

# Risk Management Policy and Procedures

<b>Author/Owner (Name and Title)</b>	Helen Young - Head of Governance, Policy and Communications
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	2	Academy specific appendices
	3	Academy personalisation required (in highlighted fields)

## Summary of Changes from Previous Version

Version	Date	Author	Summary of Updates
V8	May 2023	H Young	<p>New policy template</p> <p>Page 6 – updated risk management cycle graphic &amp; new paragraph relating to School Improvement Risk Register</p> <p>Page 6 – updated Risk area 5 name to Estates</p> <p>Page 7 – Updated text and tables to reflect new scoring (1-3)</p> <p>Page 8 – Updated Response table</p> <p>Appendix 2 - Updated text and tables to reflect new scoring (1-3)</p> <p>Appendix 4 – updated plan headings with new response actions</p> <p>Appendix 5 – New appendix to show example of School Improvement Risk Register</p> <p>Appendix 6 – New appendix to show education risk descriptors specific to the School Improvement Risk Register</p>
V9	March 2024	H Young	No Changes to Content, update on font in Appendix 1

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## Introduction and Purpose of this Document

This Risk Management Policy (the policy) forms part of the Trust's internal control and corporate governance arrangements. It also explains the Trust's underlying approach to risk management, documents the roles and responsibilities of the board of governors, the Risk Management Group and other key parties. It also outlines key aspects of the Risk Management Process, and identifies the main reporting procedures.

In addition, it describes the process the Local Governing Board and the Directors will use to evaluate the effectiveness of the Trust's internal control procedures.

Exceed Learning Partnership's aim is to provide the highest possible quality of education for all local children, in order to ensure pupils from all backgrounds are able to succeed.

The statements in this policy contribute to our approach to our structures and governance.

- The Exceed Learning Partnership is committed to minimising risk through a framework of integrated governance supported by a proactive risk management culture.
- Risk can be defined as the combination of the potential likelihood of an event and its impact. In managing our academies there is the potential for events and consequences that constitute opportunities for benefit (upside) or threats to success (downside). Risk Management is concerned with both positive and negative aspects of risk.
- In the safety field, it is recognised that consequences are only negative and therefore the management of safety risk is focused on prevention of harm.

## The Approach to Risk Management in Exceed Learning Partnership Trust

Risk management is a central part of our strategic management and culture. It is the process whereby we methodically address the risks attached to our activities with the goal of achieving sustained benefit within each activity and across the portfolio of all activities.

The focus of good risk management is the effective identification and treatment of risks. Its objective is to add the maximum sustainable value to all our activities. It focuses on understanding the potential upside and downside of all those factors, which can affect our organisation.

Employees at all levels throughout the Trust should include risk management and awareness of risk as a key element of their job description. This supports accountability, performance measurement and reward, thus promoting proactivity.

Key performance indicators for risk management shall be developed, implemented and reviewed to measure the effectiveness of the Risk Management Process.

The following key principles outline the Trust's approach to risk management and internal control:

- The Directors Audit and Risk Committee have responsibility for overseeing risk management within the Academy Trust as a whole;
- An open and receptive approach to solving risk problems is adopted by the Directors and the Local Governing Board (LGB);
- The CEO and the Executive Leadership Team supports, advises and implements policies approved by the Directors;
- The Academy Trust makes conservative and prudent recognition and disclosure of the financial and non-financial implications of risks;
- The LGB, Principal, Senior Leaders and members of the Academy Risk Management Group are responsible for encouraging good risk management practice within their designated academy; and
- Key risk indicators will be identified and closely monitored on a termly basis unless otherwise identified.

## Risk Management Cycle



### Identifying Risks

The process for risk identification cannot be centralised to a core team or function, it must be a fluid part of the day-to-day operation of the organisation and is best done as a joint effort with the focus on things that could adversely affect business objectives across the estate. Risk identification is a core competency and must be developed through the performance management process.

Exceed Learning Partnership Trust works to a framework of seven key areas to identify and classify risks. This allows the organisation to take into consideration both internal and external factors that can positively or negatively affect the organisation. A list of risks will be identified using a variety of techniques including data analysis, risk identification workshops, the establishment of Risk Management Groups in each Academy, options appraisals and incident investigation among others. An example list of typical categories of risks can be found at appendix 1.

Consideration will be given to the following factors:

- Risks Areas 1-6 (see table below) will be categorised into the following framework on the Trust and Academies Risk Register: (The Deputy CEO/COO) will maintain the Trust's Risk Register; the Business Managers should maintain the Academies Risk Register).
- Risk Area 7: School Improvement (see table below) will be categorised into a separate educational framework with its own education risk descriptors – **see appendix 6**. Academy Principal's and the CEO/Director of Primary are responsible for completing the School Improvement Risk Register with final versions being approved by the CEO/Director of Primary. The approved Risk Registers are presented to LGBs and the Trust Education and Standards Committee for monitoring in the form of a Headline Data Report – **See appendix 5**

Key Risk Area No.	Risk Areas	Examples
Area 1	<b>Strategic</b>	Academy/Trust development and performance e.g. Vision, beliefs, values and strategic goals, local, national and international political factors that can affect the organisation. social and cultural dynamics affecting the education system.
Area 2	<b>Operational</b>	Staffing & Resources e.g. Functions and issues that the academy may face due to transition to academy status. Management information and systems, HR and human capital, Income risks.
Area 3	<b>Health &amp; Safety</b>	e.g. Risk Assessments, fire procedures, school visits, academy forest schools
Area 4	<b>Financial</b>	e.g. internal or external micro- or macroeconomic factors.
Area 5	<b>Estates</b>	e.g. Security software, emergency planning, academy forest schools
Area 6	<b>Compliance</b>	e.g. Legal, regulatory and compliance matters
Area 7	<b>School Improvement</b>	e.g. Teaching and learning matters

### Assessment of Risk

Assessing risks must be discussed and agreed that all involved are satisfied with the lists of risks, assessment of the existing internal controls and determine appropriate action using the risk management strategy below. All risks requiring additional action must have an identified person to take responsibility for the action, review procedures should be discussed and how the reporting of actions will be conducted.

Risks will be assessed on two core criteria:

- **Likelihood:** the probability of the risk occurring
- **Impact:** the positive or negative ramifications of the risk coming to fruition.

## LIKELIHOOD x IMPACT = RISK RATING (Severity)

Both criteria will be scored on the risk register, between 1 (the lowest) and 3 (the highest). When multiplied together, the total provides a quantifiable risk profile. The risk profile will then determine the severity of the risk through a simple Red, Amber, Green framework.

<b>Risk Rating (severity)</b>	<b>RAG rating (Red, Amber, Green)</b>
1 ≥ 3	Green
4 ≥ 6	Amber
7 ≥ 9	Red

<b>Likelihood</b>		
*Likelihood scores are based on an event taking place within one academic year or less		
1	Low	Not likely to occur within a 4 year time period or less than 5% chance of occurrence
2	Medium	Likely to occur within a 4 year time period or less than 25% chance of occurring within the next 12 months
3	High	Likely to occur each year, or more than 25% chance of occurrence within the next 12 months

<b>Impact</b>		
1	Low	The financial impact is likely to be low [below £5,000 and £24,000] Has a low impact on strategy or on teaching and learning Low stakeholder concern Is unlikely to cause any reputational damage to the school
2	Medium	The financial impact will be moderate [between £25,000 and £49,000] Has no more than a moderate impact on strategy or on teaching and learning Moderate stakeholder concern Can cause moderate reputational damage to the school
3	High	The financial impact will be significant [in excess of £50,000] Has a significant impact on the school's strategy or on teaching and learning Has significant stakeholder concern Can cause significant reputational damage to the school

A risk matrix (see Appendix 2) will be used to plot each risk, these will then be recorded in the risk register.

The assessment of each risk will take into consideration the control measures currently in place to manage the risk. The controls identified will be assessed to determine whether they are an appropriate mitigation of the risks identified. The value for money of the chosen responses needs to be considered, i.e. it is as important to avoid over-control of minor risks as under-control of serious risks.

With this exercise complete, the Directors /LGBs will decide what their risk appetite is, (what level of risk they are willing to tolerate using the Risk Management Strategy below. This will determine what response the Directors / LGBs wishes to make to each risk.

## Risk Management Strategy

The Risk Management Strategy determines the way in which the organisation will respond to a risk.

