



# Risk Management and Controls Policy

<b>Policy title:</b>	Risk Management and Controls
<b>Function:</b>	<p>The school faces many different risk issues that, if poorly managed, might have a detrimental impact on its ability to achieve its vision.</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>
<b>Status</b>	Approved
<b>Statutory guidance:</b>	<p>Academy Trust Handbook 2023 and Academy Funding Agreement (Education and Skills Funding Agency)</p> <p>Department for Education Academy Trust Risk Management Guidance (September 2023)</p>
<b>Audience:</b>	Staff, Leaders, Trustees
<b>Ownership:</b>	Senior Leaders
<b>Last reviewed:</b>	November 2023
<b>Reviewed by:</b>	Audit and Risk Committee / Board of Trustees
<b>Next review:</b>	Autumn 2024

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# Aims and Objectives

At the Blue Coat School our vision is simple. All that we do is focused on developing exceptionally well-rounded individuals with the skills to thrive and positively contribute in a rapidly changing society.

This is underpinned by our unrelenting focus on:

## **Inspiring excellence**

Excellence is not something that is simply achieved. It something that we always strive for so that we can continually create opportunity and enhance the life chances of talented young people from broad and diverse backgrounds. The best is not, however, always the easiest. Our staff and learners will be resilient, and able to overcome barriers and challenges to ensure that potential is unlocked.

## **Shaping character**

Our learners leave us not just knowing how to do things, but how to do things in the right way for the right reasons. That is why humility and integrity are the key pillars of our community, and the basis for how we treat one another. They ensure we have a culture where individuals are treated with care and compassionate respectfulness.

## **Forging futures**

Every member of our community will leave us embracing their strengths and with ambition and aspiration as to how they can contribute positively to the modern world they are entering. Our students will become the leaders of tomorrow.

By extension, our values, approach and ethos are embodied in, and implemented through, our policies and procedures. They are the framework to support all that we do and achieve.

- 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 Academy Trust 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;
- contribute 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. Trustees who lead on governance in areas of school will consider relevant risks and include details in their report to the Board of Trustees.
- 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 implement 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 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 Identified risks have been prioritised with key risks included in the Risk Management and Controls Register (Annex A). Risks generally fall into the following categories: Governance; Leadership and Management; Compliance; provision for students.

- 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.

<b>Score 9 High risk</b> <b>Score 3-6 Medium risk</b> <b>Score 1-3 low risk</b> <b>(Risk score = SxL)</b>		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 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 Audit/Risk and Finance and Resource Committees to ensure it reflects the current position for the school.

