

# Risk Management Policy

## Trust Policy

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<i>Trust/school-mandatory policies</i>	Health and Safety Policy – Trust and Schools
<i>Optional school policies</i>	
<i>External</i>	
<i>Other</i>	School & BU CRR Template (EXCEL)

### Document Control

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08/11/21	1.1	Trustee approved Audit & Risk Committee, 02/11/21. Changes agreed as follows
		<b>Section</b>   <b>Change</b>   <b>Comments</b>
		Title Page   Update   Referenced School & Business Unit CRR Template
		4   Addition   Added compliance section
		4   Update   Specified schools/business units to publish top 10 risks Revised shared document references
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		5.2   Addition   Added Strategic Goal Impacted
		5.5   Update   Revised first sentence
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27/11/23	1.3	Revised job titles in line with current organisational structure Review cycle changed from annual to every 2 years New schools added (those that have joined the trust since policy was last reviewed)

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## Key Contacts

**Trust**  
COO [poverly@learningpartners.org](mailto:poverly@learningpartners.org)

Please note that this list may be updated by the responsible officer when change arises in the organisation, without the need for committee meeting review/approval.

## 1 Introduction

This Risk Management Policy is designed to ensure that all schools within the Learning Partners Academy Trust (the “trust”) develop and maintain systems of internal control and risk management, to minimise risks.

It is aimed at school staff, central head office staff, governors, and trustees. The purpose of the policy is to:

- Define responsibilities;
- Ensure a consistent approach across all schools within the trust;
- Identify procedures to ensure integrity of internal controls; and
- Set out guidelines to ensure effectiveness.

The policy has been prepared in accordance with the

- Requirements of the Department for Education (DfE);
- Directives from the Education and Skills Funding Agency (ESFA)

Risk management involves the identification, measurement, management, monitoring and reporting of threats to an organisation’s business objectives. Risk management covers the whole spectrum of risks and not just those associated with finance, health and safety, and insurance. It also includes risks associated with public image (reputation), projects, partnership working, the environment, technology, breach of confidentiality etc.

The purpose of the policy is to:

- Outline the trust’s risk and control framework
- Define responsibilities;
- Ensure a consistent approach across all schools within the trust;
- Identify procedures to ensure integrity of internal controls; and
- Set out guidelines to ensure the effectiveness and minimise risk.

The process of identifying risks and the introduction of internal controls to help mitigate such risks helps to improve the trust’s ability to respond quickly and effectively to opportunities and threats. It is an effective tool for strategic and business planning; is a key element of the trust’s governance framework; and is central to the achievement of the trust’s objectives.

Risk management is not about being “risk averse” - it is about being “risk aware” to achieve the trust’s objectives and is an essential component of the trust’s operation.

## 2 Definitions

The following phrases are used throughout this policy

- **Risk:** The chance (high or low) that the trust/school/business unit could be adversely affected by a given event or that people could be harmed by hazards, together with an indication of how serious the harm/impact could be.
- **Control measure:** Action taken to prevent the trust/school/business unit being adversely affected or people being harmed.

Where we refer to school, this should also apply to any separate business unit, including any subsidiary of the trust.

## **3 Roles and Responsibilities**

### **3.1 The Board of Trustees**

The Board of Trustees have overall responsibility for ensuring that the trust has an appropriate and effective system of control, both financial and operational.

The Audit & Risk Committee reviews the framework for internal risk management and control, monitoring the process of risk, approving a supplementary programme of internal audit to provide assurance in areas of high risk. Each committee of the board (including Audit & Risk), is responsible for the oversight of risks in their respective areas, as brought to their attention by the executive team.

The board have the responsibility of reviewing risks on an annual basis and determining the trusts key risks, which must be disclosed within the annual accounts, along with mitigating strategies.

### **3.2 The Executive Team**

The executive team are responsible for managing and monitoring risks identified and regularly keeping the Central Risk Register up-to-date and reflecting trust-wide risks, in consultation with schools. The Head of Operations will provide assurance to the Audit & Risk Committee regarding key risk processes being in place. (See section 4.)