## Response

The Trust has adopted three categories of risk response type:

Risk Rating	Risk Response	Description
1-2	Monitor and Minimise	Low or Relatively Insignificant Risk
3-4	Mitigate and Control	Medium risk that requires active Risk Controls
6-9	Remove and Restrict	Aggressive Controls and Restrictions

## Person Responsible/Actions Required/Risk Register

Any risks requiring treatment should be recorded in a risk register, areas to be considered as a risk have been identified in Appendix 3. The actions required to produce an acceptable control system must be identified in the appropriate column in the risk register which will in turn create the action plan to address the risk. It should be clear who the actions have been allocated to (person responsible) along with a deadline for the action to be completed. The person responsible will identify stakeholders with an interest in or affected by the risk and consult with them to establish their relationship with the risk and what influences this might have on the Risk Management Process.

	Sub Risk Description	Risk Consequences	Impact of Risk (Likelihood)	Impact of Risk (Severity)	Impact of Risk (Rating)	Existing Internal Controls	Existing Controls (fully or partially met)	Details of Actions Required	Person Responsible	Target Date	Revised Risk Score (Likelihood)	Revised Risk Score (Severity)	Revised Risk Score (Rating)
Row 1	Third party lettings	Risk of injury if not informed about H & S when entering the building Risk of letting premises to uninsured provider Risk of damage if not a viable reputable person	Low (1)	High (3)	3 Mitigate & Control Medium Risk that requires active Risk Controls	- Visitors to sign in at reception and receive H&S instructions - H&S procedures for the Trust and academies in place - Hirer insurance to be in place as part of Lettings Policy - Documentation check on provider premises let to - Insurance cover of all hirers requested Any queries discussed with Trust insurance provider - Fire procedure reviewed and temporary assembly point in place for the duration of roof works at Hill Top Academy visitors informed 3rd party hiring of Trust office has now ended reducing risk of damage to the building	Fully	N/A	DCEO		Low (1)	Medium (2)	2 Monitor & Minimise Low or relatively insignificant Risk

A final version of the register will be considered at the Directors Audit Committee meetings, a report identifying key risks will be produced by the Deputy CEO/COO and circulated to all Directors so that they are aware of the risk management and the controls in place to limit exposure to the risk.

## Monitoring and Review/Risk Response

The risk register will be monitored by the Deputy CEO/COO with any known risks not already identified on the academies risk register being brought to the attention of the Principal and Business Manager.

A final version of the risk register will be reviewed termly by Directors, Risk Management Groups and LGBs to ensure that risks are identified and that appropriate controls and responses are in place and to ensure that;

- New risks/escalating risks are identified
- Planned actions are carried out in line with agreed timescales
- Updating of the risk register as risks occur/change over time
- Early signs of developing risks are identified as early as possible

The Risk Management Group (Audit Committee) will consider the Risk Management Policy, Risk Register and the Risk Management Action Plan on an annual basis. They will prepare a report for the consideration of the Governing Board which:



- Identifies and evaluates the significant risks faced by the academy
- Makes recommendations concerning the content of the policy, action plan and register

The Directors will consider their report and approve any changes to the policy, the action plan and the register in the final meeting of the year.

LGBs will review the Risk Management Action Plan and the Risk Register and associated actions at the final meeting of each term. They will:

- Review the progress of the implementation of the Risk Management Action Plan
- Consider all risks, their status and their controls to ensure that they are still appropriate
- Where a weakness is identified agree clear actions, timescales and responsibilities.
- Update the action plan and the register as required.

Following this meeting a report of the review will be presented to the next meeting of the Directors. Governors will consider the report and its recommendations and approve any subsequent actions.

## Debrief

The final stage of the risk management cycle is to conduct a debrief after the implementation of the management strategy to assess the effectiveness of the strategy.

## Escalation

Risk should be understood and reported at all levels within the Trust.

### The Trustees should:

- know about the most significant risks facing the organisation through monitoring of the Risk Register;
- ensure appropriate levels of awareness throughout the organisation;
- know how the organisation will manage a crisis;
- know the importance of government and stakeholder confidence in the company; be assured that the Risk Management Process is working effectively; and
- publish a clear risk management policy covering risk management philosophy and responsibilities.

### Local Governing Bodies should:

- know about the most significant risks facing their school and have a local risk register;
- ensure appropriate levels of awareness throughout the local leadership and the Academy Risk Management Group;
- know how their Academy will manage a crisis;
- know the importance of government, parents and local community confidence in the schools;
- be assured that the Risk Management Process is working effectively;

### Principals' should:

- be aware of risks which fall into their area of responsibility, the possible impacts these may have on other areas and the consequences other areas may have on them;
- have performance indicators which allow them to monitor the key business and financial activities progress towards objectives and identify developments which require intervention;
- have systems which communicate variances in budgets and forecasts at appropriate frequency to allow action to be taken;
- report systematically and promptly to the Trustees any perceived new risks or failures of existing control measures highlighted within the Academy's risk register.

**Individuals should:**

- understand their accountability for individual risks;
- understand how they can enable continuous improvement of risk management response;
- understand that risk management and risk awareness are a key part of our culture;
- report systematically and promptly to senior management any perceived new risks or failures of existing control measures.

## Role of the Local Governing Board (LGB)

The role of the LGB in the management of risk is to:

- set the tone and influence the culture of risk management within the academy;
- determine whether the academy is 'risk taking' or 'risk averse' as a whole or on any relevant individual issue;
- determine what types of risk are acceptable and which are not by liaising with the DCEO and Risk Management Group;
- set the standards and expectations of staff with respect to conduct and probity;
- ensure the Trust's Risk Register is implemented and reviewed termly and return the updated Risk Register to the Deputy CEO/COO in advance of the Directors Audit Committee termly meeting;
- monitor and manage risks identified on the action plan automatically developed from further controls identified in the Risk Register;
- monitor the management of significant risks to reduce the likelihood of unwelcome surprises or impact and document any actions taken;
- satisfy itself that the less significant risks are being actively managed, with the appropriate controls in place and working effectively;
- annually review the academy's approach to risk management and approve changes or improvements to key elements of its processes and procedures.

## Role of the Audit and Risk Committee

Exceed Learning Partnership has designated the Audit Committee as the Risk Management Group.

Key roles of the Risk Management Group are to:

- take overall responsibility for the administration and implementation of the Risk Management Process;
- identify and evaluate the significant risks faced by the academies in the Trust for consideration by the Directors;
- approve major decisions affecting the Trust's risk profile or exposure.
- provide adequate information in a timely manner to the LGB and its committees on the status of risks and controls;
- ensure that all academies in the Trust adopt the schemes of delegation and apply these;
- report on Risk Management Action Plan implementation at each meeting of the Directors. Undertake an annual review of effectiveness of the system of internal control and provide a report to the Directors and LGB.

## Risk Management as Part of the System of Internal Control

The system of internal control incorporates risk management. This system encompasses a number of elements that together facilitate an effective and efficient operation, enabling the Trust to respond to a variety of operational, financial, and commercial risks. These elements include:

*a) Policies and Procedures*

Attached to significant risks are a series of policies that underpin the internal control process.

The policies are set by the Directors and implemented and communicated by the Executive Leadership Team to staff. Written procedures support the policies where appropriate.

*b) Monthly Reporting*

Comprehensive monthly reporting is designed to monitor key risks and their controls. Decisions to rectify problems are made at termly meetings of the Directors and the LGB if appropriate.

*c) Business Planning and Budgeting*

The business planning and budgeting process is used to set objectives, agree action plans, and allocate resources. Progress towards meeting business plan objectives is monitored termly.

*d) High Level Risk Action Plan (significant risks only)*

The risk management action plan is compiled by the Risk Management Group and helps to facilitate the identification, assessment and ongoing monitoring of risks significant to the Trust. The document is formally appraised annually but emerging risks are added as required, and improvement actions and risk indicators are monitored termly, (overseen by Deputy CEO/COO and the RMG)

*e) Individual Academy Risk Plans*

Significant risks within an Academy are identified via the Academy self-assessment process in the Local Governing Board/Risk Management Group meetings. Required actions identified are added to the risk register which automatically creates an action plan to be followed and reviewed termly to ensure the controls have been implemented to mitigate risk further. The Risk Register is shared with the Deputy CEO/COO who analyses the register and feeds back to the Principal/Business Manager if there are any concerns which need to be addressed. The register and action plan are then agreed by the LGB and RMG.

*f) Finance Committee (Audit)*

The Audit Committee in their report to the LGB on internal controls alerts governors to any emerging issues. In addition, the Audit committee oversees internal audit, external audit and management as required in its review of internal controls. The committee is therefore well placed to provide advice to the Directors and LGB on the effectiveness of the internal control system, including the Trust's system for the management of risk.

*g) Internal Audit Programme*

Internal audit is an important element of the internal control process. Apart from its normal programme of work, internal audit is responsible for aspects of the annual review of the effectiveness of the internal control system within the organisation.

