



Policy

Policy title:	Risk Management and Controls
Function:	<p>The school faces many different risk issues that, if poorly managed, might have a detrimental impact on its ability to achieve its objectives and jeopardise the realisation of the school's objectives.</p> <p>This document sets out a process to ensure the avoidance of reactive risk management and supports a proactive, thorough and effective approach to ensure the school continues to meet high educational standards, demonstrate value for money and protect its assets.</p>
Status	Approved
Statutory guidance:	Academies Financial Handbook and Academy Funding Agreement (Education Funding Agency)
Audience:	Staff, Leaders, Trustees
Ownership:	Senior Leaders
Last reviewed:	October 2021
Reviewed by:	Finance and Resource Committee and Board of Trustees
Next review:	Annual - October 2022

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Aims and Objectives

- 1 This document sets out a process to ensure the avoidance of reactive risk management and supports a proactive, thorough and effective approach to ensure The Blue Coat School is able to continue to meet high educational standards, demonstrate best value and protect its assets in accordance with the Funding Agreement and Academies Financial Handbook.

The school is committed to establishing a systematic and consistent approach to risk identification, analysis and control with the following objectives:

- embed risk management into the culture of the school through decision making, strategic planning and project management;
- contributes to safeguarding of students and others to whom the school has a duty of care;
- comply with statutory obligations;
- enables the school to deliver its priorities and services effectively, preserving and enhancing the delivery of education within the school;
- contributes towards the achievement of sustainable improvement;
- protect its property including the school estate, equipment, vehicles and other resources;
- reduces the number and cost of insurance and contractual claims arising;
- maintain effective control of public funds;
- support the quality of the environment;
- protect the school's reputation.

Roles and Responsibilities

- 2 The Board of Trustees fulfils its role by agreeing objectives, plans and resources by means of the budget and annual school improvement plans; establishing a system of internal control; approving and reviewing a series of underpinning policies and a means to hold school leaders to account for performance. The Board of Trustees will review the school's risk management arrangements in line with its agreed terms of reference and will receive regular reports from the Resource and Finance Committee (inc Audit and Risk sub-committee) as part of a statement of internal controls.
- 3 The Headteacher will:
 - establish clear roles, responsibilities and reporting lines for managing risks;
 - provide a framework for recording and reviewing potential risks and associated actions;
 - reinforce the importance of effective risk management by offering training, good practice and other support;
 - ensure this policy is communicated to all members of staff and applied consistently.
- 4 Senior Leaders (LM, CTLA, PDBW, UoR) will:
 - consider risks and opportunities as part of their decision making and day to day activities for the school;
 - highlight risks and opportunities and implementing agreed actions;
 - implement policies on risk management and internal control
 - advise on the fundamental risks faced by the school and help to evaluate them;
 - provide timely and sufficient information to Trustees on the status of risks and controls;
 - update the risk register at regular intervals and make available to the Board of Trustees to inform their decision making.

- 5 Employees will:
- ensure they have read and understand all aspects of this policy;
 - comply with measures to manage risk;
 - Co-operate with agreed action plans to manage and control risk;

Procedures and Practices

General principles

- 6 The Blue Coat School views corporate risk management as an integral part of good corporate governance.

For the purpose of this document, corporate risk has been defined as something that might have a detrimental impact on the achievement of the school’s objectives and jeopardise the realisation of the school’s vision. Managing corporate risk is defined as encouraging innovation through a managed process, ensuring tangible and intangible assets are safeguarded.

Risk management is not about eliminating risk but about identifying and understanding it and therefore allowing it to be managed more effectively.

Attitude to risk

- 7 It is recognised that schools now work in an increasingly litigious and risk-averse society however, Trustees and senior leaders at The Blue Coat School intend to manage risk rather than avoid it and they do not intend their consideration of it to stifle innovative decision making.

The approach to assessing risk will be an integral part of school planning and project management and will be developed with the minimum of bureaucracy.

- 8 The types of risks which the school faces have been categorised in the following table and have been identified under these headings in the controls register (Annex A).

Primary:

1	Failure to comply with statutory obligations and regulations such as those covering environment, health and safety, employment practice and human rights.
2	Poses a threat to the achievement of educational objectives, including failure to take opportunities to improve educational standards within the school.
3	Failing to fulfil our duty of care to those that the school comes into contact with.
4	Loss or deterioration of assets above and beyond normal wear and tear;
5	Potential to damage the school’s reputation and undermine public confidence.
6	Failing to protect the environment from the actions of the school itself or from others operating within the boundaries of the school.

