risk and Audit Committee

- Enacts corporate governance and oversees the effective implementation of this policy.
- Ensures that the GEMS health and safety framework aligns with organisational goals by reviewing and approving significant changes to the health and safety policies, where relevant.
- Ensures the HSE function is adequately resourced and empowered via the Chief Risk and Assurance Officer.
- Monitors performance through key health and safety metrics and reports.

2.2 GEMS Chief Executive Officer (CEO)

- Holds ultimate responsibility for the effective implementation of this policy across the organisation.
- Takes all reasonable steps, including allocating adequate resources, to ensure implementation of this policy.



2.3 GEMS Head of Health Safety and Environment (HSE)

- Responsible for developing and maintaining the standards, processes, guidelines and internal controls within the GEMS health and safety framework that support the implementation of this policy.
- Ensures regular review of this policy and its related documents and processes.
- Provides assurance to the GEMS CEO via the GEMS Risk and Audit Committee on implementation, gaps and opportunities related to the implementation of, and compliance with, this policy.

2.4 GEMS HSE Team

- Communicates this policy to all GEMS employees, and ensures it is made available via the GEMSnet portal.
- Ensures alignment between the policy and supporting documentation within the HSE Management System.
- Monitors implementation of the policy across GEMS operations to ensure it's consistently applied.
- Reviews and updates this policy periodically to reflect changes in regulations, organisational structure, and risk profile, ensuring it remains current and effective.
- Gathers feedback and insights from audits, incidents, and stakeholder input to inform continuous improvement of this policy and related health and safety practices.

2.5 School Principals

- Hold ultimate responsibility for implementing this policy in their school and related activities.
- Ensure the policy is communicated to all school staff and shared with relevant external stakeholders.
- Allocate adequate resources to enable their school to meet its health and safety obligations and objectives.
- Foster a sense of shared responsibility for health and safety across the school.
- Ensure that their staff are provided with adequate and appropriate health and safety information and training, are competent in safety matters, and are allocated only tasks commensurate with their skill.

2.6 Corporate Heads of Departments

- Hold ultimate responsibility for health and safety in their department operations and any related activities.
- Ensure implementation of this policy in the departments and activities under their control.
- Ensure the policy is communicated to all their staff and shared with relevant external stakeholders.
- Allocate adequate resources to enable their team to meet its health and safety obligations and objectives.
- Foster a sense of shared responsibility for health and safety across their department.
- Ensure that their staff are provided with adequate and appropriate health and safety information and training, are competent in safety matters, and are allocated only tasks commensurate with their skill.

2.7 Employees

- Follow the principles and expectations outlined in this policy in their daily work and decision-making. Comply with procedures and responsibilities that directly support the objectives of the policy.
- Encourage others to uphold the policy, helping to build a positive and proactive safety culture in their team, department, and ultimately across the organisation.
- Report hazards, near misses, unsafe conditions, and accidents promptly to enable timely corrective actions.
- Participate in HSE-related training and briefings to understand how the policy applies to their role and work environment.
- Contribute to a safe and healthy environment by taking reasonable care of their own safety and that of others.

2.8 Contractors and sub-contractors

- Comply with GEMS Education health and safety policies and procedures.
- Monitor their own health and safety performance and that of their employees and sub-contractors.

3. HSE Framework

The GEMS HSE Management System (HSE-MS) is a framework that ensures effective management and improvement of HSE performance across the organisation. It brings together key policies, procedures, and supporting documents that enable us to identify, assess, and control risks, ensure compliance, and importantly, promotes a culture of HSE awareness and competence. The framework not only helps ensure compliance with all relevant regulations but also aims to go beyond minimum requirements and embed best practices across our schools and entities.

The system is built on four pillars: **Policy, Risk Management, Assurance, and Promotion**. The pillars are adapted from the Plan-Do-Check-Act (PDCA) cycle and ISO 45001 standards and provide a structured approach, while also remaining dynamic to allow for ongoing refinement and potential integration with other management systems such as environmental or quality management. The pillars and some key policies are outlined below.

Policy Leadership commitment & governance	- Health and Safety Policy - HSE Roles and Responsibilities Policy - Needs and Expectations Policy - HSE Objectives and Targets Policy - Legal and Other Requirements Policy - HSE Document and Record Control Policy
Risk Management Identification, assessment & control of risks	- HSE Risk Management Policy - Incident Reporting and Investigation Policy - Fire Safety and Evacuation Policy - First Aid Policy - Contractor Management Policy <i>Several additional policies are also in place to address specific risks and activities – some of which include Food safety, Allergy management, Adverse weather, Electrical safety, Working at height, Chemical safety, Noise management, Workplace violence, Legionella and water quality, Manual handling, Maintenance operations, Housekeeping and hygiene.</i>
Assurance Monitor HSE performance, ensure compliance & drive improvement	- HSE Audits and Inspections Policy - Measuring and Monitoring HSE Performance Policy - Management Review Policy - Management of Change Policy
Promotion Strengthen HSE through training, awareness, communication & engagement	- HSE Communication and Consultation Policy - HSE Committee Policy - HSE Training and Awareness Policy

The GEMS HSE Team will continue to review and update the framework on an ongoing basis, with all documentation managed in line with the [GEMS HSE Document and Record Control Policy \(HSE-POL-05\)](#).

4. References

4.1 Internal References

- HSE-POL-00 GEMS Health and Safety Policy Statement
- GEMS HSE Management System (multiple policies and supporting documents, as referred to in Section 3 above)

4.2 External References

- UAE Federal Law No. 8 of 1980 (Labour Law), Article 91
- UAE Ministerial Decision No. 44 of 2022
- ADOSH-SF Element 9 – Compliance and Management Review (July 2024)
- ADEK School Health and Safety Policy (Sept 2024)
- Qatar Labour Law No. 14 of 2004, Article 100
- Qatar Ministerial Decree No. 3 of 2004
- ISO 45001:2018 – Occupational Health and Safety Management Systems

5. Revision History

Version	Changes/Comments
1.0	Initial policy created and issued for use.
2.0	Updates made but changes not recorded.
3.0	Updates made but changes not recorded.
4.0	■ Renamed to Health and Safety Policy (removed "Occupational"). ■ Expanded scope to include application across GEMS corporate activities and GSM. ■ Updated role responsibilities to ensure accuracy, with broader HSE responsibilities moved to <u>GEMS HSE Roles and Responsibilities Policy (HSE-POL-19)</u>. ■ Added HSE framework section to provide context. ■ Updated references. ■ Developed standalone poster version of the policy statement, suitable for public display and sharing with external stakeholders.

6. Disclaimer

All intellectual property rights of this document including the copyrights are owned by Company and protected by international copyright laws. Any unauthorized use, distribution, transmission, alteration, or reproduction of this document, or any part of it, constitutes an infringement of the Company's intellectual property rights and may result in severe civil liability and criminal penalties, and will be prosecuted to the maximum extent possible under the relevant laws.

Appendix

A copy of the [GEMS Health and Safety Policy Statement](#) is included as an appendix on the following page.



GEMS Education

Health and Safety Policy Statement

At GEMS Education, we are committed to creating and sustaining a safe and healthy environment for all our people – our students, staff, contractors, visitors, and the broader community. We recognise that strong health and safety management is integral to our success and to the wellbeing of everyone involved in our operations.

We aim to embed safety into how we think, plan, and act. Every day, in everything we do. Specifically, we commit to:

- Comply with all relevant regulations and aim higher, setting benchmarks that reflect best practice across our industry.
- Invest in the tools, systems, and resources needed to deliver this commitment effectively across the organisation.
- Maintain and continually improve a robust health and safety management system, including clear processes to identify hazards, assess risks, and act early to prevent harm.
- Champion a positive proactive safety culture through visible leadership and accountability, and genuine care.
- Equip our people with the knowledge, skills, and confidence they need to take ownership of their own safety – and to look out for one another.
- Learn from incidents and ensure that appropriate corrective and preventive actions are implemented.
- Create open channels for consultation and collaboration, empowering staff and stakeholders to play an active role in shaping a safer workplace.
- Set smart, meaningful safety performance indicators, track our progress and use data to drive continual improvement.
- Regularly review health and safety performance, using insights to shape decisions and strengthen outcomes for our people and our communities.