# Risk Management and Controls Register 2023 – 2024

Risk Description	Impact 1=Low 2=Medium 3=High	Likelihood 1=Low 2=Medium 3=High	Risk Score (SXI)	Attitude to Risk	Risk Treatment	Responsible
Failure to respond to the <b>risks and opportunities</b> associated with changes to the environment, including financial and political agendas for education, local authority provision, local planning.	2	1	2	Treat	<ul style="list-style-type: none"> <li>Lead trustees appointed to relevant areas</li> <li>Senior leaders keep abreast of key changes.</li> <li>Senior leadership engagement with local authority partnerships, collaborative groups and networking</li> <li>Trustees keep abreast of key issues affecting governance and engagement with relevant networking opportunities</li> <li>Assessment of changes as part of the schools pmre processes, together with development of school improvement strategies.</li> <li>Deployment of relevant working groups eg MAT working group</li> </ul>	HT Board of Trustees
The school experiences a <b>Health, Safety, or security</b> breach	3	1	3	Treat  Transfer	<ul style="list-style-type: none"> <li>Lead H&amp;S trustee to provide additional level of scrutiny, reporting to finance and resource committee</li> <li>Identified H&amp;S co-ordinator</li> <li>Specialist support through local authority service level agreements</li> <li>Routine external audit and inspections, including H&amp;S, fire risk prevention, water testing cyber, safeguarding and e-safety.</li> <li>Relevant policies and risk assessments reviewed and evaluated</li> <li>Induction and professional development programmes</li> <li>Internal H&amp;S committee with representatives from areas of school attended by link trustee</li> <li>Appropriate levels of insurance</li> </ul>	HT DoR  FRC  Lead trustee
The school lacks a board of trustees who are suitably knowledgeable, skilled and experienced in governance and able to <b>ensure legislative compliance and appropriately hold senior leaders to account.</b>	3	1	3	Treat	<ul style="list-style-type: none"> <li>Annual review of board membership and structure</li> <li>Annual evaluation of work of the board aligned with the school's pmre self evaluation process.</li> <li>Trustees to ensure familiarity with key strategic and operational documentation to ensure they are fully aware of expectations, including: Articles of Association, Funding Agreements, Academies Financial Handbook, Governors Handbook.</li> <li>Annual skills audit</li> <li>Recruitment strategy</li> <li>Engagement in relevant development opportunities</li> <li>Trustee policy and scheme of delegation regularly reviewed</li> <li>Trustees take an interest in the work of the school and proactively meet with identified SLT links to enable informed decisions to be made</li> <li>Scrutiny of school improvement plans</li> <li>Support from Governance Professional</li> </ul>	Board of Trustees

The school lacks direction through poor <b>strategic and operational planning</b> .	3	1	3	Treat	<ul style="list-style-type: none"> <li>Vision developed, setting out the key aims and objectives, regularly reviewed and shared with all stakeholders.</li> <li>School improvement plan supports vision. Shared with stakeholders and is reviewed termly by senior leaders and trustees. Trustees work closely with senior leaders to challenge, monitor and review progress.</li> <li>Financial plans are aligned with strategic priorities and performance is closely monitored by senior leaders and finance and resource committee. Full budget monitoring shared with The Board on monthly basis.</li> <li>Statutory and non-statutory policies are developed, monitored and evaluated to support the school's vision</li> </ul>	Board of Trustees  HT FRC DoR
The school is unable to meet its strategic objectives due to the failure to <b>recruit and retain a high-quality workforce with key skills and expertise</b> .	2	2	4	Treat	<ul style="list-style-type: none"> <li>Regular workforce monitoring statistics reported to finance and resource committee.</li> <li>Leaders keep abreast of developments and good practice to ensure theory and practice is up to date.</li> <li>A culture of professional learning is encouraged supported by focussed development strategies and significant investment.</li> <li>Secondment opportunities for key roles.</li> <li>Succession planning strategy being prepared with a focus on leadership.</li> <li>National pay and conditions and other benefits</li> <li>Good professional association relationships</li> </ul>	HT FRC DoR
Failure to monitor the effect of risks over which the school has little or no control such as <b>disruption to educational provision</b> caused by pandemic and other major incidents including those limiting access to the school estate.	3	1	3	Treat	<ul style="list-style-type: none"> <li>Cyber response plan</li> <li>Major incident/business continuity plan</li> <li>External communications/media support</li> <li>ICT infrastructure to support remote working</li> <li>Student Support services</li> <li>Appropriate levels of insurance reviewed by trustees annually</li> <li>Property consultant services</li> </ul>	ARC  Senior Leaders
Failure to ensure that <b>Information</b> is safe and maintained to the highest standard in accordance with regulations.	3	2	6	Treat	<ul style="list-style-type: none"> <li>Lead trustee provides additional scrutiny of procedure and practice</li> <li>Registration with Information Commissioner and identified Data Protection Officer.</li> <li>Information policy outlining responsibilities and practices to comply with General Data Protection Regulations.</li> <li>Cyber Response Plan to reduce risk of cyber attacks</li> <li>Internal and external audits</li> <li>Professional development for data leads and others as necessary.</li> <li>Breaches are reported immediately to senior leaders and response agreed.</li> <li>Financial management policies, systems and processes in place that prevent fraud.</li> <li>Cyber insurance through Government Risk Protection</li> </ul>	Board of trustees FRC HT DoR Lead trustee
Meet the <b>needs of students</b> , including welfare and SEND	3	1	3	Treat	<ul style="list-style-type: none"> <li>Link trustee to provide additional layer of scrutiny.</li> <li>Designated SENCO and student support team.</li> <li>Internal and external support strategies implemented including CPOMS.</li> <li>Interagency collaboration.</li> <li>Key stage leader posts.</li> <li>Professional development programme</li> </ul>	Board of Trustees HT DHT Lead trustee