Secondary:

L&M	Leadership and management
UOR	Use of resources
CTLA	Curriculum, teaching, learning and assessment
PDBW	Personal development, behaviour and welfare

9 Risks will be treated in accordance with the following:

Transfer	Trans	This may be done by conventional insurance or by paying a third party to take the risk in another way.
Tolerate	Tol	Exposure to risk may be tolerable without any further action. Alternatively, it may not be possible to do anything about the risk without a disproportionate cost.
Treat	Treat	This may not obviate the risk – it is more likely that the aim will be to contain it to an acceptable level.
Terminate	Term	This response is used when the only way to contain a risk to acceptable levels is to discontinue the activity that gives rise to the risk (not possible if there is a legal duty to engage in the activity).

10 The following matrix will be used as a guide when determining how risk will be assessed.

Score 9 High risk Score 3-6 Medium risk Score 1-3 low risk (Risk score = SxL)		Likelihood of impact (L)		
		Low (1)	Medium(2)	High (3)
Severity of impact (S)	Low (1)	1	2	3
	Medium (2)	2	4	6
	High (3)	3	6	9

Monitoring, Review and Evaluation

11 The Board of Trustees will work closely with senior leaders to ensure it regularly considers its approach to risk management and will ensure that the Risk management and controls register is monitored, reviewed and evaluated through the Resource and Finance Committee (including audit and risk sub-committee) to ensure it reflects the current position for the school.

Considerations of risk control will include:

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- whether risk management continues to be linked to the achievement school objectives;
- the appropriate risk appetite or level of exposure for the school as a whole;
- whether risk review procedures cover fundamental strategic and reputational, operational, compliance, financial and other risks to achieving the school’s objectives;
- whether the extent and frequency of reports on internal control to the governing body are sufficient for the governing body to assess the state of control and effectiveness of risk management.

Risk Management and Controls Register 2021 – 2022

1. Failure to comply with statutory obligations and regulations such as those covering environment, health and safety, employment and human rights							
School priority area	Specific	Severity of impact 1=Low 2=Medium 3=High	Likelihood of Impact 1=Low 2=Medium 3=High	Risk Score (SXI)	Attitude to Risk	Risk Treatment	Responsibility
L&M	Failure to comply with requirement to have statutory policies and other documentation in place and available/published appropriately.	3	1	3	Treat	Ensure cycle for policy renewal is reviewed at least annually and included in schedule for Trustee review.	SYS
L&M	Failure to comply with code of practice for admissions	2	1	2	Treat	At least annual review of code of practice. External advice and guidance from LA. Internal working group. Trustee overview.	SYS
CTLA	Incorrect storage and use of chemicals and radio-active materials used for educational purposes	3	1	3	Treat	Annual risk assessment undertaken with support from H&S officer and discussed during SLT/HoD meetings at least annually. Curriculum risk assessments. CLEAPS	NAR
CTLA	Failure to comply with examination procedures.	3	1	3	Treat	Annual assessment of regulations by examinations officer and DH for CTLA. Line management 121 with senior leader.	NAR
CTLA	Examination venue(s) inaccessible	3	1	3	Tol	Work with other local venues / centres.	NAR
CTLA	Key staff unavailable during significant exam-related activities.	3	1	3	Treat	HT has access to controlled area. An assessment of critical tasks will be undertaken with cover arranged.	NAR
UoR	Failure to implement policies relating to employment and treatment of staff	2	1	2	Treat	External service support, incl legal, occupational health. Annual cycle of policy review. Good industrial relations.	AGH
UoR	Failure to comply with code of practice for the management of information	2	1	3	Treat	Information policy. Data protection registration. Acceptable use policies in place. Password protection in use.	AGH
UoR	Failure to adhere to Education Funding Agency's Academy Financial Handbook, Charities Commission and Companies House regulations	2	1	3	Treat	Annual assessment of statutory requirements following publication of EFA documentation and other relevant publications. Full consideration of the changes by Resource and Finance Committee.	AGH
UoR	Failure to meet general health and safety standards	3	1	3	Treat	Qualified H&S officer in post. Annual statutory inspections. Annual cycle of risk assessment review. Internal H&S working group. H&S link governor audit.	AGH
PDBW	Failure to deal effectively with serious safeguarding issues.	3	1	3	Treat	Regular safeguarding training for all staff, including radicalisation, online threats, self-harm and mental health. Internal and external safeguarding strategies implemented, including CPOMS. Support from LA. Designated SENCO and CP leads. Interagency collaboration. Link Trustee audit.	SOR
PDBW	Failure to fulfil responsibilities to students, including SEND, welfare etc.	2	1	2	Treat	Regular training for all staff. Designated SENCO and Student Support Co-ordinator. Internal and external support strategies implemented, including CPOMS. Interagency collaboration. Link Trustee audit. Key stage leader posts. Form tutor development.	SOR
PDBW	Classroom environment and student behaviour/codes of conduct	2	1	2	Treat	Behaviour policy. Key Stage Leaders with responsibility for PDBW. Robust monitoring.	SOR