Dine Varkey

Chief Executive Officer



Cambridge International School

Health and Safety Policy and Procedures

NAME OF POLICY	Health and Safety Policy and Procedures
APPROVED BY	Principal
DATE APPROVED	September 2025
DATE OF REVIEW	Updated 2025 Next projected review 2027
RELATED POLICIES	CIS Fire Evacuation Policy and Procedure CIS Lock Down Policy and Procedure CIS Medical Policy and Procedure CIS Educational Excursions and Events Policy

Rationale:

All employees have a duty to work in a safe and responsible manner, to carry out their duties in such a way so as not to endanger the health, safety and welfare of themselves and others and to submit suggestions for the improvement of standards in health and safety within the school to the heads.

The school's operations are conducted in such a manner as to ensure as far as reasonably practicable, the health, safety and welfare of all the school's employees and any other persons who may be affected by its acts or omissions, including children, contractors, visitors and members of the public.

Adequate resources are made available for the provision of health, safety and welfare within the workplace, including the provision and maintenance of equipment.

Suitable and sufficient training is given. Full use is made of any guidance and/or training available either in-house or through the trade associations, professional bodies, manufacturers and suppliers of equipment and others as appropriate.

Where and when necessary, appropriate protective clothing and equipment must be provided by the school and used by all employees and children.

Any member of staff who is found to be deliberately or consistently negligent in the performance of their duty with relation to the school's health and safety policy will be subject to disciplinary action.

The school health and safety policy is reviewed annually and presented to staff at the beginning of the academic year. New staff must be made aware of the policy as part of their induction. Visitors, those hiring the premises and children must be made aware of their responsibilities and the health and safety procedures that affect them. **Notices must be displayed indicating evacuation procedures.**

Aims

- To provide and maintain a safe and healthy environment throughout the school site and safe means of access and egress from it
- To establish and maintain safe working practice and procedures amongst staff, children, volunteers, those hiring the premises and all those on the school site
- To ensure safe measures of using, handling, storing and transporting articles and substances.
- To provide safe systems for the control of noise, toxic and corrosive substances, dust and vapours under the school's control
- To provide information and training to enable everyone to contribute positively to their own safety and that of others
- To formulate effective procedures for use in case of fire and other emergencies and for evacuating the school premises
- To lay down procedures in case of accidents and medical treatments
- To provide guidance on the use of school and company vehicles

Responsibilities of the School Principal and Manager of Facilities

To:

- bring the contents of this policy and associated documentation to the notice of all members of staff and make arrangements for the regular review and monitoring of this policy and the arrangements and procedures contained herein
- ensure that there is a school health and safety committee responsible for monitoring the HSE Policy, procedures, risk assessment and actions. Minutes of these meetings must be kept with actions recorded
- ensure that accidents and injuries are recorded in the accident book and Incident Reporting Module, GEMS Health and Safety
- carry a mobile phone and ensure that office staff always know the whereabouts of the Head / person in charge of the school (MSO) / SLT

- ensure suitable and sufficient risk assessments are carried out. These assessments must be recorded in writing and brought to the attention of all appropriate employees. A person must be trained to carry out the assessment to ensure that they are suitable and sufficient
- ensure that there is at least a termly fire drill and a record kept of the date, time and length of time taken to evacuate the building and account for all persons
- ensure that adequate resources, financial and otherwise, are made available for the provision and maintenance of health, safety and welfare within the school
- appoint responsible persons to co-ordinate the actions of staff and children in case of fire
- ensure that there is an emergency plan and that suitable arrangements are in force and adequate equipment made available for dealing with emergencies. S/he will also ensure that sufficient competent persons responsible for evacuation of the premises in the event of such an emergency have been appointed and their identities made known to all other staff and children
- identify and make arrangements for training all staff. This includes induction of new employees and where necessary, retraining of existing staff
- consult with safety representatives, members of staff and others, where necessary on matters of implementation and review of this policy and procedures contained herein
- investigate and report all accidents, injuries and near misses via to GEMS Corporate Office
- ensure that all manufacturers and suppliers provide information on any dangerous substances and hazardous processes used on the school site and that this information is made available to all users, and persons exposed to the hazard
- designate and monitor the performance of staff with responsibility for supervision, training and the day-to-day implementation of this safety policy and the procedures contained herein

Responsibilities of Key Health and Safety Personnel

The Principal is a member of the school's health and safety committee, responsible for advising on health and safety, monitoring and reviewing of procedures and suggesting revisions to the policy, as required. The Manager of School Facilities (MSO) is responsible for weekly and termly site inspections to address any health and safety issues including:

- display of statutory notices
- accident reports and near misses
- risk assessments
- site tour report
- training needs
- reported health and safety maintenance needs
- vehicle compliance
- compliance with health and safety checks (water, fire, electricity, gas and pest control)
- site security
- school visits and fixtures
- performance and events
- fire drill, lock down and emergency procedures

Responsibilities of Staff

The school has a 'duty of care' to all children. This includes providing 'adequate supervision' during arrival and dispersal at the beginning and the end of the day. Staff must have access to emergency contact details at all times. Such details must be available in printed form as well as electronically in case of system failure. Clarity must be obtained with regard parental rights of access if there is any dispute.

The Principal is responsible for ensuring that duties are organised to ensure the safety and well-being of all children. The Principal is responsible for the duty timetable and rotas and for ensuring the correct ratios of staff at all times.

All staff are responsible for maintaining good health and safety practices. Heads of Department / Faculties / coordinators are responsible for ensuring that there is a specific health and safety section in

their departmental handbook / policy. They must ensure that staff within their teams and other adults working with them are properly trained, having regard to the hazards of the activities involved. They should also advise the Principal / Manager School Facilities / Admin Officer, of any requirements for the health and safety of staff and children including the reporting of faculty equipment and training needs.

Staff must ensure that fire exits are unlocked and free from obstruction. All areas under their supervision or control must be kept in a clean and tidy manner and any articles or substances therein properly stored, clearly labelled and used in a manner not likely to result in harm. They are responsible for reporting all accidents to the Principal / Manager School Facilities (Annexes 9).

The Manager School Facilities / Admin Officer is responsible for checking the site and ensuring that fire exits and the alarm system are operational at all times.

All areas including storage areas must be kept tidy particularly ensuring that the aisles and exits are kept clear. The furniture must be arranged so that the need to move safely around is taken into account. Staff must position themselves so that they have maximum vision of the children at all times.

All materials and tools must be stored safely. The tops of cupboards must not be used for storage. At the end of each year all drawers and cupboards must be cleared / tidied and equipment appropriately washed/cleaned.

Any spillages must be cleared up immediately. Toner cartridge spills must be cleaned up with a dust pan and brush as the particles can pass through a vacuum cleaner filter and in to the air.

Children must wear protective clothing and be taught how to safely use scissors and tools. Only low melt glue guns and non-toxic paint to be used.

Performances and Events (refer to CIS Educational Excursions and Events Policy)

A risk assessment must be carried out and appropriate action taken for all performances and events. Any recommended limits for fire safety must be adhered to.

Health, Safety and Emergency Procedures

Accidents

All accidents to both staff and children / visitors / members of the public must be recorded and reported to the Principal / Manager School Facilities who will report to Corporate Security Advisor via the Phoenix Guard- HSE. (Refer to Annex 9, Accident and Injury Reporting Form). **Serious accidents and injuries must be reported directly to the Corporate Security Advisor.**

Records of accidents must conform to the requirements of the Data Protection Act and be recorded in the accident book. The school nurse is responsible for managing the accident book.

In the case of adults, accident forms must be completed either by the injured person or someone acting on the injured person's behalf.

Work experience trainees are classified as 'employees' under Health and Safety legislation.

A copy of the form should be placed in the injured person's file (either child or staff) or to a separate file for non-employees.

The original form must be kept in the school's central file in the main office and a copy given to the Manager School Facilities.

Deaths, major injuries to employees and injuries where non-employees are taken to hospital and dangerous occurrences must be reported to the Health and Safety Executive (HSE) via the GEMS Corporate Security Advisor. These include:

- fatalities
- major injuries – defined as fracture other than to fingers, thumbs or toes, amputation, dislocation of the shoulder, hip, knee or spine, loss of sight (temporary or permanent), chemical or hot metal burn to the eye or any penetrating injury to the eye, injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring admittance to hospital for more than 24 hours.
- Any other injury leading to hypothermia, heat related illness or to unconsciousness; requiring resuscitation or requiring admittance to hospital for more than 24 hours, unconsciousness caused by asphyxia or exposure to harmful substance or biological agent, acute illness requiring medical treatment, or loss of consciousness arising from absorption of any substance by inhalation, ingestion or through the skin, acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.
- Accidents and incidents that happen in relation to curriculum sports activities and result in children being killed or taken to hospital for treatment are reportable.