### **3.3 Local Governing Bodies**

Local Governing Bodies (LGBs) should review key processes in risk management and determine the appropriateness of local risk management strategies. The LGB must review the full school-based risk register at least annually and should have regular oversight of progress regarding risk management – for example as a standing agenda item at each meeting of risks, which might be limited to risks allocated to a given committee.

### **3.4 Headteachers**

Headteachers are responsible for ensuring that local risk processes are operational at their school, to minimise risk and relevant documentation is kept up-to-date, which identifies, manages and monitors risk.

### **3.5 Senior Leadership Teams**

Should undertake all key processes in risk management and review the school-based risk register at least termly, monitoring progress regarding risk management on a regular basis – for example as a standing agenda item at each Senior Leadership Team (SLT) meeting.

Trust-wide risks should be alerted to the executive team, with the latest updated risk document shared (using the trust-wide document sharing system – see Contacts list).

### **3.6 Staff**

Should undertake risk assessments in accordance with guidelines set out within the Health & Safety Policy, follow risk assessment guidelines, and raise any concerns to management.

### **3.7 Pupils, Visitors and Contractors**

Pupils and visitors must comply with risk assessment guidance. Contractors are expected to provide evidence that they have adequately risk assessed all their planned work.

## 4 Key Risk Processes

**Central Risk Register** – the 'CRR' identifies principal risks that could affect the operations of the school, business unit and/or the academy trust, documents the actions adopted to manage and monitor risks in order to minimise the likelihood or reduce their impact. Each entity should review their CRR on an annual basis, at the beginning of each academic year, reporting their top ten risks, so that this can be fed into the trust-wide review in the autumn term.

Store on Trust Document Sharing System: Documents > Risk Management > Central Risk Register > School or BU Risk Registers

**Emergency Planning** – the emergency plans sets out key actions to take in the event of an immediate onsite or an offsite emergency. It should be reviewed on an annual basis at the beginning of each academic year, in accordance with the Health & Safety Policy. Schools should use the Surrey Country Council emergency plan template unless directed otherwise. Sites should conduct testing as per the plan, recording this in the Risk Management Test Log.

Store on Trust Document Sharing System: Documents > Emergency Planning > School or BU

**Business Continuity Planning** - the business continuity plan should outline what alternate strategies can be used to keep the business operating, in the event of a major disaster, requiring partial or offsite operations. It should be reviewed on an annual basis at the beginning of each academic year. Schools should use the trust's business continuity template, unless directed otherwise. Sites should conduct any testing regarding this plan in the Risk Management Test Log.

Store on Trust Document Sharing System: Documents > Operations > Emergency Planning > School or BU

**Disaster Recovery Planning** - the disaster recovery plan should outline what equipment is required to operate at each location and how this should be installed in the event of a disaster. It should be reviewed on an annual basis at the beginning of each academic year. Schools IT Teams should use the trust's Disaster Recovery template, unless directed otherwise. Sites should conduct testing as per the plan, recording outcomes and follow-up actions in a Risk Management Test Log.

Store on Trust Document Sharing System: Documents > Operations > Emergency Planning > School or BU

**Risk Assessments** – A risk assessment is a tool for examining the hazards linked to a particular activity or situation, and establishing whether enough precautions have been taken in order to prevent harm from them based on their likelihood and their potential to cause harm. Schools risk assessments must be defined for onsite and offsite activities, in accordance with the trust Health & Safety Policy. These should be reviewed and shared on a regular basis.

Store on Trust Document Sharing System: Documents > Risk Management > Local Risk Assessments > School or BU

**Risk Management Test Logs** – identifies the testing that was completed against a plan (emergency, business continuity, disaster recovery) and the progress against any process improvement actions that were identified through the testing process.

