



**LIGHTHOUSE**  
SCHOOLS PARTNERSHIP

# RISK MANAGEMENT POLICY

## Statutory

Policy Approved by the Board of Trustees

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Document History

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1.0	Clare Sanders	August 2016	Based on information sourced from EFA and NAHT Model Policies
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This Policy applies to all schools and employees within the Lighthouse Trust Partnership.

# RISK MANAGEMENT POLICY

## Statutory

### 1. Introduction

This risk management policy forms part of the Trust's internal control and governance arrangements. The policy explains the Trust's underlying approach to risk management. It details key aspects of the risk management process, and identifies the main reporting procedures. It describes the process the Trust uses to evaluate the effectiveness of the Trust's internal control procedures.

### 2. What is “risk”?

“Risk” is: An event or cause leading to uncertainty in the outcome of the Trust’s operations.

### 3. Why we need to manage risk

Daily we manage risk without describing this as “risk management”. We consider what might go wrong and take steps to reduce the impact if things do go wrong. However, the Trust cannot rely on informal processes. Also, as a public body, we must provide assurance to the Education and Skills Funding Agency, the Charity Commission, Ofsted and Auditors that we are managing risk correctly. We need to formally identify organisational risks and mitigating actions.

### 4. Who should think about risk?

The Trust’s Chief Executive Officer (CEO) and Chief Financial and Operating Officer (CFOO), and Senior Leadership Teams (SLT) in individual schools (HT, DHT and SBM). All of these postholders should consider both existing risks and think about any new risks.

The Members, LSP Trust Board, Local Governing Bodies and other sub committees also have a role. The Trust’s Audit & Risk Committee has a responsibility to advise the Trust Board and to oversee this area of the Trust’s operations. Because of this, the risk register will be taken to relevant groups as appropriate.

### 5. When to consider risk

Risk needs to be considered whenever decisions are made. In particular, as the organisations aims develop during the planning round, the CEO, CFOO,

School SLT members, LSP Trust Members, Trustees and Governors need to consider afresh existing organisation risks; looking at what we want to do over the next few years and identifying risks which may arise. Timing is important if mitigating actions are to be included in business plans.

## 6. Risk appetite

“Risk appetite” is an expression of how much risk an organisation is prepared to take. It can vary over time and from work area to work area. If the Trust’s risk appetite is clearly articulated staff can take this into account when making their decisions.

## 7. Approach to risk management

The following key principles outline the Trust’s approach to risk management:

- As the principal executive and policy-making body of the Trust, the Trust Board is responsible for risk management.
- The Trust is responsible for maintaining a sound system of internal control that supports the achievement of policies, aims and objectives.
- There should be an open and receptive approach to mitigating risk.
- The Audit & Risk Committee advises the Trust Board on risk management.
- The Trust takes a conservative and prudent approach to the recognition and disclosure of the financial and non-financial implications of risks.
- The Headteachers and Local Governing Bodies are responsible for encouraging and implementing good risk management practice within the Trust and its schools.
- Headteachers and SLT of each school within the Trust are responsible for encouraging and implementing good risk management practice within their areas of responsibility.
- Early warning mechanisms will be put in place and monitored to alert the Trust so that remedial action can be taken to manage any potential hazards
- The CFOO has a moderation role and will review key risks at each school with the Headteacher, where necessary, and reports outcomes of these discussions to the Board.
- Identified risks must be controlled and monitored by risk assessments.

## 8. The risk register

The risk register steers risk owners into considering risk appetite when updating a risk entry. They need to consider not only the risk status before and after existing mitigating action but also the final tolerable risk status;

i.e. what they are aiming for in terms of status for that particular risk. A template risk register is provided as Appendix A. This template is available from the Trust as an excel spreadsheet.

The Charity Commission says that the process of risk identification should be undertaken with care, the analysis will contain some subjective judgements - no process is capable of identifying all possible risks that may arise. The process can only provide reasonable assurance to trustees that all relevant risks have been identified.

Identified risks need to be put into perspective in terms of (1) the potential severity of their impact and (2) likelihood of their occurrence. Assessing and categorising risks helps in prioritising and filtering them, and in establishing whether any further action is required.

This approach attempts to map risk as a product of the likelihood of an undesirable outcome and the impact that an undesirable outcome will have on the Trust's ability to achieve its operational objectives. It enables the trustees to identify those risks that fall into the major risk category identified by the risk management statement. This is called the "Risk Status"

The process begins with listing each of item of risk. Once identified each risk is looked at and a decision taken as to how likely it is to occur and how severe its impact would be if it did occur.