Labour Law (injuries and deaths)

The school must report injuries and deaths and occupational diseases that occur during or because of the work based on the labor law and ministerial decisions

Sanctions of not reporting

- 1 - Fine of 10 000 dirhams for each case
- 2 –Block establishment.

The definition of worker injury: Worker is exposed to an accident at work or because of resulting damage to the worker.

The definition of occupational disease: Injury or one of the occupational diseases mentioned in the labor law which result from exposure to physical or chemical agents which are dangerous physiologically or harmful to health, which could lead to death or chronic illness.

Cases of injuries must be reported

The employer must report injuries caused by the idleness factor for his work three days and more during the 24-hour requirement

Check the following:

- Occurrence of injury at work or because of work
- Incidence of injury while going for work from his residence or vice versa
- Incidence of injury during his travels by the intention to perform the task entrusted to him by the employer
- Developing any of the occupational disease mentioned in the table of labour.

Procedure for the submission: Email to wis@mol.gov.ae or call 800 665 (8.00am to 10.00pm)

Or visit the main building of the Ministry with below details:

Worker's name:

Establishment Name:

Establishment number:

Date of the injury:

Contact:

Number:

Allergies (Refer to School Medical Policy and Procedure)

Children must NOT bring any food or drink (including Birthday cakes and treats) onto the school site unless there has been medical permission given e.g. in the case of diabetes. Aerosol cans must not be brought on site.

Contractors and Trades People

Contractors and trades people involved in repair, maintenance or installation work which involves the building, grounds or other Operations must provide written or other evidence of their competence to complete such work including relevant industry qualifications (Gas Safe Register etc).

Contractors / trade people visiting the site to quote for work must be accompanied onsite by a relevant person

Once a contract has been agreed the contractor must ensure that:

- employees have been made aware of the school's health and safety policy and that work can proceed safely without risk to health
- employees comply with the visitors' section of this policy
- employees and external contractors are not exposed to hazardous conditions
- employees do not cause hazardous conditions for others
- compliance with legal requirements

Electricity (Mains)

It is strictly forbidden for any work to be conducted on any live electrical circuits by any member of staff or child within the school.

Any work of an electrical nature on any conductors or circuit must be carried out only by competent staff and qualified electricians.

All installations and electrically operated tools and equipment must be maintained in good order and subject to regular inspection and testing as appropriate by a competent person. A record of such testing must be kept by the [Manager School Facilities].

If any item of electrical equipment fails to function properly the user must immediately report this to the MSO. On no account must amateur fault-finding be attempted, even after switching off and disconnection from the power supply.

The only time a machine can be opened is when clearing a paper jam on a photocopier or a printer. In such instances the power must be switched off, the machine unplugged and the manufacturer's instructions followed.

Emergency Procedures and Lock Down Policy (See Lockdown Policy)

Emergency Procedures Plan (See Fire Evacuation Policy)

Fire Procedures (refer to school Fire Policy and Procedure)

Fire Instructions

50% of staff are required to complete the fire safety training. It is the duty of all members of staff to do all in their power to prevent injury and loss of life in the event of a fire. Salvage of the building and equipment is of secondary importance.

First Aid and Medication (Refer to School Medical Policy and Procedure)

Food Handling (Refer to School Medical Policy and Procedure)

Hire of Facilities

The Principal / MSO is responsible for giving a copy of the school's Health and Safety Policy to hirers. The hirer has responsibility to ensure that individual leaders comply with the school's health and safety policy.

Regular hirers are required to produce their own health and safety procedures based upon the school policy. A copy of the individual procedures must be submitted to the named person and filed with the letting documentation.

Regular hirers must conduct a termly fire drill in liaison with the site manager. Hirers are required to provide their own mobile phone for emergencies.

In the case of an emergency, hirers must contact the emergency services using 999 and then contact the site manager. The site manager will then contact the Head.

- Children must be supervised at all times whilst on school property. Those in charge of children are responsible for ensuring that they behave sensibly and that activities are controlled and well managed.
- Sliding on the floors or climbing on any equipment is not allowed.
- School equipment is not to be used by the hirer without prior agreement.
- Tables, chairs etc. must be returned to their original position. If tables and chairs are provided they must be wiped and returned in the condition in which they were found.
- Child's trays and personal belongings must not be touched nor items on or in the teacher's desk.
- Care to be taken not to damage wall displays, fixtures and fittings e.g. if using a ball.
- The hirer will be charged for any damage to the school or school property that occurs during a letting.
- Hirers need to ensure that they have adequate and current insurance (A copy of the hirer's insurance certificate to be kept on file).

Security During Lettings

Doors must be closed or supervised during the letting period. It is essential that members of the general public cannot gain access to the school at these times.

Those responsible for the letting must not leave the premises until the key holder arrives to lock up and assume responsibility for the security of the building.

Machinery and Equipment

Machinery and electrical items must be checked at least once a year and recorded in the 'Machinery and Electrical Equipment' section of the school inventory.

All machinery and equipment within the school must be maintained in good working order at all times, or otherwise clearly marked by provision of suitable fixed notices, to indicate when such machinery or equipment is unfit for use.

It is the responsibility of staff when using equipment to check for obvious signs of damage and report any defects found.

Boilers, lifts, portable appliance testing, emergency lighting, hot water system, stored cold water system, fresh air systems (including air conditioning), fire alarm & firefighting apparatus, intruder alarm, CCTV, sprinkler systems are to be tested and certified at least annually.

The mains wiring, Fixed wiring; including fuse boards are tested every 5 years unless alterations are made to the circuits.

Full and suitable assessments must be made of the hazards and risks involved in the use of all machinery and these must be recorded, along with arrangements for the scheduled servicing, lists of authorised users and training records.

Clear guidelines must be drawn up for the acquisition of new equipment to ensure that it complies with current legislation and best practices. Care must be taken over the use, installation or siting of such equipment.

All purchases and gifts must be reviewed to identify potential hazards. Each new purchase or gift must be monitored and its use reviewed in terms of its safe operation.

Manual Handling and Lifting

The risk of injury, due to the manual handling of loads, must be recognised by the school and all measures taken as necessary to reduce such risks through individual risk assessments.

Training in proper handling techniques must be given, as appropriate, and only those persons so trained must be asked to move heavy weights. Under no circumstances should children be allowed to lift or move heavy or awkward weights.

Materials and Hazardous Substances

The use of any material or substances within the school is subject to prior assessment. A named person is responsible for storage records of materials and hazardous substances.

Procedure:

- undertake assessment of all hazardous materials with respect to usage and risk;
- assemble comprehensive hazard data information;
- arrange appropriate training;
- Instigate control measures through:
 - hazard training records
 - hazardous materials storage records
 - methods for the elimination / reduction of risk
 - high standards of supervision
 - issue of personal protective equipment (PPE)
- make arrangements for ensuring that copies of all relevant information are readily available to users of hazardous materials;
- make arrangements for the issue and use of PPE, including checking, maintenance and training, as appropriate.
- Storage records of materials and hazardous substances are held with Manger School Facilities and duplicated at individual sites.

Personal Protective Equipment (PPE)

Protective clothing and equipment, which conforms to the British / European standards, must be issued and used whenever processes and systems at work present a hazard which cannot be satisfactorily controlled by other reasonably practicable means. All PPE will be regularly inspected and kept in good order. Staff and children must be trained in the correct selection, wearing and use of PPE. It is the responsibility of all staff and children to wear such PPE as required, using it in the proper manner, and reporting any defects immediately. Records of the issue and maintenance of all PPE must be kept and its use monitored as part of the ongoing risk assessment process

Protective Clothing

Appropriate protective clothing must be worn by staff, children and others involved in activities which could lead to entanglement, be subject to harmful liquid spillages, or high temperatures including naked flames.

In areas exposed to high temperatures and naked flames overalls must be of an appropriate type of material. Protective clothing made from synthetic fibres must not be used unless supplied specifically for the purpose.

All aprons and overalls must be cleaned every week.

Eye Protection

It is a requirement to wear eye protection when an assessment shows that a risk of injury which cannot be otherwise eliminated exists.

Staff and children must wear eye protection when involved in any of the following operations:

- using or dispensing liquids which could cause injury
- when breaking, cutting, dressing, carving, stone, metal and glass
- any other process involving the production of fine particles
- any work which involves the use of sharp pointed materials

Eye protectors must be readily available, well maintained and carry the relevant code for the type of protection offered.