Store on Trust Document Sharing System: Documents > Operations > Risk > Local Risk Assessments > School or BU > Testing

**Internal Audit Assurance** – internal audit provides independent assurance to the board that the trust's financial and non-financial controls and risk management procedures are operating effectively and in compliance with regulatory provisions and internal policies, through a programme of internal scrutiny. The Audit & Risk Committee appoints the internal auditor and sets an annual programme of assurance. Recommendations are implemented within a short timeframe to minimise risk. Local reporting of progress is coordinated by SBMs to Heads and LGBs, and trust-wide reporting and monitoring is conducted by the Head of Operations to the CEO and Audit & Risk Committee.

Store on Trust Document Sharing System: Documents > Operations > Risk > Internal Audit

**Compliance** – internal compliance work helps identify legal and regulatory matters that the trust should comply with and embeds these within trust policies, and processes. Compliance work is then undertaken to identify for higher risk matters, the extent to which the central team

and schools are compliant and support actions to become compliance. Finally, compliance reporting is provided on a termly basis to the Audit & Risk Committee, to keep abreast of compliance matters.

Store on Trust Document Sharing System: Documents > Operations > Compliance

## **5 Central Risk Register Processes**

This section provides guidance regarding the Central Risk Register (“CRR”).

### **5.1 Approach**

The trust has a rolling programme of risk assessment and management through which risks across all areas of the trust’s operations are identified and managed. This is documented in the trust-wide Central Risk Register, which is devised from a combination of

- Individual school risk registers (each school; each business unit)
- Trust (central/trust) risk register (one)

The system is designed to manage risk so to provide as high a level of assurance as is reasonably practical without unduly constraining the Trustees’ wish to be an innovative organisation that leads by example. An element of risk is always present when treading new ground. The Trustees recognise that risk cannot be completely eliminated, but it can be understood, managed and controlled.

The trustees’ attitude to risk is conservative. Activities are undertaken with a clear understanding of the risk involved and no activity would be undertaken that risked the viability of the business. All major decisions should be taken with extensive discussion between Trustees, officers and staff and where appropriate other stakeholders are to be involved.

The process of managing risk across the trust is reviewed annually by the Audit & Risk Committee. This will determine and review the approach, guidance, tools and effectiveness of risk management.

## 5.2 Overview of CRR

Each school (or business unit), will have their own risk register, following the trust's CRR template, (See example in Appendix 1), with the following elements:

- **Current Rank:** rank of all risks on register taking highest current risk first, target risk second and pre-control risk rating third.
- **Owning Committee:** Risks should be reviewed regularly, through multiple levels in the organisation. Each risk should be assigned to a relevant committee, such that there is effective monitoring of risk minimisation by governors/trustees. This field identifies which committee has oversight of this risk for termly review.
- **Leadership Team Owner:** An owner should be assigned who will oversee actions to help minimise the risk, giving a new score, should the risk be carefully managed. One member of the senior leadership team must be assigned to have oversight that all control measures are in place and action plans are developed and tasks assigned to appropriate individuals across the organisation and completed in a timely manner.
- **Unique Risk Number:** Risks should be uniquely numbered, to allow identification over time. To allow clear identification of the risk across the trust, the risk should be preceded with the code below for the school or business unit, for example:

School / Business Unit			
SECONDARY		PRIMARY	
GAB	George Abbot	BGR	Boxgrove Primary School
SCITT	George Abbot SCITT	GGR	Guildford Grove Primary School
1119	11-19 Well Project	BUR	Burpham Primary School
FBR	Fullbrook School	LFI	Loseley Fields Primary School
FSC	Fullbrook Sports Centre	NME	Northmead School
GCS	Guildford County School	TBN	Tillingbourne Junior School
GLB	Glebelands School	PBR	Pirbright Village School
KCG	Kings College Guildford	STO	Stoughton Infant School
		SFI	Sandfield Primary School
		SHF	Shalford Infant & Nursery School