2. Poses a threat to the achievement of educational objectives, including failure to take opportunities to improve standards within the school

Category	Specific	Severity of impact 1=Low 2=Medium 3=High	Likelihood of Impact 1=Low 2=Medium 3=High	Risk Score (SXI)	Attitude to Risk	Risk Treatment (Incl Target Date)	Risk Owner
L&M	The Academy Trust cannot attract board members with sufficient skills and experience, compromising leadership and vision and poor decision making.	3	3	9	Treat	Review of Trustee skills, constitution and academy operating documentation. Local authority training engagement. School Improvement Partner advice and support. Key link governor roles.	Members / Trustees
L&M	Inability to recruit or retain high calibre staff. Shortage of staff in key leadership and curriculum areas.	3	1	3	Treat	Whole-school Leadership development programmes. Performance Management. Induction and probation for new staff. Succession planning. Careful recruitment. High standards and employment practices to attract high calibre of candidate. Regular review of provision.	SYS
L&M	Loss of funding due to student numbers.	2	2	4	Treat	Continue to build on school's excellent reputation for academic achievements and student opportunities. Take account of student numbers in medium-long term strategic planning.	SYS
L&M	Delivery of statutory curriculum.	3	1	3	Treat	Regular assessment of curriculum provision. Staff structure appropriate: Deputy Head for CTLA. Heads of Department and Curriculum Co-ordinators. Training programmes and other development opportunities. Remote teaching facility. Regular review	SYS
UoR	Over-reliance / dependence on key staff	2	2	4	Treat	Assessment of succession planning of key high risk areas to be undertaken. Performance management and development opportunities. Career opportunities through TLR framework. Critical skills assessments.	AGH
UoR	Loss of funding or increased overheads due to changes in local and national formula, external environmental and political changes eg, pensions, NI, national pay frameworks.	3	3	9	Treat	Budget closely aligned to school improvement planning. Keep abreast of national pay and conditions and influencing factors. Maintain medium-long term strategic financial planning. Sensible end of year reserves. Regular reviews of EFA developments through newsletters and school communications. Appropriately trained and experienced finance team.	AGH

3. Failing to fulfil a duty of care to those that the school comes into contact with

Category	Specific	Severity of impact 1=Low 2=Medium 3=High	Likelihood of Impact 1=Low 2=Medium 3=High	Risk Score (SXI)	Attitude to Risk	Risk Treatment (Incl Target Date)	Risk Owner
PDBW	Failure to protect students and adults	3	1	3	Treat	Team of leaders with dedicated responsibility. Relevant policies with regular cycle of review (student and staff related). Staff training. Focused aspects of school improvement planning, self-review and evaluation.	SOR
PDBW	Failure to support SEN students or others with additional needs	2	1	2	Treat	SENCO and Student Support Co-ordinator with dedicated responsibility under the leadership of Deputy Head (PDBA). Key Stage Leader monitoring and senior leadership reporting. Use of assessment and subject self-review.	SOR
L&M	Incident on school trip	3	1	3	Treat	Policy for school trips and senior leadership approval of arrangements and risk assessments. Process of post-visit evaluation. Major incident policy.	SYS
L&M	Failure to recruit appropriate adults to work with children and young people.	3	1	3	Treat	Compliance with safer recruitment policy. Staff central register. DBS checks. Volunteer policy and agreement.	SYS
UoR	Failure in employer duty of care: Healthy workforce	2	1	2	Treat	Occupational Health Services. Staff stress assessments, activity and support. Access to annual vaccination programme. Directed time and staff consultation. Staff working alone arrangements, including working in isolated areas of school and out of hours. Employment related policies. Full compliance with extraordinary health risk management scenarios eg pandemic.	AGH
UoR	Failure to provide safe access to the building and a safe working environment.	2	2	4	Treat	Accessibility policy and annual review. Internal health and safety working group led by trained H&S co-ordinator. Stair lift installation. Security cameras. Reception and visitor control. Risk assessments. Lock-in and lock-down procedures.	AGH
UoR	Unable to provide cooked meals	2	1	3	Tol	Appropriately trained catering team. Source alternative temporary provision, including purchase or making of cold lunches.	AGH