Hand Protection

Suitable hand protection must be worn whenever the relevant risk assessment indicates e.g. rubber gloves must be worn when washing items in hot water or when using certain cleaning agents. Ribbed or similar gloves must be used when a risk of injury from the handling of sharp abrasive objects is present.

Ear Protection

Suitable ear protection must be worn whenever the relevant risk assessment indicates the need for them.

Recreational Areas, Adventure Playgrounds and Safety Surfaces

- All apparatus / equipment must be kept in good working order
- All apparatus / equipment must be inspected on a monthly basis
- A log of these inspections must be kept by Manager School Facilities person

Procedures

A risk assessment on the use and supervision of each piece of apparatus / equipment must be drawn up, the control procedures to be adhered to at all times.

Children must be reminded that while using the facility they should respect the needs of others. Children must be alerted to the need to recognise faulty equipment and report immediately.

Safe surfaces, of the correct level of absorbency for the height of the equipment, must be installed below and around each item of equipment from which children could fall.

Risk Assessments

Risk assessment is defined as a systematic method of:

- analysing work activities;
- identifying: hazards, hazardous situations and hazardous events;
- estimating risks: by considering the likelihood of hazardous events occurring and the nature and severity of the subsequent harm / damage;
- deciding upon possible control options and action priorities;
- judging the 'acceptability', or, 'tolerability' of the risk.

Definitions

Hazard : Something with the potential to cause harm/loss. The potential to cause harm including ill health and injury, damage to property, plant, products or the environment.

Risk : The potential or the likelihood that harm will actually occur from exposure to the hazard together with the likely injuries that will occur as a result and the likely numbers of people that this will affect

The Principal / Manager School Facilities is responsible for:

- ensuring that risk assessments are carried out by competent persons;
- ensuring that the employees carry out suitable and sufficient risk assessments of all work areas including all lessons and activities;
- ensuring that advice on relevant legislation is made available to employees;
- ensuring the provision of adequate resources to implement necessary control measures identified in the completed assessments;
- ensuring contractors working on the premises have completed health and safety risk assessments covering activities that they propose to undertake, and that a copy is reviewed by a competent person to ensure that it is suitable and sufficient.

The Manager School Facilities is responsible for:

- undertaking, coordinating and updating health and safety risk assessments, including ensuring that they are documented, and action plans developed and implemented;
- ensuring that information obtained from the assessment such as control and safety procedures are communicated to those working in the area covered by the assessment;
- maintaining a risk register of assessments carried out.

All Heads of department / Faculties / Co-ordinators and Managers are required to complete risk assessments for the area(s) they are responsible for. Risk assessments must be completed prior to all educational visits including external sports fixtures

The amount of effort placed into health and safety in the workplace should be based on the risks associated with the work, with the greatest effort being placed into controlling those work activities that create the greater risk.

Consideration should be given to the following:

- description of work
- work location
- previous accidents / incidents in the area
- existing work practices
- existing controls
- non-typical events within the work area
- groups of people within the work area:
 - employees
 - trainees
 - young persons
 - contractors
 - members

- visitors
- particular attention should be paid to the following:
 - staff with disabilities
 - new or expectant mothers
 - trainees or temporary staff
 - lone workers
 - young persons
 - Inexperienced and new staff
 - cleaners
 - visitors

The assessment must include confirming that there is adequate insurance cover for the activity.

Risk assessments should be specific to individual work activities; ideally, they should also be site-specific to ensure that all risks are adequately assessed at each work location. If the work activities are similar, generic risk assessments may be carried out e.g. cleaning, office work, a single activity that occurs at several locations.

If generic assessments are used, they must be valid for the work activities to which they apply. In order to achieve this, the following points should be observed:

- the assessment must represent the particular activities at all relevant locations, or the worst case scenario should be assessed
- there should not be any significant deviations from the assessment
- the assumptions on which the assessment is based should be recorded, such as the safe working procedures detailed in the health, safety and environmental policy statement that all work locations follow
- the control measures that are in place should not deviate from that on which the assessment was based

Site Security

All staff must be alert to the need for security including ensuring that the gates and boundaries are secure. Door entry codes must be changed at least termly and all exterior doors kept closed. Windows must be closed at the end of the day or if a downstairs room is vacated.

Visitors must be kept separate from children; report to the school office immediately on arrival; sign in; receive a visitor's badge. The signing in book should have: date; name of visitor; whom they are visiting; vehicle registration.

Every visitor is informed of the following:

- identification badges must be worn at all times
- leave the building by the nearest exit if the fire alarm sounds and go to the fire assembly point
- the school operates a 'no smoking' policy
- all accidents must be reported to the school office and an accident form completed
- the location of first aid Operations
- that visitors are not permitted into classrooms or teaching areas unless a member of staff is present
- that children will only be released to adults where authorisation has been authenticated
- visitors must sign out before leaving the premises

Any person (other than a member of staff or child) on the school site and not in possession of a security badge must be challenged by an adult and, if necessary, asked to leave. Children must not challenge people without badges but must immediately inform a member of staff. Notices must not indicate the names and locations of children.

Employees are required to wear name badges and to sign in and out of the main office. The visitor book and staff register must be checked to ensure that all staff and visitors are accounted for in cases of emergency evacuation.

Smoking

Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace. This includes company vehicles. This policy applies to all employees, consultants, contractors, customers and visitors.

All staff are obliged to adhere to, and support the implementation of the policy. Any concerns employees may have regarding smoking at work should be reported immediately to the head so that corrective action can be taken if necessary.

Appropriate 'no-smoking' signs must be clearly displayed at the entrances to each school. All visitors, temporary staff, contractors and customers are expected to abide by the terms of the Smoking Policy and employees should tactfully remind visitors of the policy, if necessary. Local disciplinary procedures will be followed if a member of staff does not comply with this policy and, in the case of repeated offences, may be dismissed from the organisation's employ. Those who do not comply with the smoke-free law may also be liable to a fixed penalty fine and possible criminal prosecution.

Stress in the Workplace

Workplace stress is recognised as a legitimate problem affecting staff and one which needs careful and sympathetic management.

It is recognised and accepted that undue stress can lead to adverse effects on the emotional and physical well-being of staff and consequently to the efficiency of the organisation as a whole.

Whilst individual reactions to stress vary widely, the need to recognise and act upon potentially stressful situations is essential. Regular consultations with members of staff and discussion groups is to be encouraged in order that a pro-active approach may be taken on a continuing basis, in order that such situations may be avoided or their effects upon staff reduced.

Major changes within any organisation can be stressful and therefore members of staff should be appropriately informed of any major changes in so far as they may affect their own activities.

Members of staff are encouraged to seek advice from management regarding any situation they feel is causing them undue stress.

Transport Management for School and Company Vehicles Drivers

Children must be separated from areas where vehicles move and park. Drivers must observe the speed limits and parking restrictions.

Drivers employed or hired by the school must be over the age of 21, have held a valid full UAE license for a minimum of two years and be CRB checked. Where required, they must also have passed the Passenger Carrying Vehicle Test. Copies of these documents must be kept on file. Before any person drives a company vehicle, they must supply the Manager School Facilities with an original copy of their driving license.

Drivers must notify the Manager School Facilities of any changes to the status of their including all endorsements, bans and health defects within seven days of issue. Drivers must make their license available for verification as requested, but not less than quarterly. Alcohol must not be consumed by

the driver at least 12 hours prior to driving. Drivers must not drive if they feel tired or unwell, or taking a course of treatment which advises against driving.

School Vehicles

The MSO is responsible for ensuring that all school vehicles are serviced, have all valid documents and certifications fulfil the regulatory requirements of the governing authorities.

A full risk assessment is required prior to any journey using a school vehicle. Before driving school transport and at the end of the journey, the driver/designated person must carry out a full vehicle check covering:

- seat belts
- mirrors
- condition of all windows
- door locks
- lights, side and main beam
- indicators
- hazard and brake lights
- screen wipers and washers
- horn
- first aid kit
- fire extinguishers
- driving controls
- emergency exit operation and access
- tyre pressures and tyre condition including spare
- toolkit
- personal protective clothing for adverse weather conditions

Any damage or faults should be recorded in writing as well as any incidents during the journey. These should be reported to a named person responsible for ensuring that these are dealt with immediately.