This policy has drawn the descriptors for 'impact' and 'likelihood' from the Charity Commission (CC26) publication as follows:-

Likelihood of occurrence (5=highly probable, 1=remote)	Descriptor	Criteria
1	Remote	May only occur in exceptional circumstances
2	Unlikely	Expected to occur in a few circumstances
3	Possible	Expected to occur in some circumstances
4	Probable	Expected to occur in many circumstances
5	Highly Probable	Expected to occur frequently and in most circumstances

Impact if occurs (5=catastrophic, 1=insignificant)	Descriptor	Impact on service and reputation
1	Insignificant	<ul style="list-style-type: none"> <li>• no impact on service</li> <li>• no impact on reputation</li> <li>• complaint unlikely</li> <li>• litigation risk remote</li> </ul>
2	Minor	<ul style="list-style-type: none"> <li>• slight impact on service</li> <li>• slight impact on reputation</li> <li>• complaint possible</li> <li>• litigation possible</li> </ul>
3	Moderate	<ul style="list-style-type: none"> <li>• some service disruption</li> <li>• potential for adverse publicity - avoidable with careful handling</li> <li>• complaint probable</li> <li>• litigation probable</li> </ul>
4	Major	<ul style="list-style-type: none"> <li>• service disrupted</li> <li>• adverse publicity not avoidable (local media)</li> <li>• complaint probable</li> <li>• litigation probable</li> </ul>
5	Extreme/Catastrophic	<ul style="list-style-type: none"> <li>• service interrupted for significant time</li> <li>• major adverse publicity not avoidable (national media)</li> <li>• major litigation expected</li> <li>• resignation of senior management and board</li> <li>• loss of beneficiary confidence</li> </ul>

The risk score is arrived at by multiplying the likelihood score by the impact score and then adding the impact score to this number in order to give extra emphasis to impact when assessing risk. This provides the risk score

It should be remembered that risk scoring often involves a degree of judgement or subjectivity. To achieve risk score consistency, it is recommended that calculations are completed by more than one person, and that wherever possible these personnel remain the same. Where data or information on past events or patterns is available, it should be used to enable a more evidence-based judgement. A traffic light and numerical indicator is used to show the gross risk status as detailed in the table below.

Impact	Extreme/Catastrophic	5	10	15	20	25	30
	Major	4	8	12	16	20	24
	Moderate	3	6	9	12	15	18
	Minor	2	4	6	8	10	12
	Insignificant	1	2	3	4	5	6
			1	2	3	4	5
			Remote	Unlikely	Possible	Probable	Highly Probable
			Likelihood				

Red - risks that score 15 or more

Amber - risks that score between 8 and 14

Green - risks scoring 7 or less.

Appendix B shows what should be inserted in each column on the risk register.

## 9. Options for dealing with risk

There are various categories for dealing with risk. These options should be considered for all items on the risk register:

**Transfer:** For some risks the best response may be to transfer them. This might be done by conventional insurance, or it might be done by paying a third party to take the risk in another way. This option is particularly good for mitigating financial risks of risks to assets.

**Tolerate:** The exposure may be tolerable without any further action being taken. Even if it is not tolerable, ability to do anything about some risks may be limited, or the cost of taking any action may be disproportionate to the potential benefit gained. In these cases the response may be toleration. This option may be supplemented by contingency planning for handling the impacts that will arise if the risk is realised. This option should only be considered for risks with a green risk status.

**Treat:** By far the greater number of risks will belong to this category. The purpose of treatment is not necessarily to obviate the risk, but more likely to take control action to contain the risk to an acceptable level. Such controls can be corrective, detective, directive or preventive.

**Terminate:** Some risks will only be treatable, or containable to acceptable levels, by terminating the activity. It should be noted that the option of termination of activities may be severely limited in the public sector when compared to the private sector; a number of activities are conducted in the public sector because the associated risks are so great that there is no other way in which the output or outcome, which is required for the public benefit, can be achieved.

**Take Opportunity:** this option is not an alternative to those above; rather it is an option which should be considered whenever tolerating, transferring or treating a risk. There are two aspects to this. The first is whether or not at the same time as mitigating threats, an opportunity arises to exploit a positive impact.

The second is whether or not circumstances arise which, whilst not generating threats, offer positive opportunities - for example a drop in the cost of goods or services might free up resources for redeployment.

Once action is taken to mitigate each risk a net risk score is considered and colour coded as above. This doesn't mean the risk is necessarily diminished in any way, but it does mean the significance of the risk, and particularly the likelihood of it occurring should be less.

In order for a risk register to not become unnecessarily large and unmanageable over time, risks that have been mitigated to a tolerable level of low risk, and which are no longer considered to be a significant may be closed. Closed risks should be filtered so that they do not appear on the main risk register, although they should be reopened if the risk reemerges.

## 10. Roles and responsibilities

Individual schools will maintain their own risk registers with a Trust wide register also maintained. Federated schools may wish to have a single risk register that applies to both schools, with each risk annotated to denote if it relates to both schools or just one. See Appendix A, which shows the additional 'school specific risk' column that is required for a Federated school risk register. This template is available from LSP as an excel spreadsheet.