*h) External Audit*

External audit provides feedback to The Audit Committee on the operation of the internal financial controls reviewed as part of the annual audit.

*i) Third Party Reports*

From time to time, the use of external consultants will be necessary in areas such as health and safety, and the implementation of the Disability Discrimination Act. The use of specialist third parties for consulting and reporting can increase the reliability of the internal control system.

## Annual Review of Effectiveness

The Directors are responsible for reviewing the effectiveness of internal control of the Trust, based on information provided by the Risk Management Group and LGBs. Its approach is outlined below.

For each significant risk identified, the Directors will:

- Review the previous year and examine the Trust's track record on risk management and internal control
- Consider the internal and external risk profile of the coming year and consider if current internal control arrangements are likely to be effective.

In making its decision the Directors will consider the following aspects:

**a) Control environment:**

- The Trust's objectives and its financial and non-financial targets;
- Organisational structure and calibre of the Executive Leadership Team;
- Culture, approach, and resources with respect to the management of risk;
- Delegation of authority; and public reporting.

**b) On-going identification and evaluation of significant risks:**

- Timely identification and assessment of significant risks; and prioritisation of risks and the allocation of resources to address areas of high exposure.

**c) Information and communication**

- Quality and timeliness of information on significant risks from LGBs; and time it takes for control breakdowns to be recognised or new risk to be identified.

**d) Monitoring and corrective action:**

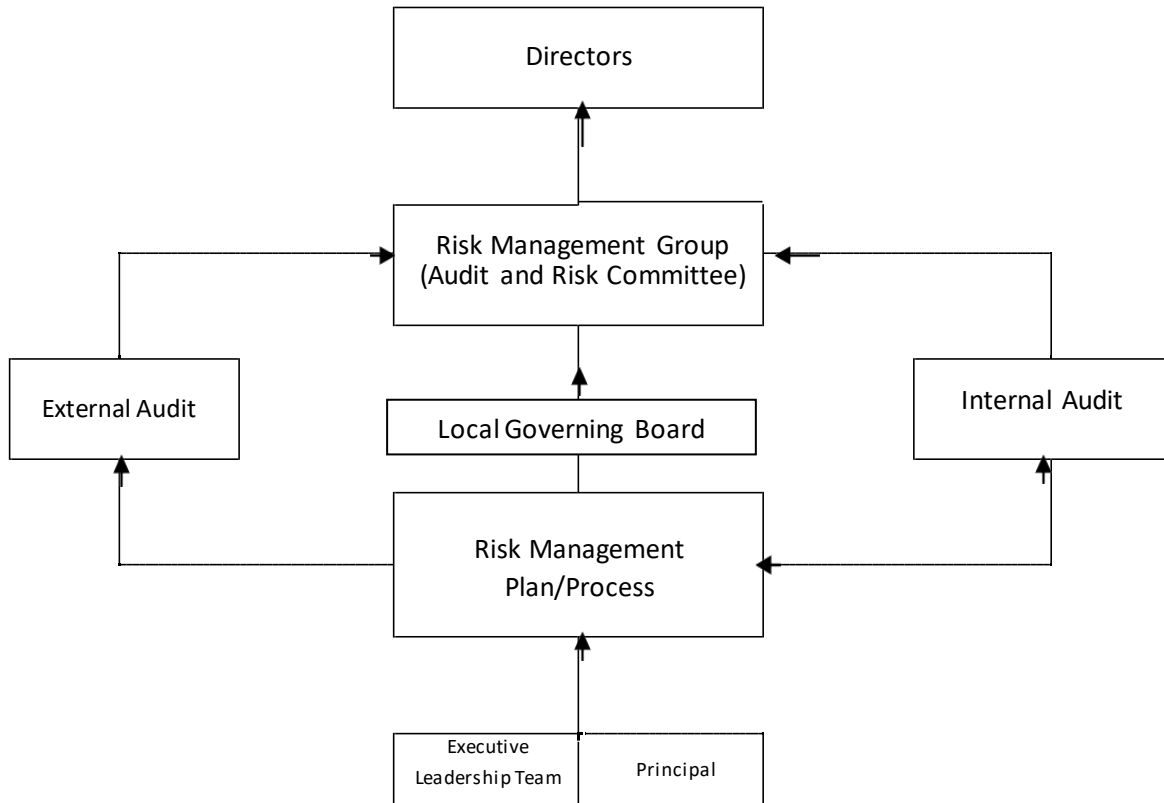
- Ability of the Individual Academy to learn from its problems and its commitment and responsiveness with which corrective actions taken are implemented.

The Risk Management Group will prepare a report of its review of the effectiveness of the internal control system annually for consideration by the Directors. This report is likely to be presented at the final board meeting of the academic year.



## Risk Management Structures, Roles and Ownership

A summary of the roles and responsibilities of each Board are set out below:



Board	Expected Role in Risk Management	Formal Responsibilities
The Directors	<p><b>The Directors are expected to:</b></p> <ul style="list-style-type: none"> <li>Set the tone and influence the culture of risk management throughout the Trust;</li> <li>Approve all major decisions affecting the Trust's risk profile or exposure;</li> <li>Frequently monitor the management of significant risks to reduce the likelihood of unwelcome surprises;</li> <li>Satisfy itself that the less significant risks are being actively managed, with the appropriate controls in place and working effectively; and</li> <li>Annually review the Trust's approach to risk management and approve changes or improvements to key elements of its processes and procedures. This should include an examination of the framework/process and its rigor.</li> </ul>	<p>The Directors are ultimately responsible for the Trust's system of internal control and reviewing its effectiveness.</p> <p>The Directors need to form an opinion on whether an individual academy has complied with all the provisions of the Combined Code throughout the year. This will include:</p> <ul style="list-style-type: none"> <li>Reviewing the key risks together with the controls which have been implemented to mitigate those risks; and</li> <li>Confirming whether or not there has been a formal ongoing process for identifying, evaluating and managing the Trust's significant risks that has been in place for the 12 months to 31 July each year and up to the account's approval date;</li> </ul> <p>The Directors will also need to ensure that there is a termly review of the Risk Management Process and its outcomes. The COO should ensure an up-date of the risk Management action plan goes to every Directors meeting throughout the year.</p>

Board	Expected role in risk management	Formal responsibilities
<b>Audit Committee</b>	The Audit Committee oversees internal audit, external audit, Information Security Regulation (ISR) auditors and management as required in its review of internal controls. The Committee is therefore well placed to provide advice to the Directors on the effectiveness of the Internal Control system, including the Trust's System for the management of risk as part of its Annual Report.	The Audit Committee reports to the Directors on internal controls and alerts Directors to any emerging issues. The Audit Committee meets on at least a termly basis and provides a forum for reporting by the Trust's internal and external auditors, who have access to the Committee for independent discussion.
<b>Risk Management Group (Audit and Risk Committee)</b>	<p>The Risk Management Group is comprised of all members of Executive Leadership Team. Its main function is to:</p> <ul style="list-style-type: none"> <li>• Implement policies on risk management an internal control;</li> <li>• Identify and evaluate the significant risks faced by the Trust for consideration by the Directors and Local Governing Boards;</li> <li>• Provide adequate information in a timely manner to the Directors and LGBs on the status of risks and controls;</li> <li>• Undertake an annual review of effectiveness of the system of internal control and provide a report to the Directors;</li> <li>• To prepare a new risk management action plan for each new academic year;</li> <li>• Provide advice and support to colleagues within the Trust and to Local Governing Board as appropriate;</li> <li>• Provide impetus and drive to the Risk Management Process to ensure the implementation timetable is achieved.</li> </ul>	<p>It's responsibility is to support the Directors and Local Governing Boards in discharging their duties.</p> <p>It should hold termly meetings to ensure action plan implementation is being carried out efficiently and effectively.</p> <p>Rolling programme of internal staff development (<i>all levels</i>)</p>
<b>Local Governing Board</b>	<p>Take overall responsibility for the administration and implementation of the Risk Management Process.</p> <p>Ensure risk management and its processes are disseminated and become embedded throughout the Academy.</p> <p>Hold termly meetings and evaluate the risks within the academy.</p> <p>Provide feedback to the RMG and ensure that the LGB is holding the Principal and Senior Leaders to account for risks within the Trust.</p> <p>Develop an action plan for the academy which identifies risk factors in accordance with the policy.</p>	The LGB to implement all policies outlined by the Trust and fully account risks.