- **Risk Title:** succinct description of risk
- **Risk Description:** Risks should be described, so that is clear what the specific risk is to the school or trust. The description should include
  - **Risk** - that could occur
  - **Event** - that would trigger the risk
  - **Cause** – underlying root cause that means the event causes a risk
- **Strategic Goal Impacted:** identifies trust strategic plan or school development plan areas impacted
- **Pre-Control Score<sup>1</sup>:** Risks are scored on the basis of the proposed risk control measures, relating to: likelihood (1-5); potential impact (1-5); and then multiplied, with the resultant highest risk score being 25.
- **Control Measures:** A summary of key controls that will be put in place to minimise the risk. These will need to be detailed and monitored – possibly in separate action plans.
- **Desired Post-Control Score:** The target risk level that the trust (school or business unit), would like to achieve is identified, considering control measures and defined action plans that will be put in place.
- **Current Post-Control Score:** Risks are scored again considering the latest status of the new control measures and defined action plans.
- **Previous Review:** The date of the previous formal review by a committee.
- **Latest Change:** Direction of travel of pre- or post-measure risk since the previous formal review.
- **Recent Review:** Date when this particular risk was most recently reviewed.
- **Comments:** optional.
- **Next Review:** Proposed date of next formal review.

<sup>1</sup> Colour coding allows the reader to see their most significant risks in red, then amber, and green.



- **Risk retired date<sup>2</sup>:** Date when risk was no longer considered significant enough to retain on register.
- **Retirement Rationale:** rationale for retiring risk.

### 5.3 Identifying Risk

The risk register should consider all potential risks to the operations of the school (e.g. financial, political, reputational, environmental, etc.) and document the most significant risks. These risks can then be devised bottom-up from a combination of:

- Departments
- SLT; and/or
- LGB.

In addition to verifying legal/regulatory obligations, a cross-check could also be made with other academy risk registers.

### 5.4 Assessing the Risk

Risk is measured pre-controls and post additional controls being put in place.

#### a) Likelihood

The likelihood of an event occurring should be expressed as a frequency for risks that could recur over time (e.g. accidents), and as a probability for one-off risks (e.g. compliance of accounting standards).

Score	Likelihood Criteria
5	Frequent (one or more occurrences per year) Very likely >80%
4	Occasional (between 1 to 5 years between occurrences) Quite likely (20% - 80%)
3	Unusual (between 5 and 10 years between occurrences) More unlikely than likely (10% - 20%)
2	Rare (between 10 and 50 years between occurrences) Fairly unlikely (5% - 10%)
1	Very rare (less than once per 50 years) Very unlikely (<5%)

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<sup>2</sup> In the case of retired risks, these should be moved to archived risk log, rather than kept in the live document.

## b) Impact

The impact of an event occurring can be assessed relating to reputation, operations, finance, teaching and learning or human impact, as outlined below:

Score	Impact Criteria
5	<p><b>Catastrophic impact</b> Threatens the existence of the organisation <u>Reputation:</u> Event (safeguarding, multiple adverse Ofsted outcomes, , other), has major and long-term reputational damage, leading to regulatory action and/or organisational unviability <u>Operational:</u> Long term or permanent closure of schools, total loss of data <u>Financial:</u> Catastrophic– impact &gt; £10million <u>Teaching and Learning:</u> Loss of more than 1 month’s teaching. Very likely impact on exam results <u>Human/H&amp;S:</u> Multiple deaths or life changing injuries</p>
4	<p><b>Critical impact</b> Major impact on organisational objectives <u>Reputation:</u> Event (safeguarding, Ofsted, parent engagement, other), has medium-term reputational damage, which will seriously impact pupil numbers, requiring recovery/marketing programme. <u>Operational:</u> Closure of school for &gt;2 weeks, but not permanent <u>Financial:</u> Requires major refinancing (e.g. up to 5-20% SBS) – impact &gt; £1million <u>Teaching and Learning:</u> Loss of 2 to 4 weeks teaching. Likely impact on exam results <u>Human/H&amp;S:</u> Illness of epidemic proportions, pupil/staff death or injury with lifechanging impact</p>
3	<p><b>Significant impact</b> Causes failure to achieve 1 or more objectives <u>Reputation:</u> Event (safeguarding, Ofsted, parent engagement, other), has short-term reputational damage, which could impact pupil numbers, requiring recovery/marketing programme. <u>Operational:</u> Significant proportion of school or major operating facility out of use for more than a week <u>Financial:</u> Requires significant review of budget (e.g. up to 5% SBS) – impact &gt;£100,000 <u>Teaching and Learning:</u> Loss of 1 days to 2 weeks of teaching <u>Human/H&amp;S:</u> Injury or illness requiring emergency medical attention and/or medium-term absence</p>
2	<p><b>Moderate impact</b> <u>Reputation:</u> Event (safeguarding, Ofsted, parent engagement, other), has reputational damage, requiring remedial action. <u>Operational:</u> Disruption to some activities, school or operating facility out of use for less than a week. <u>Financial:</u> Requires minor review of budget – impact &gt; £10,000 <u>Teaching and Learning:</u> Loss of 1 to 5 days teaching <u>Human/H&amp;S:</u> injury or illness requiring medical attention</p>
1	<p><b>Minor impact</b> Localised issue and impact <u>Reputation:</u> Event (safeguarding, Ofsted, parent engagement, other), has minor, short-term reputational damage. <u>Operational:</u> Disruption to activity, but no operations have to stop <u>Financial:</u> Containable within existing budget – impact &lt;£5,000 <u>Teaching and Learning:</u> Loss of half day's teaching <u>Human/H&amp;S:</u> Minor injury or illness requiring first aid attention</p>