### **The Trust's Chief Executive Officer (CEO) and Chief Financial and Operating Officer (CFOO) & School Senior Leadership Teams (HT, DHT & SBM)**

- Identify organisation risks, reporting to appropriate Governors/Trustee committees.
- Perform a detailed review of organisation risks and mitigating actions.
- Consider risk when making decisions.
- Articulate a risk appetite when making decisions.
- Remain alive to other risks that might develop in year.

### **Local Governing Body Committees (every Meeting)**

- Consider new risks raised at the meeting by SLT members either through agenda items or resulting discussions - add to risk register using above matrix
- Review outstanding risks
- Amend the table at the bottom of the risk register to reflect the dates the risk register was amended and/or reviewed
- Report to LGB through committee report, if applicable, on outstanding/new risks
- Provide the risk register to the Audit and Risk Committee three times per year, as per the Annual Planner.

## **Audit and Risk Committee**

- Review quality of the risk registers for individual schools and the Trust's overall risk register three times per year and all the risks with a red net risk score at each meeting
- Identify individual school risks that should be added to the Trust's overall risk register
- Identification of additional organisation risks
- Question inconsistencies in the Risk Register
- Ensure the register is maintained and kept up to date
- Advise and report to Board of Trustees three times per year

## **Board of Trustees**

To manage the risk management process ensuring that they:

- Receive reports from the Audit and Risk committee
- Review risks identified as red in the net risk score three times per year and all other risk areas at least annually

Louise Malik, Chief Financial and Operating Officer



Appendix A



Register of risks for:	LIGHTHOUSE SCHOOLS PARTNERSHIP - Company number 07662102
SCHOOL/ORGANISATION:	

Ref LSP Risk #	Date Created	Date Closed	Open/Closed	Description of Risk	School Specific Risk <small>(this column applies to Federated schools only)</small>	Early Warning Indicators (Controls in Place/Monitoring) Pre-Mitigation	L	I	Gross Risk Score	Mitigation Additional Controls in place	L	I	Net Risk Score	Response Actions (Record additional actions that are planned to ensure greater control over the risk)	Risk Owner
							1 - 5	1 - 5	L x I + I		1 - 5	1 - 5	L x I + I		

Term	Date of Meeting	Register updated by

## Appendix B

### GUIDANCE NOTES

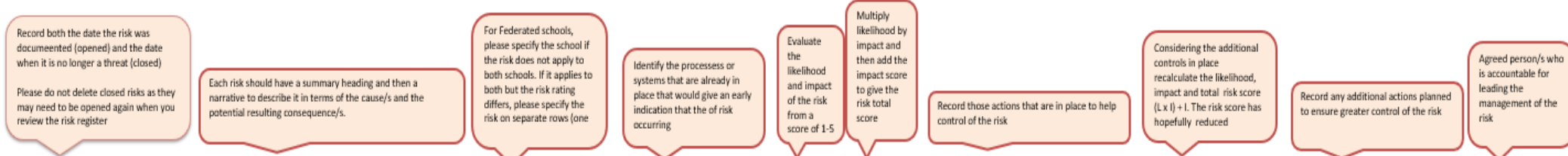
These guidance notes will help you complete your schools risk register. If further help is needed please read the LSP Risk Management Policy or contact the LSP Compliance Officer.

A risk register is mandatory for all academies and must be reviewed regularly, including as an agenda item for all Governors meetings.

The first step is to identify risks. The idea is not to create as many risks as possible, as this would make the Risk Register more difficult to maintain - start with those risks that are obvious and significant. Risks can relate to Health and Safety, Safeguarding, Curriculum, Operations, Finance, Reputation and External Risks.

Risk scoring involves a degree of judgement or subjectivity. Please refer to the definitions on the LSP Risk Register template and use data or information for past events to help with an evidence based judgement. Discussing each risk with a member of school SLT should help to agree an appropriate score and the control measures already in place or to be implemented.

An explanation of the Risk Register headings is below.



Ref LSP Risk	Date Created	Date Closed	Open/Closed	Description of Risk	School Specific Risk (for Federated schools only)	Early Warning Indicators (Controls in Place/Monitoring) Pre-Mitigation	L	I	Risk Score	Mitigation Additional Controls in place	L	I	Risk Score	Response Actions (Record additional actions that are planned to ensure greater control over the risk)	Risk Owner
Example	24/08/2021		open	<b>Failure of the school to recruit sufficient learners</b> • Significant financial risk; • Risk that Inconsistent and ineffective communication leads to lack of engagement from parents / communities and negative reputation • Risk that the confidence of stakeholders is diminished • Viability risk		• Trend of declining roll on census • 3 year financial planning • Benchmarking compared to other local schools	4	4	20	• Admissions Policy and procedures; • Annual open evening for student recruitment • Relationship building with local schools / nurseries	3	4	16	• Marketing strategy plan to be devised by the end of term. • Feasibility study and market research to be completed this academic year for nursery to potentially be on site.	SBM & Head