<p><b>Internal Audit</b></p>	<p>Internal audit is an important element of the internal control process. Apart from its normal programme of work, internal audit is responsible for aspects of the annual review of the effectiveness of the internal control system within the organisation.</p> <p>Internal audit will need to take account of the corporate risks and the resultant risk management action plan in determining its strategic and annual plan of work.</p> <p>Internal audit should review and test the systems of control over the Risk Management Process to provide assurance to the Audit Committee that the process is well controlled and to confirm that the Risk Management Processes are being carried out in accordance with the agreed procedures and in a timely manner. There should be an annual review included within the internal audit strategic plan.</p>	<p>The Academy's internal auditors monitor the systems of internal control in accordance with an agreed plan of input and report their findings to the LGBs and Risk Management Group. Management are responsible for the implementation of agreed recommendations and internal audit undertake periodic follow up reviews to ensure such recommendations have been implemented.</p> <p>At least annually, Internal Audit provides the Local Governing Board/Directors, with a report on internal audit activity in the Trust. The report includes an independent opinion on the adequacy and effectiveness of the Trust's system of internal control, including internal financial control.</p>
<p><b>External Audit</b></p>	<p>External audit will ensure that the annual Risk Management Process has been undertaken, and that statements of Corporate Governance reflect the Trust's implementation of the combined code.</p> <p>It is <b>not</b> the role of external auditors to ascertain the robustness or accuracy of the risks identified or the internal controls over their operation. The auditors do not form an opinion on the effectiveness of the Trust's Corporate Governance procedures or its risk and control procedures.</p>	<p>External auditors express an independent opinion on whether the financial statements give a true and fair view, monies expended out of funds have been properly applied for those purposes and, if appropriate, managed in compliance with relevant legislation, and monies expended out of funds provided by the Education Funding Agency.</p> <p>The external audit opinion will also clearly set out the scope of their responsibilities and work in respect of confirming compliance with the Academies Financial Handbook.</p>

### Risk Identification

The process of risk identification is best done as a joint effort with the focus on things that could adversely affect business objectives. The process will involve Directors, Executive Leadership Team and Local Governing Board. Consideration will be given to the following factors:

- The vision, beliefs, values and strategic goals;
- The nature and scale of the individual academy activities, both current and planned;
- External factors that may affect the academy such as legislation and regulation
- The reputation of the academy with its key stakeholders;
- The operating structure, e.g. functions and issues that the academy may face due to transition to Academy status.

**See Appendix 1– Typical Categories of Risk**

### Risk Assessment

- Discuss and agree that all involved are satisfied with the list of risks;
- Determine the appropriate response to each risk;
- Assess existing controls and determine appropriate action;
- Allocate responsibility for action; and
- Agree future reporting and review procedures.
- Taking each of the risks in turn, discuss and rate them in terms of likelihood e.g. 1 = Low, 2=Medium chance of occurring and impact, e.g. 1= Negligible to 3=Catastrophic.

### Risk Matrix

The assessment of each risk will take into consideration the control measures currently in place to manage the risk. The controls identified will be assessed to determine whether they are an appropriate mitigation of the risks identified. The value for money of the chosen responses needs to be considered, i.e. it is as important to avoid over-control of minor risks as under- control of serious risks.

With this exercise complete, the Directors alongside the LGBs will decide what their risk appetite is, (what level of risk they are willing to tolerate using the Risk Management Strategy (page 5). This will determine what response the Directors / LGBs wishes to make to each risk.

**See Appendix 2 for Risk Matrix and Risk Responses**

### Action Planning/Risk Register

Any risks requiring treatment should be recorded in a risk register, areas to be considered as risk have been identified in Appendix 3. The actions required to produce an acceptable control system must be identified and documented. It should be clear who the actions have been allocated to along with a deadline for the action to be completed and a scheduled date for review.

A final version of the register will be considered at the Audit Committee meetings, a report identifying key risk will be produced and circulated to all Directors so that they are aware of the risk management and the controls in place to limit exposure to the risk.

### Monitoring and Review

The Risk Register will be monitored by the Chief Operations Officer with any known risks not already identified on the academies risk register being brought to the attention of the Principal and Business Manager. A final version of the Risk Register will be reviewed termly by Directors, Risk Management Group and LGBs to ensure that risks are identified and that appropriate controls and responses are in place and to ensure that:



- New risks/escalating risks are identified
- Planned actions are carried out in line agreed timescales
- Updating of the risk register as risks occur/change over time
- Early signs of developing risks are identified as early as possible

The Risk Management Group (Trust Audit & Risk Committee) will consider the Risk Management Policy, Risk Register and the Risk Management Action Plan on an annual basis. They will prepare a report for the consideration of the Governing Board which:

- Identifies and evaluates the significant risks faced by the Academy
- Makes recommendations concerning the content of the policy, action plan and register

The Directors will consider their report and approve any changes to the policy, the action plan and the register in the final meeting of the year.

LGBs will review the Risk Management Action Plan and the Risk Register at the final meeting of each term. They will:

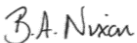
- Review the progress of the implementation of the Risk Management Action Plan
- Consider all risks, their status and their controls to ensure that they are still appropriate.
- Where a weakness is identified agree clear actions, timescales and responsibilities.
- Update the action plan and the register as required.

Following this meeting a report of the review will be presented to the next meeting of the Directors. Governors will consider the report and its recommendations and approve any subsequent actions.


#### References

EFA Financial Handbook 2021

Charity Commission Guidance on Charities and Risk Management (CC26) June 2010

Policy Agreed: 

Signed CEO: March 2024

Signed: Chair of Directors: 

Policy to be reviewed in Autumn 2024

## Appendix 1 - Typical Risks in a Multi Academy Trust

### Corporate/Strategic

- Lack of strategic planning, no link to financial planning
- Reputation

### Governance

- Responsibilities not defined
- Too much/little delegated to CEO and Chief Operations Officer
- Unable to attract Directors
- Non-attendance at meetings by Directors

### Academic

- Unable to achieve targets
- Staff recruitment and retention

### Pupil Support

- Welfare of pupils
- Safety of pupils

### Contractual/partnership

- Over-dependency on a relationship, liabilities arising

### Financial

- Changes in funding
- Changes in pupil numbers
- Internal control breakdown/Fraud
- Inaccurate financial reporting

### ICT

- Security risks
- Business continuity
- Obsolescence of current systems

### Physical

- Legislation- DDA, fire safety etc.
- Loss, damage or theft of assets

### Commercial

- VAT/taxation exposure

### Political

- Failure to maximise opportunities

### Legal

- Child Protection
- Admissions
- Employment Legislation,
- Data Protection, FOI etc.
- Contracts etc.
-

## Appendix 2 - Risk Management Procedure and Matrix

### Guidance on the Definition of Likelihood and Impact

Impact		
Risk Score	Percentage Chance of Risk Occurring	Definition
1	Low	The financial impact is likely to be low [below £5,000 and £24,000] Has a low impact on strategy or on teaching and learning Low stakeholder concern Is unlikely to cause any reputational damage to the school
2	Medium	The financial impact will be moderate [between £25,000 and £49,000] Has no more than a moderate impact on strategy or on teaching and learning Moderate stakeholder concern Can cause moderate reputational damage to the school
3	High	The financial impact will be significant [in excess of £50,000] Has a significant impact on the school's strategy or on teaching and learning Has significant stakeholder concern Can cause significant reputational damage to the school

Likelihood		
1	Low	Not likely to occur within a 4 year time period or less than 5% chance of occurrence
2	Medium	Likely to occur within a 4 year time period or less than 25% chance of occurring within the next 12 months
3	High	Likely to occur each year, or more than 25% chance of occurrence within the next 12 months

Risk Matrix				
LIKELIHOOD	<b>3 - High</b> <ul style="list-style-type: none"> <li>Likely to occur yearly</li> <li>&gt; 25% chance of occurring within next 12 months</li> </ul>	3	6	9
	<b>2 - Medium</b> <ul style="list-style-type: none"> <li>Likely to occur within 4 years</li> <li>&lt; 25% chance of occurring within next 12 months</li> </ul>	2	4	6
	<b>1 - Low</b> <ul style="list-style-type: none"> <li>Unlikely to occur within 4 years</li> <li>&lt; 5% chance of occurring within next 12 months</li> </ul>	1	2	3
		1 - <b>Very Low</b> (Insignificant)	2 - <b>Low</b>	3 - <b>Medium</b>
IMPACT				

Risk Rating (severity)		
1 ≥ 2	3 ≥ 4	6 ≥ 9

Risk Responses (Risk Appetite)		
Risk Rating	Risk Response	Description
1-2	Monitor and Minimise	Low or Relatively Insignificant Risk
3-4	Mitigate and Control	Medium risk that requires active Risk Controls
6-9	Remove and Restrict	Aggressive Controls and Restrictions

## Appendix 3 – Strategic Risks

A spreadsheet will be created for each academy to evaluate risk – see example below. This will then form a high-risk action plan to the Board of Directors to Assess Risk.