### c) Risk Scoring

Risk is finally scored as follows: Level of Risk = Likelihood x Impact

Preferably we would drive all our level of risk scores to below 6, as outlined in green below.

Likelihood	5	5	10	15	20	25	significant risk zone
	4	4	8	12	16	20	
	3	3	6	9	12	15	
	2	2	4	6	8	10	
	1	1	2	3	4	5	
		1	2	3	4	5	
		Impact					

### 5.5 Minimising Risk through Additional Control Measures

A summary of actions will be included within the CRR. There may be a need for additional supporting plans.

#### a) Approach

Any or a combination of the following approaches may be appropriate to managing a risk:

- **Transfer.** For some risks the best response may be to transfer them. This might be done by conventional insurance, or it might be done by paying a third party to take the risk in another way. This option is particularly good for mitigating the financial impact of risks to assets.
- **Tolerate.** The exposure may be tolerable without any further action being taken. Even if it is not tolerable, the ability to do anything about some risks may be limited, or the cost of taking action may be disproportionate to the potential benefit gained. In these cases, the response may be toleration. This option may be supplemented by contingency planning for handling the impacts that will arise if the risk is realised.
- **Treat.** By far the greater number of risks belongs to this category. The purpose of treatment is not necessarily to eliminate the risk, but more likely to take control action to contain the risk to an acceptable level.
- **Terminate.** Some risks will only be treatable, or containable to acceptable levels, by terminating the activity. It should be noted that the option of termination of activities may be severely limited in the public sector when compared to the private sector; a number of activities are conducted in the public sector because the associated risks are so great that there is no other way in which the output or outcome, which is required for the public benefit, can be achieved.

- **Take advantage.** In recognition that the uncertainty attached to risk sometimes offers opportunities as well as threats. For example, an academy trust may take advantage of working with a local university’s media faculty on a campaign to publicise the academy trust; this may run the risk of taking up staff time, but could lead to the opportunity to increase pupil numbers and funding.

The risk is reassessed, on the basis of the above actions, giving a desired post-control risk score (assuming all measures are enacted), and a current post-control risk score (based on the current status).

## b) Action Plans

Action plans are to be developed for risks, showing actions that need to be undertaken, by whom and by when. Some risks will have lengthy action plans; others may only have a small number of items which can be dealt with on the CRR. See a suggested example below:

**Risk Short Description [CRR-GEP1.1, Pre-Control 25/Post-Control 16]**

Action	Start Date	End Date	Responsible	Status	Comments
Main Action 1				Complete	
Main Action 2	Oct-17	Dec-17			
Sub Action		Oct-17		Complete	
Sub Action		Oct-17		Complete	
Sub Action		Nov-17		Overdue	
Sub Action		Dec-17		On Track	
Main Action 3	Mar-18	Aug-18			

## 5.6 Monitoring Risk

The risk register content and status are closely reviewed regularly by trustees, governors and the schools’ Senior Leadership Teams - to understand current status and score, but also to review if a risk should be removed or added to the overall register.

