

CHANCERY MULTI ACADEMY TRUST



RISK MANAGEMENT POLICY

The Risk Management Policy in respect of Chancery Multi Academy Trust has been discussed and adopted by the Directors Board

Chair of Board: *Ros Caulfield*

Responsible Officer: *CEO - Lise Houldsworth*

Agreed and ratified by the Directors Board on: *14th May 2018*

To be reviewed: *May 2021*

Risk Management Policy

1.0 Introduction

- 1.1 The Trust seeks to achieve for its member schools to deliver, through partnership and collaboration, an outstanding learning experience for all children so they flourish and thrive; enabling them to achieve their own individual excellence.
- 1.2 Risk management is the process whereby the Trust and its schools methodically addresses the risks attached to its objectives and associated activities with the goal of achieving sustained benefit within each activity and across the whole range of activities.
- 1.3 Risk management will be aimed at ensuring that the Trust achieves its objectives in the most effective way and those resources are effectively directed at those objectives. It will not be seen as a separate exercise but as the means of best achieving the Trust's objectives.
- 1.4 This risk management strategy has been designed to provide a framework for managing the risks the Trust and its schools face and ensuring its objectives are achieved in the most effective way.
- 1.5 It has been designed for use by all staff of the Trust and its schools and it serves to:
- Communicate the strategies for managing risk in the Trust and its schools
 - Establish procedures which should be adopted in the risk management process

2.0 The Aims and Objectives of Risk Management

- 2.1 The Trust's overall risk management plan is aimed at:
- Protecting its students, staff and assets
 - Managing risk in accordance with best practice and reducing the cost of risk
 - Anticipating and responding to changing social, environmental and legislative requirements
 - Raising awareness of the need for risk management
 - Integrating risk management into the culture of the Trust and its schools
 - Adopting legal compliance and good educational quality as a minimum standard
- 2.2 These aims and objectives will be achieved by:
- Establishing and maintaining a risk management organisational structure to act in an advisory and guiding capacity which is accessible to all staff
 - Maintaining documented procedures for the control of risk
 - Providing suitable information, training and supervision
 - Maintaining effective communication and the active involvement of all staff
 - Maintaining an appropriate incident reporting and recording system, with investigation procedures to establish cause and prevent recurrence
 - Monitoring arrangements on an ongoing basis

3.0 The Potential Benefits of Risk Management

3.1 Effective risk management protects and adds value to the Trust, its schools and its stakeholders through supporting the Trust's objectives by:

- Improving decision making, business planning and prioritisation by comprehensive and structured understanding of the wider business environment
- Supporting more efficient allocation and use of resources within the Trust and its schools
- Enhancing communication between schools and services
- Protecting and enhancing the Trust assets and image
- Developing and supporting staff and the Trust's knowledge base
- Helping to focus the internal audit plan

4.0 The Structure and Administration of Risk Management

4.1 The Trust has a fundamental role to:

- Set the tone and influence the culture of risk management within the Trust and its schools
- Determine the appropriate risk appetite or level of exposure for the Trust
- Approve major decisions affecting the Trust's risk profile or exposure
- Set policy and strategy for risk management
- Frequently monitor the management of significant risks to reduce the likelihood of unwelcome surprises or impact
- Satisfy itself that the less significant risks are being actively managed, with the appropriate controls in place and working effectively
- Annually review the Trust's approach to risk management and approve changes or improvements to key elements of its processes and procedures

4.2 The Trust's Senior Officers will:

- Support and implement policies approved by the Trust
- Establish internal risk policy and structures for individual school / services
- Develop risk response processes, including contingency and business continuity programmes
- Provide adequate information in a timely manner to the Trust and its Audit Committee on the status of risks and controls
- Focus and co-ordinate risk management activities throughout the Trust
- Raise the level of management awareness and accountability for the business risks experienced by the Trust and its schools
- Develop risk management as part of the culture of the Trust and its schools
- Provide a mechanism for risk management issues to be discussed and disseminated to all areas of the Trust

4.3 The Headteacher and Senior Leadership Team in the Trust school's will:

- Have primary responsibility for managing risk in the schools on a day-to-day basis
- Have responsibility for promoting risk awareness within their operations; introduce risk management objectives into their businesses
- Identify and evaluate the significant risks faced by their operations for consideration by their Local Governing Board and the Trust's Senior Officers if identified as a Trust risk
- Ensure that risk management is incorporated at the conceptual stage of projects as well as throughout a project
- Ensure that risk management is a regular management meeting item to allow consideration of exposure and to prioritise work in the light of effective risk analysis
- Report early warning indicators to the Trust's Senior Officers