### STRATEGIC RISKS – ACHIEVING STRATEGIC AIMS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Academy development/improvement plan (ADP)	Y	L	L	L
2	Aims of ADP are being achieved	Y	L	L	L
3	School-wide understanding of ADP aims and objectives	Y	L	L	L
4	Governors involved in preparing ADP	Y	L	L	L
5	Ofsted preparation, including preparation and updating the self-evaluation form (SEF)	Y	L	L	L
6	Ofsted action plan	Y	L	L	L
7	Ofsted action plan aims being achieved	Y	L	L	L
8	Staff/governors involved in setting school performance targets	Y	L	L	L
9	Performance targets being achieved	Y	L	L	L
10	Staff/governors involved in producing value added measures	Y	L	L	L
11	Value added measures being employed	Y	L	L	L
12	Profile/prospectus conforms to national requirements	Y	L	L	L
13	Profile/prospectus in place or in preparation for coming year	Y	L	L	L
14	Budget strategy agreed with governors	Y	L	L	L
15	Budget monitoring in place	Y	L	L	L
16.	Recruitment of sufficient number of pupils.	Y	L	L	L

## STRATEGIC RISKS – MANAGEMENT STRUCTURES

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Roles, responsibilities and governor expectations of Principals defined	Y	L	L	L
2	Roles, responsibilities and Principals expectations of Deputy Principals defined	Y	L	L	L
3	Roles, responsibilities and leadership expectations of senior managers defined	Y	L	L	L
4	Roles, responsibilities and team leader expectations of teachers defined	Y	L	L	L
5	Roles, responsibilities and teacher/team leader expectations of support staff defined	Y	L	L	L
6	Roles, responsibilities and expectations of governors defined	Y	L	L	L
7	Governing Board structures defined	Y	L	L	L
8	Governing Board sub-committees' structures set up as required	Y	L	L	L
9	Induction programme for all staff	Y	L	L	L
10	Induction programme for governors	Y	L	L	L
11	Staff handbook available	Y	L	L	L
12	Administrative support for staff in place	Y	L	L	L
13	Processes for completing required returns to DFE, Education Funding Agency (EFA) and others in place	Y	L	L	L
14	Process for reporting to parents annually in place	N/A			
15	Plan for parents' consultations	Y	L	L	L

16	Time plan in place for teaching staff (1,265 hours)	Y	L	L	L
17	School day structure agreed with parents, governors and staff	Y	L	L	L
18	Pastoral support structure in place	Y	L	L	L
19	Salary policy in place	Y	L	L	L
20	Performance management policy in place for teaching staff	Y	L	L	L
21	Performance management policy in place for support staff	Y	L	L	L

## PROFESSIONAL RISKS – EDUCATIONAL OBJECTIVES

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Correct syllabuses in use	Y	L	L	L
2	Schemes of work and lesson plans used	Y	L	L	L
3	Assessment of pupils who may have learning difficulties	Y	L	L	L
4	Recognition of able gifted and talented pupils	Y	L	L	L
5	PSHE and citizenship education	Y	L	L	L
6	RE being taught	Y	L	L	L
7	Daily act of collective worship	Y	L	L	L
8	Careers education and guidance policy	N/A			
9	Work experience policy	N/A			
10	Policy on needs of young carers	N	L	L	L
11	Policy for looked after children	Y	L	L	L
12	Policy for drugs education	N	L	L	L
13	Provision for ethnic minorities, travellers and refugees	Y	L	L	L
14	Marking policy	Y	L	L	L
15	Reporting policy	N	L	L	L
16	Assessment policy	Y	L	L	L
17	Individual education plan policy	N	L	L	L

## PROFESSIONAL RISKS – CONDUCT

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Monitoring of pupil punctuality	Y	L	L	L
2	Monitoring of pupil attendance	Y	L	L	L
3	Sanctions policy for lack of punctuality	N	L	L	L
4	Truancy policy	Y	L	L	L
5	Liaison with police and other agencies	Y	L	L	L
6	Policy on uniform/dress code/hairstyles/jewellery	N	L	L	L
7	Detention policy	N	L	L	L
8	Behaviour support plans	Y	L	L	L
9	Home-school agreement	Y	L	L	L
10	Policy on restraining pupils	Y	L	L	L
11	Misuse of substances policy	N	L	L	L
12	Pupil exclusion procedure	Y	L	L	L
13	Exclusion appeals procedure	Y	L	L	L
14	Monitoring staff punctuality	N	H	H	H
15	Monitoring staff absence	Y	L	L	L
16	Alcohol and drug abuse policy for staff	N	L	L	L
17	Disciplinary procedures for staff	Y	L	L	L
18	Staff grievance procedure adopted	Y	L	L	L



## PROFESSIONAL RISKS – LIABILITIES BEYOND THE CLASSROOM

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Supervision of pupils before and after school sessions	Y	L	L	L
2	Supervision at break times	Y	L	L	L
3	Supervision at lunchtime	Y	L	L	L
4	Safety in the playground	Y	L	L	L
5	Safety in the playing fields	N/A			
6	Policy on supervision of outdoor education	N	H	H	H
7	Policy on supervision of off-site activities	N	H	H	H
8	Policy on school trips, insurance cover, overseas travel	Y	L	L	L
9	Equality of access to, and supervision during, out of school hours activities	Y	L	L	L

## PROFESSIONAL RISKS – STAFF AND PUPIL PROCEDURES

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Provision of adequate staffing level	Y	L	L	L
2	Procedures for staff recruitment and selection (including safeguarding of children)	Y	L	L	L
3	Ensuring appropriate staff and governors have fulfilled safer recruitment training expectations	Y	L	L	L
4	Ensuring all interviewing panels have member who has undertaken safer recruitment training	Y	L	L	L
5	Procedures on employment rights including use of, and writing of, references	Y	L	L	L
6	Ensuring disclosure and barring service (DBS) and other recruitment checks are carried out on all employees	Y	L	L	L
7	Provision of Induction training	N	H	H	H
8	Provision of continuing professional development (CPD)	Y	L	L	L
10	Procedures for staff disciplining and dismissal	Y	L	L	L
11	Ensuring staff rights – sex discrimination, equal opportunities, race equality, disability discrimination, maternity	Y	L	L	L
12	Planning for redundancy, retirement	N	L	L	L
13	Provision of induction for pupils	Y	L	L	L
14	Ensuring pupils' rights on sex discrimination, equality of opportunity and race equality, disability	Y	L	L	L
15	Ensuring record of achievement is available	Y	L	L	L
16	Ensuring pupil information is passed on from one phase to the next	Y	L	L	L

## PHYSICAL RISKS – INJURY TO STAFF AND PUPILS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Health and safety policy adopted	Y	L	L	L
2	Health and safety assessments modified as appropriate	Y	L	L	L
3	Health and safety assessments disseminated across the school	Y	L	L	L
4	Training needs on health and safety identified	Y	L	L	L
5	First aid equipment available	Y	L	L	L
6	Trained up to date first aider available at all times	Y	L	L	L
7	Fire risk assessments carried out and shared with staff	Y	L	L	L
8	Workplace regulations in force	Y	L	L	L
9	Display screen regulations being followed	Y	L	L	L
10	Manual handling protocols	Y	L	L	L
11	Adherence to control of substances hazardous to health (COSHH) regulations	Y	L	L	L
12	Adherence to asbestos management	Y	L	L	L
13	Policies in place for use of machinery and electrical equipment	N/A			
14	Policy for use of higher risk areas e.g.	N/A			
	Technology rooms	N/A			
	Science laboratories	N/A			
	Gymnasium	N/A			
	Swimming pool	N/A			
15	Stress management policy in place	N	H	L	M
16	Smoking or Vaping policy	Y	L	L	L
17	Policy on violent behaviour	Y	L	L	L
18	Child protection procedures	Y	L	L	L
19	Policy on bullying	Y	L	L	L
20	Policy on head lice	N	L	L	L
21	Policy on use of mobile phones	Y	L	L	L

## PHYSICAL RISKS – PROPERTY

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Accessibility plan	N	H	L	M
2	Procedures to reduce theft	Y	L	L	L
3	Policy to minimise vandalism	N	H	L	M
4	Policy to minimise trespass	N	H	L	M
5	Measures undertaken to minimise risk of fire	Y	L	L	L
6	Measures undertaken to minimise risk of water damage	Y	L	L	L
7	Measures taken to minimise disruption from:				
	Machinery failure	N/A			
	Failure due to lack of maintenance of equipment	N/A			
	External sources e.g. workmen	Y	L	L	L
8	Policy on minibus usage and insurance implications	N/A			
9	Vehicle movements on school premises	Y	L	L	L
10	Awareness of potential for harm on home/school transport	N/A			