In the event of a breakdown the driver should try to move the vehicle off the carriageway (onto the hard shoulder of the motor way). If it is not possible to move the vehicle off the carriageway then it should be moved as far away from the traffic as possible. On motorways and other busy roads passengers should be taken as far from the traffic as is practicable. They should be kept together in one group. Children should be kept calm and under constant supervision.

The mobile phone should be used to inform the emergency services and the school.

During a journey:

- seat belts must be worn at all times
- gangways must not be blocked with luggage
- no passenger to enter or leave by the rear doors unless a member of staff is present
- no portable tank containing fuel must be carried
- the ratio of adults to children must be appropriate to ensure adequate supervision and safety
- breaks must be taken by the driver at least every four hours
- mobile phones must not be used whilst driving

Booster seats

- The law states that child restraints must be appropriate to weight. Children 3 years to 135cm (4ft 5 ins) MUST use the appropriate child restraint:
- baby seats for children up to 13 kgs birth to 9 -12 months
- child seats forward facing for children 9kgs to 18 kgs 9 months to 4 years
- booster seats for children up to 15 kgs from approximately 4 years old

- booster cushions for children from 22kgs from approximately 6years

It is not a legal requirement to use child restraints (eg child car seats or boosters) on a minibus, bus or a coach because they are designed for car seats and may not be suitable for a bus seat, GEMS policy is that school must only use minibuses fitted with seatbelts and that passengers must use them for all journeys.

Escorts

It is not a legal requirement to have an escort as well as the driver. A risk assessment is required to determine if an escort is required.

Insurance

The company policy covers drivers for school and company business only. Permitted Use A school vehicle may only be used for school business.

It must not be used for:

- competitive driving (e.g. racing, rallying, competitions or trials)
- pleasure, domestic or social use
- the carriage of passengers for payment

Accident, Theft or Damage

The driver must notify the Principal / Manager School Facilities within 24 hours of any accident theft or damage and by no later than 10:00 hours the following working day.

The driver has full responsibility for ensuring that the vehicle is always parked in a safe place paying due consideration to other road users and whenever possible, garaged.

Where damage to any company vehicle is identified as being due to the fault of the driver, and is not covered by insurance, the employee will be held responsible and required to personally pay for the damage.

Fines and Penalties

The diver is liable for any fines / penalties in incur whilst driving the vehicle.

Visual Display Unit Operation

Display Screen Equipment (DSE) regulations relate to computer workstations and any alphanumeric or graphic display screen including microfiche readers, calculators, cash registers, word processors as well as personal computers

The DSE regulations apply if:

- the user (employee or agency staff) habitually uses DSE as a significant part of their normal work
- the work activity depends on the use of DSE
- there is no discretion as to the use of the DSE
- there is continuous use of DSE for spells of an hour or more
- use is more or less the same daily

The recommended environmental factors for work in offices and ICT rooms are:

Noise	Light	Temperature
Up to 50 db (average)	300 + lux and 500 lux if used for evening classes.	At least 18 degrees centigrade (64.4f)

The school must use comfortable, suitable chairs which are adjustable for height, tilt and back support. The chairs must be adjusted by the operator in order to obtain:

- a straight back;

- horizontal upper legs;
- feet flat on the floor (for smaller / younger children a foot rest may be employed to make up for the gap between the feet and the floor;
- upper arms at right angles to the forearm / hands.

Work tables must be suitable in terms of height, leg room and space available for hands to effectively operate the keyboard. Those with physical disabilities must be provided with specially adapted work tables if this is deemed necessary e.g. cutting an insert into the work table for wheel chair access and/or lowering of the table height.

Regular changes in activity and/or short rests must be used to reduce eyestrain, muscle tension, stress and tiredness. Operators must stand up from their seats and walk around the room if they are involved in lengthy sessions working on a computer. A ten-minute break after sixty minutes' continuous screen work is recommended.

Waste Disposal

All waste produced must be disposed of to a licensed waste disposal site via a registered carrier. Waste storage areas are subject to a full risk assessment.

Investigating An Accident

The following is a guide for investigating an accident or incident.

Immediately restrict access to the place of the incident until the investigation has taken place. Inform GEMS Corporate Office Security Advisor. Gather any witnesses and obtain contact details if not employees.

Gather information about the incident including time, location of incident, witness statements, photographic evidence.

INFORMATION

This must include activity being carried out, time, date, location, if outside the weather conditions.

Above all, the name of any injured person and the detail of the injury, specific to the part of the body.

i.e. right hand third finger lower left back etc

Be mindful if an injury to an individual, what clothing was being worn, what footwear, if protective equipment was being used if required.

If the incident is RIDDOR reportable, ensure this report on line happens as soon as possible.

STATEMENTS

From any witnesses, showing witnesses Name and Contact details. Full, concise details need to be documented.

PHOTOGRAPHIC

Take photographic evidence, showing the area, equipment involved. If possible show some form of scale or measurement.

Post incident

Review procedures and amend if necessary any risk assessments. Copy reports and findings to GEMS Corporate

POLMED001 - ALLERGY MANAGEMENT POLICY

Policy Title:	GEMS Allergy Management Policy
Effective Date:	01 April 2026
Scheduled Review Date:	01 April 2028
Version number:	Version 3
Policy Owner:	Medical Directorate
Reviewed By:	Chief Risk and Assurance Officer
Approved By:	Risk and Compliance Committee

1. Purpose

1.1. The primary objective of this policy is to ensure a safe and inclusive environment for all students, staff, and visitors afflicted with allergies. Our goal is to minimize the risk of severe allergic reactions among individuals with known food and other allergies. This policy serves to offer guidance to our school medical and other teams on effectively managing cases related to food allergies. Through the implementation and adherence to this policy, we endeavor to safeguard the well-being and promote the health of our school community.

2. Scope

2.1. The scope covers all GEMS MENASA schools and includes students, employees, parents, guardians, vendors, activity providers, and visitors. It is applicable to all food and other allergens brought onto or provided within school premises, as well as any potential exposure to food and other allergens during school-related activities that are conducted in schools or off-site. This includes but is not limited to school trips, school celebrations, food technology classes and school transportation. This policy also extends to the management of non-food allergens such as animal dander (pets), henna, paint, pollen, etc.

3. Policy Statement

- 3.1. GEMS Schools cannot guarantee a completely allergen-free environment. However, we aim to prevent exposure to allergens, encourage self-responsibility among students, staff, and parents, and develop a robust emergency response in the event of a medical emergency. GEMS schools operate a nut-free environment, with nuts prohibited on all campuses. While complete elimination of allergen exposure cannot be guaranteed, proactive measures including shared responsibility, and clear communication between staff, students, and parents significantly reduce risk.
- 3.2. Mandatory allergen declaration is required for all food items supplied within schools, covering:
Crustaceans, peanuts, soy, tree nuts, sesame, fish, eggs, milk, gluten, sulphites, molluscs, lupine and their products.
- 3.3. For non-food allergens, risk assessments and control measures must be implemented where potential exposure exists (e.g., outdoor activities with risk of insect bites and, the use of latex gloves and other equipment in laboratories and clinics).

4. Definitions

- 4.1. **Allergies** are abnormal responses of the human body's immune system to certain types of food or one of its components or other stimuli, which the body recognizes as harmful and develops a reaction, that varies in severity from person to person.
- 4.2. **Anaphylaxis** is a severe, life-threatening allergic reaction requiring immediate intervention and activation of emergency response pathway.
- 4.3. **Food intolerance** is the inability to digest or absorb certain foods. For example, a person with lactose intolerance does not have enough of the enzyme lactase to break down the sugar (lactose) in dairy products.
- 4.4. **Allergy Action Plan** is a physician-approved plan detailing recognition, management, medication prescription, administration, and emergency escalation.
- 4.5. **Individualized Healthcare Plan (IHP)** is a comprehensive plan for caring for children with special health care needs, developed by the certified school physician in collaboration with the student, parents/guardians, school staff, community, and healthcare provider(s), as appropriate. It should be updated each academic year or whenever required.