5.0 Risk Identification

- 5.1 Risk is not only about adverse events, it is also about missed opportunities. All areas of activity within the Trust and partnerships with third party organisations should be considered together with what would stop them being as successful as they should be. The key risks that the Trust faces will be those that would stop it achieving its objectives in these areas.
- 5.2 As the first step in the risk identification process all staff with responsibility for delivering operations aims or targets need to understand the Trust's corporate objectives and the legal and regulatory environment in which it operates.
- 5.3 The second step is the translation of these objectives into operating aims in the form of appropriate operational plans and performance indicators for each area of activity. This should be an ongoing annual exercise with regular updating of the aims.
- 5.4 The next step is to identify what would stop each area being as successful as it should be. Risks can readily be identified through either brainstorming or a more structured approach.
- 5.5 Risks will be grouped into categories. Each category will be overseen by a Senior Trust Officer. That officer is responsible for overseeing the relevant section of the Risk Register and ensuring that it is appropriately updated for reporting to the Trust's Directors and Audit Committee. The officer will also help individual schools and their local governing bodies to construct and update the relevant section of their risk register.

Risk Category	Description	Senior Trust Officer Responsible
Strategic	Concern the long-term strategic objectives of the Trust and its schools. They can be affected by such areas as capital availability, legal and regulatory changes, reputation and changes in the	Chief Executive Officer

	physical environment. For example, failure to recognise sector message.	
Operational	Concern the day-to-day issues that the organisation is confronted with as it strives to deliver its strategic objectives. For example, failure to maintain timely and accurate learner data.	Head Teachers
Financial	Concern the effective management and control of the finances of the Trust and the effects of external factors such as interest rate movement and other market exposures. For example, failure to balance budget.	Chief Finance Officer
Compliance	Concern such issues as health and safety, environmental, trade descriptions, consumer protection, data protection, employment practices and regulatory issues. For example, breach of employment laws.	Chief Finance Officer

5.6 The risks that have been identified should be recorded on the risk template and updated to the register for each applicable school or service and incorporated, as necessary, into the overall Trust risk register.

6.0 Risk Estimation (Assessing Likelihood and Impact) – Trust and its Schools' Guidelines

6.1 Having identified the risks that the Trust is facing, they need to be prioritised into a manageable order so that action can be focused on the significant risks. At this stage in the risk management process you should only be concerned about the risks that threaten the achievement of your operating aims and objectives. Risk prioritisation will enable necessary action to be taken at the relevant level of management in the Trust and its schools.

6.2 Each risk should be assessed in terms of the **likelihood** of its occurrence, and its **impact** on the Trust, should it occur.

6.3 Not all risks will affect the Trust with the same impact, and some are far more likely to occur within the Trust and its schools than others. For example, there is perhaps a low likelihood of fire at a school but there would be significant disruption if the buildings were burnt down. There may be a greater likelihood of petty thefts but the impact is deemed less than a fire.

6.4 The impact of a risk and the likelihood of it occurring should be scored as follows:

- **Likelihood**

For each of the risk you have listed assess the likelihood of their occurrence on the following scale:

1. extremely unlikely; rare occurrence
2. unlikely
3. moderately unlikely
4. very likely, regular occurrence
5. highly likely
6. extremely likely; frequent occurrence

- **Impact (financial/reputational)**

Also assess their impact on the following scale:

1. not critical to continued operations
2. minor impact in limited areas
3. minor impact in many areas
4. significant impact; would not affect continued operations in short-term but might in long-term
5. significant impact; in medium term; relates to substantial operational areas
6. fundamental to continuing operations

Financial and Reputational Impact are scored separately and the two scores are added to give the total Impact score

6.5 Multiply the scores for likelihood and impact (Financial and Reputational) and then rank the risk by numerical value, e.g.

Major fire	impact 6	likelihood 2	total = 12
Small scale theft	impact 1	likelihood 3	total = 3

7.0 Risk Prioritisation

7.1 Risks should be prioritised as follows:

Risk Score	Prioritisation	Colour	Action
1 to 14	Low	Green	Keep under review
15-24	Medium	Amber	Consider action or contingency plan
>25	High	Red	Immediate action