- Annual Agenda Item for overhaul/approval of the risk register by full committees (ideally September), as risks could be reputational, not just financial
  - LGB, for school risk register
  - Directors/AGM or Management Team, for business unit risk register
  - Board of Trustees for trust-wide CRR
- Termly Standing Agenda Item for oversight of risks delegated to committees
  - LGB (committees), for school risk register(s) and associated action plan progress
  - Trustee committees for trust risk register and associated action plan progress
- Termly Senior Leader review
  - School SLTs
  - Trust Executive Team

Schools are required to review their risk register at least annually.

High risk items should form agenda items for governors and SLT and equally appear on the risk register.

High risk items to the trust must be escalated to the trust executive team.

## 6 Appendix 1: Example Risk Register

Schools should use the School & Business Unit CRR template, as shown below.

Risks are ordered by highest risk, identified by the current post-control score. Risks can be sorted by committee with oversight or by employee with responsibility.

In this view, only the trust-wide risks with oversight by the Audit & Risk Committee are displayed:

Current Rank	Owning committee	Leadership Team Owner	Unique Risk Number	Risk Title	Risk Description	Strategic Goal Impacted	Pre-Control Score			Control Measures (All assumed to be 'treated' unless otherwise stated)	Desired Post-Control Score	Current Post-Control Score			Previous Review	Latest Change	Recent Review
							Likelihood (1-5)	Impact (1-5)	Total Risk Score			Likelihood (1-5)	Impact (1-5)	Total Risk Score			
1	Audit and Risk	ALF	CRR-12	Compliance	<p><b>Risk:</b> Liability, notice/fees from regulatory bodies, reputational damage</p> <p><b>Event:</b> Non-compliance</p> <p><b>Cause:</b> Legal and regulatory duties (e.g. data protection, employment law, safeguarding) not reviewed and/or not compliant within identified timeframes. Schools failure to comply with Trust policies.</p>	All	5	2	9	<ul style="list-style-type: none"> <li>- Self-evaluation of compliance requested from schools</li> <li>- Recruit Compliance Officer (underway)</li> <li>- Review each compliance area to establish requirements and compliance level (underway)</li> <li>- Use Clerk / Chair meetings to ensure LGBs recognise their role</li> <li>- Use Head/SBM meetings to ensure schools recognise their role</li> </ul>	6	4	2	8	Sep-21	↔	Nov-21
3	Audit and Risk	PAJO	CRR-20	Cyber Crime	<p><b>Risk:</b> Significant financial loss (e.g. from a ransomware attack), significant and prolonged disruption of the ability of the trust and/or its schools to operate effectively, significant time and expense in restoring proper operation or loss personal data with consequent reputational damage and possible financial penalties.</p> <p><b>Event:</b> IT systems may succumb to cyber-attack, either internally or externally</p> <p><b>Cause:</b> Inadequate protection against unauthorised physical or software access, inadequate software security measures or inadequate training of users.</p>	All	4	2	8	<ul style="list-style-type: none"> <li>- Appropriate use of ICT policy</li> <li>- Robust anti-virus, firewall, backup measures in place</li> <li>- Regular staff awareness training</li> </ul>	4	3	2	6	Sep-21	↑	Nov-21
5	Audit and Risk	PAJO	CRR-19	Fraud / financial irregularity	<p><b>Risk:</b> Significant financial loss, regularity issue inappropriate use of funds, notice to improve, reputational damage.</p> <p><b>Event:</b> Fraud</p> <p><b>Cause:</b> Poor policies, procedures, training, internal review/audit processes.</p>	All	4	2	8	<ul style="list-style-type: none"> <li>- Finance Policy, Anti-Fraud and Corruption Policy</li> <li>- Regular training for Heads and SBMs</li> <li>- Internal Audit</li> </ul>	2	2	2	4	Sep-21	↔	Nov-21