4. Loss or deterioration of assets above and beyond normal wear and tear

Category	Specific	Severity of impact 1=Low 2=Medium 3=High	Likelihood of Impact 1=Low 2=Medium 3=High	Risk Score (SXI)	Attitude to Risk	Risk Treatment (Incl Target Date)	Risk Owner
UoR	Equipment in a poor state of repair	1	2	3	Treat	Annual Area resource planning by heads of department with dedicated prioritised annual budget.	AGH
UoR	Failure of ICT infrastructure and data	3	3	9	Treat	Dedicated ICT support team and service agreement with external consultancy. Backup procedures and use of cloud storage. Remote teaching and learning facilities.	AGH
UoR	Damage or loss through theft, fire, flood, vandalism.	3	1	3	Treat	Security cameras. Dedicated estates team. Department risk assessments (including practical subjects). Annual assessment of estate-wide risk with use of external services. Statutory inspections. COSHH compliant storage of chemicals. Insurance inspections. Insurance cover.	AGH
UoR	Fraud: loss of funds	2	2	3	Treat	Robust framework of financial controls, including financial policies, authorised signatories, password protected data. Use of cashless payment methods to reduce amount of cash stored on premises. Regular monitoring and financial reporting of all transactions, including payroll. External and internal scrutiny and audit. Trustee link. Insurance cover.	AGH

5. Potential damage the school's reputation and undermine public confidence

Category	Specific	Severity of impact 1=Low 2=Medium 3=High	Likelihood of Impact 1=Low 2=Medium 3=High	Risk Score (SXI)	Attitude to Risk	Risk Treatment (Incl Target Date)	Risk Owner
PDBW	Fall in behaviour standards	2	1	2	Treat	Key Stage Leaders with specific responsibility. Behaviour policy. Monitoring use of SIMS and CPOMS. Data reporting to senior leaders. Staff development. Use of assemblies, Police liaison officer and other opportunities to reinforce expected standards. Staff training.	SOR
L&M	Fall in regulatory judgements	3	1	3	Treat	All staff aware of Ofsted criteria and required standards. Targeted training (Ofsted, data, SEF, development planning). Leadership development. Annual review of school vision. Annual cycle of school improvement planning, area improvement planning and self evaluation.	SYS
L&M	Trade union action	1	1	2	Treat	Regular meetings with internal representatives and external where appropriate. JCNC relationships maintained. Good staff consultation. Keep abreast of external influences.	SYS
L&M	Fall in educational standards	3	1	3	Treat	Senior and middle leader development and improved focus on teaching and assessment. Targeted training Regular review of subject data. Annual review of performance. Annual cycle of school improvement planning, area improvement planning and self evaluation.	SYS
L&M	Staff professional conduct	3	1	3	Treat	Professional conduct policy. SLT monitoring of standards. Leadership standards.	SYS
L&M	Adverse media attention	2	1	2	Treat	Use of external media consultation service for advice and guidance. Good communication with parents and local community.	SYS

6. Failing to protect the environment from the actions of the school itself or from others operating within the boundaries of the school

Category	Specific	Severity of impact 1=Low 2=Medium 3=High	Likelihood of Impact 1=Low 2=Medium 3=High	Risk Score (s x l)	Attitude to Risk	Risk Treatment (Incl Target Date)	Risk Owner
UoR	Failure to manage and maintain the school site	3	1	3	Treat	Regular review of estate condition. Risk assessments. Dedicated budget. External funding bids. Facilities and Services manager and dedicated estates team. External support and advisory services. Statutory inspection cycle. Governor link.	AGH
UoR	Construction / contractors	3	1	3	Treat	Property consultants. Pre-contract construction meetings. Pre-contract vetting (large construction). Use of recognised companies with appropriate certification and accreditation.	AGH