8.0 Risk Mitigation

- 8.1 Once risks have been identified and prioritised, you need to decide how the Trust and its schools is going to address them.
- 8.2 As the first step, you should assess the 'cost' of accepting the risk. This may be a financial cost or a lost opportunity. You may decide that accepting a particular risk is appropriate and not take any further action.
- 8.3 If you decide further action is needed then there are three main options:
- avoid the risk
 - transfer all or part of the risk
 - mitigate the risk
- 8.4 A risk may be avoided by withdrawing from that area of activity but doing so may result in a missed opportunity.
- 8.5 A risk may be transferred wholly or in part to a third party, possibly through insurance or a partnership arrangement.
- 8.6 In the majority of cases, the next step will be to put in place systems to mitigate either the likelihood or the impact of the risk. These will include systems addressing the whole operation of the Trust and its schools as well as the areas where risks have been identified. Any system of risk mitigation should provide as a minimum:
- Effective and efficient operation of the Trust and its schools
 - Effective internal controls
 - Compliance with law and legislation
- 8.7 Mitigating action plans should be recorded against each risk that has been listed in the risk register with appropriate milestones. In order for an action plan to be successful the action plans should be:
- Smart
 - Measurable
 - Achievable
 - Realistic
 - Time constrained

They should also include sources of assurance over the controls in place to mitigate each risk identified.

- 8.8 Source of Assurance is defined as evidence that mitigating action/controls are in place and being regularly reviewed. As part of the monthly risk review the Assurance should be reviewed to ensure that the mitigating action/controls are appropriate and functioning. The residual risk should also be considered at each review if Assurances indicate that mitigating actions/controls are working better/worse than originally planned.

9.0 Gross and Net risk

- 9.1 In completing the above mentioned assessment of risk, recognition needs to be given to the impact of the mitigating actions taken by management to reduce the impact of the risk. Accordingly, risks should initially be recorded at their gross value – the impact without mitigating actions. The same risks should then be recorded allowing for the impact of the mitigating actions. By doing so, the Trust is able to value the impact of the mitigating factors to determine whether they are cost effective.
- 9.2 Both the gross risk and net risk scores are to be recorded on the Risk Register and the Risk Reduction Plan.
- 9.3 The movement in these risk scores between reporting periods are to be recorded on these key documents to enable the reader to understand whether each risk is constant, decreasing or increasing over time.

10.0 Risk Monitoring

- 10.1 The likelihood or impact of an identified risk can change for a number of reasons including:
- Nature of the risk has changed or is changing
 - Existing controls are inadequate or not functioning
 - New controls are introduced
- 10.2 Early warning indicators should be designed for each risk to alert management to the situation effectively. These should have triggers, be described in the register and be highlighted in monthly reports to management and the Trust. Key characteristics of monitoring mechanisms are:
- Information must reach the level of management where decisions can be made
 - Mechanisms must pick up the problem before it happens, or at least before it gets too serious.
- 10.3 Individual schools should:
- Review monthly the risks which fall into their area of responsibility, the possible impacts these have on other areas and the consequences other areas may have on them
 - Use performance indicators to monitor the key business and financial activities, progress towards objectives and identify developments which require intervention
 - Have systems which communicate monthly variances in budgets and forecasts to allow action to be taken
 - Report systematically and promptly to the Chief Finance Officer any perceived new risk or failures of existing mitigating or control measures
- 10.4 The Chief Executive Officer and Chief Finance Officer should:
- Ensure that the Corporate Risk Register is updated in the light of developments within the Trust and its schools and the wider business environment

- Review the Corporate Risk Register monthly
- Review key performance indicators and progress towards objectives
- Take necessary action to address adverse departures for objectives
- Provide adequate information to the Trust's Audit Committee on the most significant risks

10.5 The Audit Committee should:

- Review the Corporate Risk Register, Risk Reduction Plan and the Internal Audit monitoring document at its meetings
- Provide ongoing advice on the effectiveness of the risk management process

11.0 Risk Reporting

11.1 Different levels within the Trust and its schools need different information from the risk management process.

11.2 Early warning indicators should be reported systematically and promptly to senior management to allow action to be taken. The frequency of reporting should be related to how quickly a risk can materialise and its likely impact.

11.3 Staff should:

- Understand their accountability for individual risks
- Understand that risk management and risk awareness are a key part of the School's culture
- Understand how they can enable continuous improvement of risk management response
- Report systematically and promptly to senior management any perceived new risks or failures of existing control measures

11.4 Schools should:

- Report to the Local Governing Board the outcome of their monthly review of business and financial activities and progress towards objectives
- Report systematically and promptly to the Chief Finance Officer any perceived new risks or failures of existing control measures

11.5 Chief Executive Officer and Chief Finance Officer should:

- Review the findings of the Schools
- Ensure accurate reporting of risk in terms of issue and risk values
- Assess each risk for reporting to the Audit Committee and the Trust.
- Ensure appropriate levels of awareness throughout the Schools

11.7 The Trust should:

- Report annually on the effectiveness of the risk management process in the Trust and its schools
- Report to the Trust's stakeholders on a regular basis its risk management policies and the effectiveness in achieving its objective