## FINANCIAL RISKS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Budget plan for next 1/2/3/4/5 years agreed by governors	Y	L	H	M
2	Setting of budgets agreed by governors	Y	L	L	L
3	Budget monitored monthly	Y	L	L	L
4	Budget reports sent to governors termly	Y	L	L	L
5	Roles and responsibilities with respect to finance allocated	Y	L	L	L
6	Income monitored	Y	L	L	L
7	Payroll expenditure monitored	Y	L	L	L
8	Expenditure controls monitored monthly	Y	L	L	L
9	Opportunities to maximise external funding monitored and taken up	Y	L	L	L
10	Cash security policy in place (e.g. school dinners and voluntary funds)	Y	L	L	L
11	Audit policy in place for voluntary funds	N/A			
12	Insurance provision in place for:				
	Employers' liability	Y	L	L	L
	Public liability	Y	L	L	L
	Balance of risks	N/A			
	Motor vehicles	N/A			
	Travel (including high risk activities)	Y	L	L	L
	Sickness absence	Y	L	L	L
	Maternity leave	Y	L	L	L
13	Charging policy	Y	L	L	L
14	Governors' allowances (scheme for paying)	N/A			

## LEGAL RISKS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Adhere to health and safety regulations	Y	L	L	L
2	Adhere to education law	Y	L	L	L
3	Adhere to employment law	Y	L	L	L
4	Adhere to Human Rights Act	Y	L	L	L
5	Adhere to Freedom of Information Publication Scheme	Y	L	L	L
6	Register and comply with Data Protection Act especially with regard to computer use	Y	L	L	L
7	Appropriate copyright licences in place (Copyright Licence, Performing Rights Society Licence, Public Video Screening Licence and any others as appropriate)	Y	L	L	L
8	Be aware of or know where to obtain advice as necessary on liability in connection with:				
	Occupiers Liability Act	Y	L	L	L
	Defective Premises Act	Y	L	L	L
	Environmental Protection Act	Y	L	L	L
	Building regulations	Y	L	L	L
	Failure to educate	Y	L	L	L
	Personal injury	Y	L	L	L
	Motor accident on business	Y	L	L	L
	Giving wrongful advice	Y	L	L	L
	Maladministration	Y	L	L	L
	Leaking of confidential information	Y	L	L	L
	Industrial tribunal claims	Y	L	L	L
	Disability rights claims	Y	L	L	L
9	Adhere to SORP requirements	Y	L	L	L
10	Adhere to VAT, PAYE and NI requirements	Y	L	L	L

## ENVIRONMENTAL RISKS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Efficient use of gas monitored	Y	L	L	L
2	Efficient use of electricity monitored	Y	L	L	L
3	Efficient use of water monitored	Y	L	L	L
4	Policy on building temperatures	N	L	L	L
5	Noise control measures – where relevant	N/A			
6	Policy on recycling of materials	N	L	L	L
7	Correct storage and disposal of waste materials	Y	L	L	L
8	Dealing with contamination of grounds or buildings – who to contact	Y	L	L	L

## CONTRACTUAL RISKS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Processes for selecting contractors	Y	L	L	L
2	Ensure contractors are on approved lists (if necessary)	N/A			
3	Establish financial stability of contractors	N	L	L	L
4	Establish indemnity of contractors	N	L	L	L
5	Ensure insurance position re contractors	Y	L	L	L
6	Ensure contractors satisfy construction design and management regulations (CDM) regulations	Y	L	L	L
7	Understand how to set specifications and avoid variations in contracts	Y	L	L	L
8	Identify contractual liability	Y	L	L	L



## TECHNOLOGICAL RISKS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Information and communication technology (ICT) strategy developed	Y	L	L	L
2	Contingency plan in place for computer failure	Y	L	L	L
3	Back up procedures in place and used	Y	L	L	L
4	Access controls documented	Y	L	L	L
5	Internet usage policy in place	Y	L	L	L
6	Procedures in place for dealing with unacceptable use of computer equipment	Y	L	L	L
7	Hardware security policy	N	L	L	L
8	Data security policy	N	H	L	M
9	Procedures in place for dealing with breaches of security policies	Y	L	L	L
10	Virus protection policy	N	H	L	M

## DISASTER RECOVERY RISKS

Ref no	Area of risk	In place (Y/N/n/a)	Impact if not in place (H or L)	Likelihood of creating a problem if not in place (H or L)	Priority for action plan (H or M or L)
1	Plans in place for loss of services/contents/computer records	Y	L	L	L
2	Plans in place for loss of buildings/heating/lighting/power/telephones	Y	L	L	L
3	Plans in place for school closures and evacuations	Y	L	L	L
4	Provision of secure storage after a disaster for recoverable items and data	Y	L	L	L
5	Contingency plan for loss of staff	N	H	L	M

## Appendix 4 – Example of Risk Management Action Plan

After the risk assessment has taken place and the priorities for action have been established the following tables can be used to create the risk management action plan.

### RISK MANAGEMENT ACTION PLAN – HIGH RISK – REMOVE AND RESTRICT - Example

Area of risk	Risk	Control measures	Lead officer	Target date for control implementation	Actual date for achieving target
Monitoring staff punctuality	Staff not turning up for work on time could have an effect on the supervision and teaching of children	All staff to sign in and out electronically	Deputy Principal		
Policy on supervision of outdoor education	Lack of consistency in supervision and the possibility of a court case in the event of an accident/incident	All staff to be aware of the risk assessment for any outdoor education event and to comply with the control measures	All		
Policy on supervision of off-site activities	Lack of consistency in supervision and the possibility of a court case in the event of an accident/incident	All staff to be aware of the risk assessment for any off-site activity and to comply with the control measures	All		
Provision of Induction training	New staff unsure of policies and procedures. May result in an accident/incident or fatality		Deputy Principal		

## RISK MANAGEMENT ACTION PLAN – MEDIUM RISK– MITIGATE AND CONTROL - Example

Area of risk	Risk	Control measures	Lead officer	Target date for control implementation	Actual date for achieving target
Stress management policy in place	Inconsistent support given to staff who may be subject to stress. Staff sickness levels escalate if consistent management not in place. Staff unable to perform duties		Principal		
Accessibility plan	Children unable to access the building and/or the curriculum. Parents unable to access information. Children with additional needs unable to access teaching and learning with their peers creating isolation and anxiety	Ensure all known needs are catered for when they are brought to attention	All		
Policy to minimise vandalism	Any possible risks not identified and reported in order for preventative measures to be put in place	Any known acts of vandalism acted upon	Principal		
Policy to minimise trespass	Any possible risks not identified and reported in order for preventative measures to be put in place	Any known acts of trespass acted upon	Principal		

Area of risk	Risk	Control measures	Lead officer	Target date for control implementation	Actual date for achieving target
Budget plan for next 1/2/3/4/5 years agreed by governors	Funding not in place for future development therefore unable to meet health and safety, condition or growth issues				
Data security policy	Sensitive information delivered to wrong hands leading to court case	Staff data managed and maintained by Business Manager. All admin staff aware of pupil data security  All staff to be aware of GDPR and how to report breaches	Principal		
Virus protection policy	School computer systems infected with viruses disabling machines. Unable to access data bases and pupil emergency contact information	Security software installed on server, PC's and laptops			
Contingency plan for loss of staff	Roles not filled in the event of a disaster resulting in children not being taught or supervised. Staff holding unique information unable to share in order to operate as a school		Principal		



**RISK MANAGEMENT ACTION PLAN – LOW RISK – MONITOR AND MINIMISE - Example**

Area of risk	Risk	Control measures	Lead officer	Target date for control implementation	Actual date for achieving target
Policy on needs of young carers	Young carers may not be identified and supported consistently	Identify known children and put support measures in place where needed	SENCo TA		
Policy for drugs education	No consistent message on drugs	Inform children through PSHE and DARE sessions	SENCo		
Reporting Policy	Inconsistent reporting to parents	All staff made aware of how to write reports for the current year	Principal		
Individual education plan policy	Inconsistency in identifying children and writing up of plans which may lead to confusion	Children in need of additional support identified and measures put in place	SENCo		
Sanctions policy for lack of punctuality	Inconsistency in dealing with late arrivals which may lead to mix messages and irate parents	SENCo TA to monitor late arrivals and put measures in place to support	SENCo TA		
Policy on uniform/dress code/hairstyle /jewellery	Mixed messages to parents' children/parents as to what is an acceptable code of dress	All parents and children made aware of the School uniform, etc. through induction events and on going	Principal		