5. Roles and Responsibilities

Parents/Guardians

- 5.1. Review the policy for food allergy management and understand the responsibilities and expectations outlined in this document.
- 5.2. Share information regarding the student's medical condition, by providing written medical documentation, instructions, and medications as directed by their family physician, as well as emergency contact information.
- 5.3. Provide the school with their current/updated contact information (mobile phone, email, including emergency contact).
- 5.4. Work with the school medical team to develop a plan that accommodates the child's needs at school and provide a detailed allergy action plan from their treating physician. This plan should cover the child's entire school day, including time in the classroom, in the cafeteria, during after-school programmes, during school-sponsored activities, and while on the school bus.
- 5.5. Provide labelled medications in original packaging and replace medications after use or before/upon expiration along with the doctor's prescription.
- 5.6. Educate the child in the self-management of their food allergy including:
 - Recognizing safe and unsafe foods.
 - Knowing strategies for avoiding exposure to unsafe foods and various allergens.
 - Identifying and recognizing symptoms of allergic reactions early.
 - Knowing how and when to tell an adult that they may be having an allergy-related problem.
 - Knowing how to read food labels (age appropriate).
 - Knowing and remembering where their medication is kept, and who can administer it.
 - Knowing not to share snacks, lunches, or drinks and to politely explain why he/she is not sharing.
 - Understanding the importance of handwashing and hygiene.
- 5.7. Provide appropriate food for their children if they have a history of food allergies whenever there is an event at school (such as birthday parties, International Day celebrations, etc.), and ensuring they don't eat the food on offer to prevent a potential allergic reaction.
- 5.8. For birthday treats, end-of-term parties, etc. the food brought in by students must be individually packaged with the ingredients and allergen information

labelled. Please ensure the pre-packed items do not contain nuts.

- 5.9. Review the IHP with the medical team annually and provide updates and information as requested.
- 5.10. Timely updating newly appointed household staff regarding allergies when packing school lunches.

Students

Students with allergies are required and expected (within the limits of their age and understanding) to:

- 5.11. Have an age-appropriate understanding of his/her allergy and its triggers.
- 5.12. Take as much responsibility as possible for avoiding allergens, and not trade food with others.
- 5.13. Take responsibility for checking food labels and monitoring food intake, and not eat anything with unknown ingredients or known to contain any allergen and be aware of the probability of cross-contamination, based on their age and developmental level.
- 5.14. Be proactive in the care and management of their food allergies and reactions based on their developmental level.
- 5.15. Observe strict hygiene routines. Children should wash hands before and after eating to prevent cross-contamination of food.
- 5.16. Learn to recognize symptoms of an anaphylactic reaction.
- 5.17. Notify an adult immediately as soon as accidental exposure occurs or symptoms appear, or if they eat something they believe may contain the food to which they are allergic.
- 5.18. Familiarize themselves with the location of the nearest EpiPen (age-appropriate).

School Medical Team

- 5.19. Receive medical information (Ministry-related health and consent forms) from the enrolment department regarding any new student joining with medical conditions.
- 5.20. If receiving a student deemed high risk with significant medical allergies, arrange a meeting with the child's parents prior to school starting.
- 5.21. Request an allergy action plan from the treating doctor along with a prescription for medications.
- 5.22. Fill out an IHP for the student.
- 5.23. Ensure health information is updated in the child's medical file and school clinic database.

- 5.24. Clinic to ensure chronic illness and allergies register is up to date and shared with relevant staff members including school canteen, bus guardians, if the child is a bus user.
- 5.25. Share with all teachers and staff the locations of EpiPens in school so staff are aware of the nearest EpiPen in case of an emergency.
- 5.26. Receive participating student information from section heads two weeks in advance of the event/activity, so a list of all students with existing health conditions and special considerations can be shared by the clinic with the Educational Visit Coordinator (EVC)/event in-charge.
- 5.27. Nurses to ensure parents are reminded to provide a new EpiPen at least two months prior to expiry. Reminder communications are to be documented.
- 5.28. Ensure emergency first aid bags include both an EpiPen junior and EpiPen for adult are present on-site.
- 5.29. Be confident in the use of an EpiPen and early recognition of the signs and symptoms of anaphylaxis.
- 5.30. Provide EpiPen training to relevant staff including members of the Slices Team and Bus Guardians. This action is mandatory at the beginning of each academic year and when there is a new admission. A record of the training must be maintained at all times.
- 5.31. Map out locations of EpiPen requirements at the start of the academic year according to students' demographics and prevalence.
- 5.32. Provide Slices/Canteen team with the contact details of school clinic, so they communicate immediately any incidents of allergies that occurs during their service time.
- 5.33. The school clinic team should maintain a list of students who are allergic to certain foods and provide them to the school canteen so that they can avoid providing or selling these foods to students with allergies.
- 5.34. Provide an all staff training during orientation week on EpiPen use and recognition of signs and symptoms of severe allergic reactions.
- 5.35. Ensure a risk assessment is done for students with severe allergies and history of past anaphylactic reaction. Gauge the need for a "Break Glass If Needed – Emergency EpiPen Box" near the student's classroom, keeping in mind campus size, the distance from the school clinic and the location of the nearest EpiPen.
- 5.36. School Medical Team to use nitrile gloves only and not to use latex where allergies are present.

Class Teachers, Teaching Assistants, Food Lab Technicians and Staff

- 5.37. Be aware of students with food and non-food allergies within their classrooms or sections, including those with allergies to environmental and contact triggers such as pets, henna, pollen, insect stings, dust, latex, and fragrances.
- 5.38. Develop awareness of the signs and symptoms of allergic reactions, including severe anaphylaxis, related to both food and non-food allergens and attend the training provided by the school medical team.
- 5.39. Know who to contact for assistance and seek immediate help if a student reports or displays signs of a possible allergic reaction.
- 5.40. Be familiar with:
 - The location of the school clinic
 - Emergency contact details of the School Medical Team
 - The nearest trained First Aiders
 - The proper use of an EpiPen
 - The location of the nearest EpiPen
- 5.41. Be informed about the school's general first aid and emergency response procedures
- 5.42. Act promptly and without hesitation in implementing emergency response procedures if a student with known or suspected allergies reports symptoms of a reaction.
- 5.43. Establish procedures to ensure that students with all allergies, avoid all known allergens and those with food allergies consume only food brought from home or food that has been verified as safe.
- 5.44. Promote safe practices and precautionary measures for students with allergies, including:
 - Washing hands before and after eating or handling food
 - Consuming only food prepared at home or approved by parents/school
 - Not sharing or exchanging food and drinks
 - Remaining vigilant about hidden allergens (e.g., nuts in chocolate spreads or processed foods)
 - Being mindful of non-food allergen exposure, such as avoiding contact with henna, classroom pets, strong fragrances, or latex materials where applicable
- 5.45. Remind parents frequently of restricted food items, such as nuts and allergen-safe practices
- 5.46. Reinforce with all students the importance of proper hand hygiene before and after eating.
- 5.47. Where possible, allow students with allergies to retain the same locker throughout the academic year to minimize the risk of cross-contamination.

- 5.48. Notify parents and the School Medical Team in advance of any planned activities involving food, environmental exposure (e.g., outdoor activities during high pollen periods), or off-site trips.
- 5.49. Collaborate with the parents/guardians of students with allergies to plan appropriate risk management strategies for off-site activities, including transport arrangements where relevant.
- 5.50. Promote awareness among all parents and students regarding the importance of maintaining an allergen-safe environment, including both food and non-food allergens.
- 5.51. Attend any required allergy and anaphylaxis training sessions provided by the school medical team.
- 5.52. Declare any food or other allergies that the staff may have.
- 5.53. All Staff must adhere to this policy when bringing or packing food for personal use and they must not bring in nuts/food containing nuts onto school campus. Ensure compliance with allergen restrictions, prevent cross-contamination, and be aware of the nearest EpiPen location.

Manager School Operations (MSO)

- 5.54. Ensure effective communication and dissemination of this policy to all school staff.
- 5.55. Oversee and ensure compliance with this policy across all relevant areas, including canteens, kitchens, food technology laboratories, vendors, activity providers and the broader school environment, addressing both food and non-food allergens (e.g., pets, henna, pollen, dust, latex, and fragrances).
- 5.56. Nominate themselves and relevant team members for required training and certification as designated School Persons in Charge (PICs), in accordance with regulatory requirements, including training on allergen management and anaphylaxis response.
- 5.57. Oversee vendor and service provider management, ensuring that all suppliers, catering providers, activity providers, and external vendors comply with the school's food safety and allergen management standards, including the control of non-food allergens where applicable (e.g., use of henna, animals, or scented products during activities or events).
- 5.58. Monitor deliveries, materials, and services entering the school to ensure adherence to approved safety, hygiene, and allergen control protocols.
- 5.59. Evaluate vendor and service provider performance regularly and take appropriate action to address any non-compliance or safety concerns related to both food and non-food allergens.