Failure to ensure compliance with <b>safeguarding requirements</b> under Keeping Children Safe in Schools.	3	1	3	Treat	<ul style="list-style-type: none"> <li>Lead trustee provides additional scrutiny of procedure and practice</li> <li>Safeguarding policies developed and shared.</li> <li>Policies reviewed by the board of trustees</li> <li>Annual review of Keeping Children Safe in Education by all staff and trustees</li> <li>Scheduled professional development sessions</li> <li>Trained DSLs in place</li> <li>Identified contacts with outside agencies, including Local Authority Designated Officer (LADO)</li> </ul>	BoT HT DHT Lead trustee
The school experiences an unexpected <b>decline in performance</b> through outcomes for students (standards of achievement and progress).	3	1	3	Treat	<ul style="list-style-type: none"> <li>Lead trustee (Curriculum) provides additional scrutiny of procedure and practice</li> <li>Deputy Head with responsibility for strategic oversight of curriculum provision.</li> <li>Experienced Curriculum Team Leaders with responsibility for developing high quality curriculum plans and schemes of work</li> <li>Structured school improvement plans developed and supported by area improvement plans in all curriculum areas.</li> <li>Performance closely monitored by experienced senior leaders and variances/downward trends promptly addressed.</li> <li>Regular reporting and review by experienced senior leaders supported by use of key performance indicators.</li> <li>Further level of scrutiny at trust board level.</li> <li>School improvement partner to provide appropriate levels of support and challenge.</li> <li>Lead trustee for teaching and learning to provide an additional layer of scrutiny.</li> </ul>	Board of Trustee HT DHT  Lead trustee
The school fails to follow <b>examination board procedures</b> for the assessments and release of results.	3	2	6	Treat	<ul style="list-style-type: none"> <li>Lead trustee (Curriculum) provides additional scrutiny of procedure and practice</li> <li>An agreed examination procedure that is compliant with exam board regulations is in place and verified as compliant by senior leaders and examination boards.</li> <li>The conduct of all assessments is overseen by the headteacher and deputy headteacher.</li> <li>An experienced examinations officer/data manager is employed to work closely with the senior leader in charge of assessment.</li> <li>Identified support for critical tasks in the event of absence.</li> <li>Full training is given to all staff involved in the process, including invigilation.</li> <li>Release or upload of examination data is undertaken by the examinations officer and overseen by the responsible senior leader.</li> <li>Senior leaders are notified immediately of any breach of examination regulations and support is sought.</li> </ul>	Board of Trustees HT DHT  Lead trustee
Failure to comply with <b>Admissions Code of Practice</b>	2	1	3	Treat	<ul style="list-style-type: none"> <li>Lead trustee (Admissions) provides additional scrutiny of procedure and practice</li> <li>Senior leader oversight</li> <li>Policies and procedures reviewed on a regular basis</li> <li>Support from the local authority</li> <li>Independent appeals panel</li> <li>Review and evaluation process, including trustee scrutiny</li> </ul>	Board of Trustees HT Lead trustee

Key HT=Headteacher BoT= Board of Trustees ARC= Audit and Risk Committee FRC= Finance and Resource Committee DoR= Director of Resources DHT = Deputy Head teacher