Area of risk	Risk	Control measures	Lead officer	Target date for control implementation	Actual date for achieving target
Detention policy	Inconsistency in dealing with children on detention				
Misuses of substances policy	Staff unsure what to do if they suspect substance misuse	All staff to be vigilant and to report any suspicions to Principal to deal with immediately	All		
Alcohol and drug abuse policy for staff	Staff unsure what to do if they suspect substance misuse and inconsistency in dealing with any cases	All staff to be vigilant and to report any suspicions to Principal to deal with immediately	All		
Planning for redundancy, retirement	Positions left vacant and roles not filled resulting in essential tasks not being completed and deadlines not met. Funding not available to meet payments due.		Principal		
Smoking policy	Staff and members of the public unsure as to what is acceptable or not. Children and non-smokers subject to smoke inhalation which may lead to breathing disorders	No smoking signs displayed on the School premises	Principal		



Area of risk	Risk	Control measures	Lead officer	Target date for control implementation	Actual date for achieving target
Policy on head lice	Inconsistent messages to parents concerning children with head lice		Principal		
Insurance provision in place	Funding for long term sickness and maternity leave to come out of GAG funding	Team teaching ensures adequate cover available along with local supply staff	Business Manager		
Adhere to SORP requirements		The Trust manages the charitable status			
Policy on building temperatures	Children and staff working in conditions below the statutory guidelines	Awareness of minimum working temperature	Site Manager		
Policy on recycling of materials	Recycled waste is dispensed of with general waste causing landfill issues	ECO Ants have displayed posters around School reminding staff and children to recycle			
Establish financial stability of contractors	Contractors go into liquidation or receivership mid job	Pay contractors once job has been completed to satisfaction	Business Manager		





## Appendix 5 – School Improvement Risk Register (Headline Data Report)

The School Improvement Risk Register is completed by Principal's and the CEO/Director of Primary and final versions are approved by the CEO/Director of Primary. Once approved the academy specific report is presented to LGBs. A whole Trust Report is presented to the Standards and Education Committee for monitoring.

The report contains: Attainment Data, Summary of Attainment, Contextual Information and Heat Map, Annual Risk Assessment of Academy, Safeguarding Audit and Action Plan

### Attainment Data

Early Years Attainment % GLD			Phonics Attainment				Attendance		
National: 65%	Baseline	45%	Y1 (61)		Y2 (60)		% Att F2 - Y6		PA %
	Autumn	68%	Autumn	79%	78%	Autumn	94%	16%	
	Spring	77%	Spring	81%	92%	Spring	95%	11%	
	Summer	77%	Summer			Summer			
	Target	78%	Target	87%	87%				

Whole School Data												
	Year 1		Year 2		Year 3		Year 4		Year 5		Year 6	
	%AT	%GD	%AT	%GD	%AT	%GD	%AT	%GD	%AT	%GD	%AT	%GD
Reading	Prev. Sum.		66.67	16.67	78.33	31.67	78.27	37.29	78.27	40.68	76.67	36.67
	Autumn	78.69	27.87	68.33	26.67	75.41	31.15	68.33	35	81.67	46.67	81.67
	Spring	77	36	71	34	77	33	79	39	80	44	81
	Summer											
	Target	79	31	80	28	79	31	78	37	82	48	82
Writing	Prev. Sum.		56.67	8.33	66.67	18.33	69.49	22.03	71.19	15.25	60	8.33
	Autumn	65.57	18.03	70	18.33	68.65	16.39	65	23.33	75	18.33	53.33
	Spring	77	23	75	25	70	16	72	25	77	16	56
	Summer											
	Target	79	21	82	13	70	16	76	26	75	22	78
Maths	Prev. Sum.		78.33	21.67	75	31.67	76.27	35.59	76.27	35.59	76.67	43.33
	Autumn	81.97	31.15	71.67	33.33	75.41	36.07	68.33	35	73.33	40	70
	Spring	87	34	80	34	77	43	72	33	79	39	80
	Summer											
	Target	80	38	83	32	79	36	83	36	78	42	85
Combined	Prev. Sum.		56.67	6.67	65	13.33	67.8	22.03	66.1	13.56	60	6.67
	Autumn	65.57	14.75	63.33	16.67	65.57	14.75	61.67	23.33	68.33	16.67	51.67
	Spring	75	21	71	22	67	16	68	23	69	15	56
	Summer											
	Target	74	20	78	13	67	15	76	25	73	20	78

KEY CODE:	Range AT	Range GD
Green	> 2%	>2%
Yellow	+ / - 2%	+/- 2%
Orange	< 2%	<2%
Red	<20%	<10%

2022 KS1 National Average levels:		
	%AT	%GD
Reading	65	18
Writing	58	8
Maths	68	15
Phonics	76% in Y1	87% in Y2

2022 KS2 National Average levels:		
	%AT	%GD
Reading	74	27
Writing	69	13
Maths	71	22
Combined	59	7

### End of Year Targets

End Of Year Targets												
EYFS		Year 1		Year 2 (cummulative)		Year 4		Year 5		Year 6		
ELG	78%	Phonics	87%	Phonics	87%	Tables	Test					
	Year 1		Year 2		Year 3		Year 4		Year 5		Year 6	
	AT	GD	AT	GD	AT	GD	AT	GD	AT	GD	AT	GD
Reading	79	31	80	28	79	31	78	37	82	48	82	38
writing	79	21	82	13	70	16	76	26	75	22	78	15
Maths	80	38	83	32	79	36	83	36	78	42	85	42
Combined	74	20	78	13	67	15	76	25	73	20	78	13

End of year targets, that have been set in the Autumn term, are highlighted green if they are still deemed achievable. The target is highlighted red if they need to be amended. Where the cell has been highlighted red, an adjusted target has been set in brackets underneath.



**Summary**

- Principal Comments
- CEO/Director of Primary Comments

**Contextual Information and Heatmap**

Contextual Information						
Headcount		Language		SEN		
F1	35	English	354			
F2	60	Lithuanian	0	Support plans & IEPs	51	11%
Year 1	61	Polish	31	EHCPS	8	2%
Year 2	60	Turkish	4	Total	59	13%
Year 3	61	Slovak	0			
Year 4	60	Other	70			
Funding						
Year 5	62				Number	%
Year 6	60			Pupil Premium	49	11%
Total	459					

Heat Map													
Area	Culture and Climate	Leadership, Vision, planning and capacity	Curriculum Provision	Quality of Teaching	Outcomes for Pupils	Outcomes for Disadvantage Pupils	Depth of Learning	SEND Provision and Intervention Strategies	Behaviour, Attendance and Personal Development	Safeguarding	Deployment of Resources	Impact of Governance	EYFS
Academy	Green	Green	Green	Green	Blue	Blue	Blue	Green	Blue	Green	Green	Green	Green
	Inadequate Developing/Improving	Developing/Improving	Strong Practice	Exemplary Practice									
Ofsted Criteria	4	3	2	1									
Risk Register	Critical Risk	Significant Risk	Moderate Risk	Low Risk									
	4	3	2	1									

**Safeguarding Audit Actions**

	Question	Action
1.2	Keeping children safe in education 2022: all staff - Part 1 & Annex A & Annex B senior leaders - full document governors - full document designated safeguarding lead - full document recruitment panel - Part 3	Not all LGB have attended training offered by Trust. Governors to attend online training on 16/01/2023 at 6:00pm