- 5.60. Ensure timely procurement of EpiPen boxes and EpiPens when required by the school medical team. All such orders should be marked as priority orders and the same should be communicated to the Procurement Team.
- 5.61. Ensure that bus staff responsible for transporting students with allergies are trained in recognizing the signs and symptoms of allergic reactions and in understanding emergency response protocols, including anaphylaxis management.
- 5.62. Ensure clear communication to all bus staff that the consumption and sharing of food on school buses is strictly prohibited, and that students with allergies must be seated within clear line of sight at all times during transport.

School Food Safety Person in Charge (PIC)

- 5.63. Conduct and document regular inspections of the school canteen and any live food preparation areas in accordance with Local Municipality Food Code requirements and inspection findings must be recorded as per HSE requirements.
- 5.64. Identify, report, and document any non-compliance to the catering company (e.g., Slices) and ensure timely implementation and closure of corrective actions in line with regulatory requirements.
- 5.65. Verify that effective allergen management controls are implemented, including clear identification and labelling of food allergens, prevention of cross-contact during food preparation and service, and staff awareness of allergen risks.
- 5.66. Ensure that any non-food allergen risks within food service areas (e.g., latex gloves, cleaning chemicals, fragrances, or environmental contaminants) are assessed and controlled to minimize potential exposure.
- 5.67. Maintain valid PIC certification and ensure continuous compliance with all local Municipality and GEMS HSE trainings and inspection requirements.

Trip Coordinators/Organizers

- 5.68. Inform the School Clinic / Medical Team of any upcoming trips/events and request updated medical information for students with allergies.
- 5.69. Complete a Risk Assessment Form identifying food and non-food allergen risks and emergency measures before all off-site activities/events.
- 5.70. Communicate known allergens and precautions to activity and off-site trip providers to maintain a safe, allergen-controlled environment.
- 5.71. Verify that vendors and providers follow allergen-free requirements and proper handling procedures.
- 5.72. Maintain records of risk assessments, student medical information, and provider communications.

Catering Vendors, Activity & Off-Site Trip Providers

- 5.73. Ensure full compliance with this policy, including adherence to food safety regulations and allergen management procedures for both food and non-food allergens (e.g., pets, henna, pollen, dust, latex, fragrances).
- 5.74. Provide evidence of proper food handling, hygiene practices, and staff training, including certification where required (e.g., Dubai Municipality PIC certification for catering vendors).
- 5.75. Clearly label all food products, including potential hidden allergens, and provide ingredient lists or allergen information upon request.
- 5.76. Ensure that no allergens are present in foods or materials used during school activities or off-site trips when the school has identified specific allergen-free requirements.
- 5.77. Avoid introducing non-food allergen risks into school environments or during off-site activities, including the use of henna, face paints, scented products, or animals, unless approved in advance by the school.
- 5.78. Cooperate with the school's HSE Team, MSO, and PIC staff by providing all necessary documentation, permits, and training certificates related to food safety, allergen management, and emergency response.
- 5.79. Report any incidents, near-misses, or concerns related to allergens immediately to the school's designated contact and participate in follow-up investigations or corrective actions.
- 5.80. Participate in school-led inductions or training sessions on allergen awareness, safe handling practices, and emergency response procedures, ensuring their staff are aware of school-specific protocols, including off-site trip procedures.
- 5.81. Ensure that all deliveries, on-site activities, or off-site trips do not compromise the allergen-safe environment, including maintaining segregation of allergenic foods and preventing cross-contamination.
- 5.82. Implement risk assessments for off-site trips, ensuring access to emergency medication, trained personnel, and communication protocols to manage allergic reactions effectively.
- 5.83. Accept that non-compliance may result in corrective actions, suspension of services, or termination of contracts, in accordance with GEMS contractual agreements and HSE policies.

GEMS HSE Team

- 5.84. Monitor and evaluate compliance with this policy across schools, including adherence to both food and non-food allergen management requirements, and report any non-conformances or opportunities for improvement.

- 5.85. Review and analyze lessons learned from allergy-related incidents (including those involving food and non-food allergens) to reduce future risk and strengthen prevention and response measures, in collaboration with the school and Medical Directorate.
- 5.86. Conduct periodic audits of school operations, including canteens, food preparation areas, laboratories, and other relevant environments, to verify implementation of allergen control measures and overall HSE compliance.
- 5.87. Collect and maintain records of inspections, incidents, training, and corrective actions for reporting, trend analysis, and regulatory compliance purposes.
- 5.88. Escalate any allergy related incidents to Group Medical Director/Group Head Nurse for quality assurance and compliance with emergency medical protocols.

GEMS Medical Directorate

- 5.89. Ensure that this policy is readily accessible via GEMSnet and effectively communicated to all relevant internal stakeholders.
- 5.90. Review and update this policy periodically, and following any serious incidents, emerging risks, or changes in local regulations or best practice guidance.
- 5.91. Coordinate and support schools and the HSE department in the development, implementation, and continuous improvement of emergency response plans, including anaphylaxis management and other allergen-related protocols.
- 5.92. Promote awareness and best practices across schools regarding allergen risk mitigation, to foster a consistent culture of safety and prevention.

Principal/CEO

- 5.93. Ensure this policy is implemented and communicated to all school staff.
- 5.94. Ensure that the policy is communicated and made available to all parents.
- 5.95. Ensure full adherence to the GEMS Allergy Management Policy in the planning and execution of all staff events.
- 5.96. Support training and resource allocation to maintain a safe environment for students with allergies.

6. Procedure

School Enrolment and Medical Disclosure

- 6.1. The management and well-being of a student with allergies is primarily the responsibility of the parent/guardian. Parents/guardians must therefore provide accurate, complete, and up-to-date medical information regarding

allergies or intolerances to the School Medical Team, supported by a written diagnosis from a qualified medical practitioner prior to starting school.

- 6.2. A valid Medical/Allergy Action Plan issued by the treating physician must be submitted, along with the health forms.
- 6.3. The student's Allergy Action Plan must be readily accessible and provide clear, step-by-step emergency procedures, including student identification details, specific allergens and triggers, type and severity of the allergy, signs and symptoms, prescribed medications with dosage and administration instructions, guidance on when to treat or monitor, emergency contact procedures, parent/guardian and physician details.
- 6.4. Upon disclosure, the School Medical Team will develop an Individual Health Plan (IHP) in collaboration with parents/guardians, incorporating the physician's Allergy Action Plan. The IHP must be reviewed annually or upon any medical updates.
- 6.5. The School Medical Team will communicate essential allergy information, precautions, and emergency response procedures to relevant staff while maintaining confidentiality.
- 6.6. All staff interacting with the student must be aware of the allergy, associated risks, signs and symptoms, and required response actions, including the use of prescribed emergency medication.
- 6.7. The School Leadership Team (SLT) must inform the School Medical Team when substitute teachers are assigned to ensure timely communication.
- 6.8. A clear communication protocol must be maintained to ensure updates on any changes to the student's condition, treatment, or emergency procedures are shared promptly with all relevant stakeholders.

Medication and Consent

- 6.9. Parents/guardians must provide prescribed emergency medication (e.g., epinephrine auto-injectors such as EpiPens) in original, clearly labeled packaging, supported by a valid medical prescription in English.
- 6.10. Written parental/guardian consent must be submitted authorizing trained school personnel to administer emergency medication in accordance with medical instructions and school protocols.
- 6.11. Parents/guardians are responsible for ensuring medications are within 'Best by use' date and replaced as required, and supported by updated medical and consent documentation.
- 6.12. The School Medical Team will notify parents/guardians at least two months prior to medication expiry to ensure timely replacement.

Bus Transportation

- 6.13. For students using school transport, the School Medical Team will provide Bus Guardians with relevant allergy information and training. Bus guardians to enforce a strict no food consumption policy on buses.
- 6.14. Bus staff responsible for transporting students with allergies must be trained to recognize the signs and symptoms of allergic reactions, understand emergency response protocols, and ensure that students with allergies are seated within clear line of sight at all times during transport.
- 6.15. Bus staff must sign an undertaking confirming their awareness of procedures and responsibilities.
- 6.16. The MSO must notify the School Medical Team of any substitute Bus Guardian to ensure appropriate communication.
- 6.17. In the event of an allergic reaction, the Bus Guardian must immediately contact emergency services and parents/guardians to inform them of the student's condition.
- 6.18. Food sharing is strictly prohibited under any circumstances on school buses and is otherwise only permitted for pre-packaged, clearly labelled items from reputable vendors approved by staff during school activities.

Planning of Activities Involving Food

All school activities involving food or allergens, including offsite trips, school celebrations, class parties, parent-led events, bake sales, unplanned food sharing, and Food Technology classes must follow strict planning and risk assessment procedures to ensure student safety.

Risk Assessment

- 6.19. All relevant activities must undergo a formal risk assessment prior to commencement.
- 6.20. Assessments must identify allergen risks (including non-food allergens), define control measures, and ensure emergency response arrangements are in place.
- 6.21. Risk assessments must be completed by the Activity/Event Coordinator with the support of the MSO, if required using the GEMS HS Form 5 template, and approved by the Principal/MSO/School Clinic.
- 6.22. The assessment must identify students with medical conditions, align with IHPs, confirm availability of medication and trained staff, and document emergency procedures.

Offsite Trips, School Activities, School Events and Food Technology Classes

- 6.23. All trips, activities, events, and Food Technology lessons must include allergy risk assessments and identification of all food-related components.
- 6.24. Parental consent is mandatory for participation, including disclosure of known or newly identified allergies and approval for practical cooking activities where applicable.
- 6.25. The Activity Coordinator must share relevant allergy information with supervising staff, external providers, and the School Medical Team.
- 6.26. The School Medical Team must be informed at least two weeks in advance to review records, update allergy trackers, and communicate risk information, and will provide updated allergy information to teachers at the start of each academic period.
- 6.27. Full ingredient and allergen disclosure is required for all food provided, and only food with complete ingredient information may be used.
- 6.28. Only approved caterers should be used where possible; external vendors must comply with regulatory and GEMS requirements.
- 6.29. Suitable alternatives or activity modifications must be arranged for students with allergies, and teachers must ensure prevention of cross-contamination in Food Technology lessons.
- 6.30. Non-compliant items must be removed and returned to parents.
- 6.31. Supervising staff must be trained to recognize allergic reactions and administer emergency medication.
- 6.32. Emergency medication must be included in first aid provisions and remain accessible at all times, in line with the GEMS First Aid Policy.
- 6.33. Written emergency procedures must be provided for students who require an EpiPen.

Food Sourcing and Vendor Controls

Approved Caterers

- 6.34. Schools must use designated approved caterers who are responsible for regulatory compliance.
- 6.35. These providers should be prioritized for all school events and activities.

Other Vendors

- 6.36. Any alternative vendor must be approved through the GEMS Procurement Team.
- 6.37. Depending on the purchase value, exceptional approval from the Chief Financial Officer or Chief Procurement Officer is required for non-approved vendors, supported by completion of the relevant vendor checklist and risk assessment in coordination with Risk and Assurance Teams.

- 6.38. Vendors must be licensed, approved, authorized, and must not be home-based.

7. Emergency Management

Recognition of Symptoms

- 7.1. All staff must be aware that allergic reactions may present with mucosal, skin, gastrointestinal, respiratory, cardiovascular, or neurological symptoms. These may occur within minutes to up to 1–2 hours after exposure. Rapid progression or involvement of multiple systems may indicate anaphylaxis, requiring immediate intervention.
- 7.2. Common Signs and Symptoms of Allergic Reactions:
- Mucosal: red/watery eyes, swelling of lips, tongue, or face
 - Skin: itching, flushing, rash, hives
 - Gastrointestinal: nausea, abdominal pain, vomiting, diarrhea
 - Respiratory: nasal congestion, coughing, wheezing, shortness of breath, difficulty swallowing, chest tightness
 - Cardiovascular: dizziness, fainting, weak pulse, low blood pressure, loss of consciousness
 - Neurological/Behavioral: confusion, irritability, change in alertness, sense of impending doom

Emergency Response Protocol

- 7.3. Immediately refer student to the school medical team.
- 7.4. The school medical team should assess the student for early recognition of the signs and symptoms of anaphylaxis.
- 7.5. The school medical team should administer treatment according to the child's Individualized Healthcare Plan/Allergy Action Plan. If there is an allergic case with no known history of allergies, treatment should be provided as per the assessment of the medical team.
- 7.6. The school medical team should call the child's parents immediately in the case of any allergic reactions. All severe reactions, or reactions among those with a known medical history of food allergies and who are displaying signs and symptoms of an allergic reaction, should be taken to the hospital by ambulance after appropriate initial management that may include the use of an EpiPen where applicable.
- 7.7. Should activities happen outside regular school hours, therefore no medical team onsite, the activity provider (school or third party), must have a risk assessment in place for individuals with food allergies, including actions to take

for emergency response. School activities, such as squads, should have at least one trained first aider present.

- 7.8. All incidents must be escalated to the Group Medical Director on the same day, followed by documentation in the HSE Guard system.

8. Training and Documentation

- 8.1. The School Medical Team is responsible for training staff (Teachers, Educational Assistants (EA), Trip Coordinators, Bus Guardians, etc.) on allergy management, recognition of anaphylaxis, and administration of emergency medication (e.g., EpiPen).
- 8.2. Training must be conducted annually during the orientation week or whenever a student with a new allergy joins the school.
- 8.3. For off-site trips, the School Medical Team will ensure that the designated First Aider accompanying the trip is trained in the use of emergency medication and appropriate response procedures.
- 8.4. All training sessions must be documented, with staff signatures confirming their understanding and retained for internal review and audits.

9. Recordkeeping and Confidentiality

- 9.1. All allergy-related information, including Individualized Healthcare Plans (IHPs), Allergy Action Plans, parental consent forms, and emergency medication records, must be maintained securely by the School Medical Team and shared on a need-to-know basis only with all relevant personnel.
- 9.2. Records must comply with the data protection regulations and GEMS policies, ensuring confidentiality, accuracy, and secure storage.

10. Community Awareness

- 10.1. Schools should promote awareness among students, parents, and staff regarding the importance of nut-free or allergen-safe lunchboxes and the seriousness of allergic reactions.
- 10.2. Awareness may be raised through visual materials, educational infographics, parent newsletters, and reminders via parent apps. Schools may also liaise with the School Medical Team for support and resources.

11. Monitoring and Compliance

- 11.1. This policy shall be reviewed periodically in accordance with GEMS Education governance procedures and local regulatory authority requirements.

Obligation to report non-compliance with this policy

11.2. All Personnel who suspect or become aware of any non-compliance with this policy have an obligation to report this promptly. Reporting can be made via the following routes:

- a. for GEMS Personnel, to the respective line manager;
- b. to the Compliance Department (compliance@gemseducation.com); or
- c. through the Group's anonymous whistle-blower hotline (contact details provided below), in accordance with the Group's **Whistle-blowing Policy POL/HR0014**.

Channel	Details
Toll free number	80004440408 (UAE) / 00800101094 (Qatar)
Email address	speakup@gemseducation.com
Website	https://gems.speakup.report/speakup
Website QR Code	
GEMS Group Organization Code	128626 (Remember: Using the correct organization code helps us receive and address your concern promptly and confidentially)
QR Code for the Speak Up Application Available on iOS and Android.	

Investigation of reports of non-compliance

- 11.3. Reported allegations of non-compliance with this policy will be considered and, if appropriate, investigated by the Company.
- 11.4. Unless otherwise directed by the GEMS Board or Board Risk & Audit Committee, the Chief Risk and Assurance Officer (in conjunction with the Medical Directorate) is responsible for initiating and overseeing any investigation into reports of non-compliance with this policy.
- 11.5. GEMS Internal Audit Department shall, at periodic intervals, make arrangements for an audit of compliance with the internal control systems and procedures governed by this policy. The results of such audits shall be reported to the Risk & Audit Committee of the GEMS Board.

12. References

- Dubai Municipality - Guidelines and Requirements for Food and Nutrition in Schools in Dubai
- Dubai Municipality Food Code 2.0 (2023)
- Dubai Health Authority - School Health Policies
- Abu Dhabi Quality and Conformity Council - AD Guideline for Unified School Nutrition and Food Safety (2025)
- CDC - Food Allergies in Schools, <https://www.cdc.gov/healthyschools/foodallergies/>(2024)
- HSE-FORM-05 HSE Risk Assessment Form

13. Annexes

- Appendix A: [ALLERGY ACTION PLAN](#)
Appendix B: [INDIVIDUALIZED HEALTH CARE PLAN \(IHP\) - DUBAI ONLY](#)
Appendix C: [PARENT/GUARDIAN MEDICATION CONSENT FORM - DUBAI ONLY](#)