## Appendix 6 Education Risk Descriptors

Risk		Critical Risk	Significant Risk	Moderate Risk	Low Risk
Probability		4,5	3,4	2,3	1,2
Impact		4,5	3,4	2,3	1,2
<b>Ofsted</b>		Ofsted Category Inadequate. Ofsted category of RI, Good or Outstanding; Trust evaluation evidences that the school will be judged as inadequate without high level intervention.	For schools with Ofsted category of Good or better Trust evaluation evidences that the school is vulnerable of an Inadequate/RI Ofsted judgement at its next inspection.	Ofsted Category Requires Improvement. Evaluation evidences improvement towards the school being judged Good at its next inspection. Ofsted Category Good. Evaluation evidences Further improvements to be made to consolidate this position.	Ofsted Category Good. Trust evaluation evidences that leaders have consolidated this position.
	<b>Quality of Education</b>				
	<b>Curriculum</b>	School leaders fail to address any inadequacies in the curriculum and as a result it fails to meet the needs of all learners including those that are disadvantaged and with SEND.	The curriculum is not sufficiently developed to meet the needs of all learners. School leaders are beginning to address inadequacies in the curriculum.	Capacity is being built in the curriculum and the intent and implementation are clear and address the needs of all groups of pupils in all subjects. Some aspects of the curriculum are currently under review	A wider curriculum is well developed and implemented throughout school. It engages all pupils including those that are disadvantaged and with SEND. However some minor aspects of the curriculum impact may be under review.
	<b>Attainment</b>				
	<b>KS2</b>	From pupils' starting points, attainment remains low	From pupils' starting points there is a lack of sustained improvement	Over time attainment has been at least in line with national average; however, in the present year there is an unusual dip in performance.	Attainment in all areas is at or above national data.
	<b>KS1</b>	From pupils' starting points, attainment remains low and there is a lack of sustained improvement	From pupils' starting points, there are some concerns regarding attainment.	There are some concerns regarding attainment, however this is not overtime.	Pupils consistently attain well including disadvantaged and pupils with SEND
	<b>Phonics</b>	Outcomes at Y1 and Y2 remain low and there is a lack of sustained improvement	Outcomes at Y1 and Y2 remain low and there are signs of improvement	There are some concerns regarding outcomes, however this is not overtime.	Phonics outcomes are in line with national results including disadvantaged and pupils with SEND
	<b>EYFS</b>	GLD - From children's starting points outcomes remain low and there is a lack of sustained improvement	From children's starting points GLD remains low but is improving.	There are some concerns regarding GLD but this is not overtime.	GLD is in line national results including disadvantaged and pupils with SEND
	<b>Progress</b>	Progress, including for disadvantaged / SEND, is below or well below average overtime in all key stages.	There are some concerns in relation to progress measures at: a)EYFS b) Phonics c) KS1 d) KS2	Progress measures are at least average. At KS2, if any progress measure is negative this is less than 1 point below zero.	All progress measures are at least average with some being above.
	<b>Teaching &amp; Learning</b>	Pupils experiences in most lessons contribute weakly to their learning of the intended curriculum.	Pupils experiences in some lessons contribute weakly to their learning of the intended curriculum.	Most teachers have a firm and common understanding of the school's curriculum intent and what it means for their practice. Pupils experiences in the majority of lessons result in pupils developing detailed knowledge and skills across the curriculum and as a result they achieve well. Where this is not the case there is a plan in place and teaching is improving.	Teachers have a firm and common understanding of the school's curriculum intent and what it means for their practice. Pupils experiences in lessons result in pupils developing detailed knowledge and skills across the curriculum and as a result they achieve well.
	<b>Remote Learning</b>	Pupils experiences in lessons contribute weakly to their learning of the intended curriculum.			



<b>EYFS</b>		The curriculum and learning environment do not provide a broad range of experiences.	The curriculum provides a limited range of learning experiences that do not always meet the children's needs and therefore progress is limited.	The curriculum provides a broad range of interesting experiences that meets children's needs and help them to make satisfactory progress.	The curriculum provides a broad range of interesting and demanding experiences that meets children's needs and help them to make good progress.
		Statutory EYFS welfare requirements are not met.	Statutory EYFS welfare requirements are met.	Statutory EYFS welfare requirements are met.	Statutory EYFS welfare requirements are fully met.
		Engagement of parents is weak impacting on a child's development.	Parents and carers received limited information regarding their child's learning and there is insufficient advice and support provided.	Parents and carers are informed of their child's progress and given some advice to support to learning at home.	Parents and carers contribute to initial assessments and are well informed of their children's progress and encouraged to support learning at home.
<b>Behaviour and Attitudes</b>	<b>Attendance</b>	Attendance is consistently low for all pupils without sign of improvement.	Attendance is consistently low with signs of improvement.	Attendance whilst currently low measurable improvement is being made.	Pupils attendance is high. Where this is not the case the school takes swift and appropriate action.
	<b>Behaviour and attitudes</b>	Staff and / or pupils' behaviour and/or learning behaviour critically impacts negatively upon teaching, learning and pupil outcomes and/or well-being.	Staff and / or pupils' behaviour and / or learning behaviour impacts negatively upon teaching, learning and pupil outcomes and/or well-being for some year groups.	Staff and / or pupils' behaviour and/or learning behaviour impacts positively upon teaching, learning and pupil outcomes and/or well-being. However, appropriate interventions for a small number of pupils needs further development.	Staff and / or pupils' behaviour and effective learning behaviour impacts positively on teaching, learning, pupil outcomes and well-being.
<b>Personal Development</b>		A significant minority of pupils do not receive a wide and rich set of experiences and as a result do not have the opportunity to develop positive; citizenship, British Values, understanding of difference, personal traits mental health, ability to keep safe on-line and in the community, physically healthy lifestyle, understanding of a healthy relationships (RSE), SMSC Pupils do not have equality of opportunity and/or are not protected from radicalisation and/or extremist views. Where there is discrimination the school does not take effective action Pupils are unprepared for life in modern Britain.	A minority of pupils do not receive a wide and rich set of experiences and as a result do not have the opportunity to develop positive; citizenship, British Values, understanding of difference, personal traits mental health, ability to keep safe on-line and in the community, physically healthy lifestyle, understanding of a healthy relationships (RSE), SMSC Pupils do not have equality of opportunity and/or are not protected from radicalisation and/or extremist views. Where there is discrimination the school does not take effective action Pupils are unprepared for life in modern Britain.	School plans are in place however have not yet been fully implemented as a result pupils do not consistently receive a wide and rich set of experiences. Pupils have the opportunity to develop positive; citizenship, British Values, understanding of difference, personal traits mental health, ability to keep safe on-line and in the community, physically healthy lifestyle, understanding of a healthy relationships (RSE), SMSC Pupils have equality of opportunity and are protected from radicalisation and extremist views. Where there is discrimination the school takes effective action Pupils are prepared for life in modern Britain.	The school curriculum extends beyond the academic Pupils know how to stay physically and mentally healthy Pupils have an age appropriate understanding of healthy relationships. Pupils have opportunities to develop their interests and talents Pupils are prepared for life in modern Britain Pupils understand and respect differences and commonalities in the world and its people Pupils engage with beliefs that are different from their own. No forms of discrimination are tolerated Pupils have opportunity to be active and respectful citizens.



<b>Leadership</b>		Leaders including governors, are not doing enough to tackle weaknesses in school.	School leaders progress in addressing inadequacies is not rapid enough.	Developing evidence can be seen of school leaders addressing key inadequacies	The leadership is independently addressing any wider inadequacies.
		Leadership capacity to address any inadequacies in the quality of education, personal development, behaviour and attitudes is poor. As a result, leaders are not aware of, or taking, effective action to stem the decline in the attainment or progress of pupils, especially those disadvantaged.	School leaders are beginning to address inadequacies in the quality of education, personal development, behaviour and attitudes. This is not sufficiently developed to meet the needs of all learners. Gaps in pupil outcomes are not being closed rapidly enough.	Leaders are addressing inadequacies in the quality of education, personal development, behaviour and attitudes. Plans are in place but are yet to be fully implemented.	Leaders actions enhance the quality of education, personal development, behaviour and attitude. Leaders engagement with the school community is focused and has purpose.
		School leaders consistently fail to promote equality of opportunity and/or discriminatory behaviour. Leaders are not taking effective action to ensure staff wellbeing, including workload.	School leaders recognise and are beginning to address failures in equality of opportunity. Leaders are aware of weaknesses relating to staff wellbeing and are starting to address these.	Leaders are actively addressing historical and current failures in equality of opportunity, although some gaps still exist. Leaders are realistic and constructive in the way they manage staff; however, some minor issues are to be addressed.	Leaders consistently promote equality of opportunity and diversity. Prejudicial behaviour from adults or children is not tolerated. Leaders are realistic and constructive in the way they manage staff, including workload.
		All policies and practice designed to address bullying, prejudice and discriminatory behaviour are ineffective resulting in a high number of incidents.	Strategies to address bullying, prejudice and discriminatory behavior and their implementation are inconsistent resulting in a high number of incidents.	Implementation of the strategies to address bullying, prejudice and discriminatory behaviour are inconsistent resulting in some incidents however these are reducing.	Policies and practices to address bullying, prejudice and discrimination are in place and there are few incidents.
	<b>Safeguarding</b>	Safeguarding is ineffective. There are serious or widespread failures in safeguarding policy and arrangements, including SCR and safer recruitment. Statutory requirements are not being met and insufficient action is being taken to remedy weaknesses following a	There are some weaknesses in safeguarding arrangements, that are easy to put right and do not result in children being at risk of harm.	Safeguarding is effective with any individual minor oversight being addressed immediately.	Safeguarding is effective.
	<b>Critical Risk</b>	<b>Significant Risk</b>	<b>Moderate Risk</b>	<b>Low Risk</b>	