	ATLAS Multi Academy Trust
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RISK MANAGEMENT POLICY
Trust sub-committee: Resources, Audit and Risk Committee
Co-ordinator: ATLAS Executive Team

Last Reviewed: Summer 2022	**Next Review: Summer 2023**

St Albans Girls' School : Beech Hyde Primary School and Nursery : The Adeyfield Academy

Signed by: **Margaret Chapman** *Executive Head Teacher*	**Signed by:** **Rachael Kenningham** *Chair of ATLAS Board of Directors*

1.	INTRODUCTION
1.1	Risk is an event or cause leading to uncertainty in the outcome of the Trust's operations; the possibility that an action or event will adversely (or beneficially) affect the Trust's ability to achieve a planned objective. The identification, assessment, monitoring, management and reporting of risks are the responsibility of every member of staff and as a consequence of managing identified risks the following will occur: • The planned objectives are more likely to be achieved; • Adverse risks are less likely to happen; • The impact of adverse risks which are realised is reduced. Risks represent opportunities as well as threats. 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 alone. Risk management is an essential component of our corporate management. Also, as a public body, we must provide assurance to the DfE that we are managing risk correctly. We do need to formally identify corporate risks and mitigating actions. This policy explains ATLAS's underlying approach to risk management, documents, the roles and responsibilities of the Board of Directors, 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 Board of Directors will use to evaluate the effectiveness of the ATLAS internal control procedures. The policy is supported by a hierarchy of other policies and procedures, which give guidance for staff and outline further sources of guidance or information.

2.	**AIMS**
2.1	ATLAS will adopt, wherever possible, recommended best practice in the identification, evaluation and cost effective control of business risks to ensure, as far as possible, that they are eliminated or reduced to a level that is acceptable to the Board of ATLAS. Furthermore, the Trust recognises and accepts its responsibilities for the welfare of all staff, students within the Trust and for visitors and contractors working on or visiting its premises or activities and the impact its activities may have on third parties. Other key policies, which should be read in conjunction with this risk policy are: • Safeguarding and Child Protection Policy • Code of Conduct Policy • Health and Safety • GDPR related policies This policy document also lays out ATLAS's specific policy in a number of risk related areas. This policy and related procedures applies to ATLAS and all of its Academies.
3.	**OBJECTIVES**
3.1	• To integrate risk management into the culture of the Trust • To continually raise awareness amongst all employees of the need for the management of business risk • To manage risk in accordance with recommended best practice • To ensure compliance with legal requirements as a minimum standard • To provide a framework for risk management • To ensure responsibilities for risk management are clearly understood • To continue to respond to changing social, environmental and legislative requirements • To comply with risk management best practice • To ensure risks facing ATLAS are identified and appropriately documented • To provide assurance to the Trustees that risks are being adequately controlled, or identify areas for improvement • To ensure action is taken appropriately in relation to accepting, mitigating, avoiding and transferring risks • To prevent injury and damage wherever possible and so reduce the cost of risk.
4.	**ROLES AND RESPONSIBILITIES**
4.1	The Trust Board have overall responsibility for managing risk. COO - Financial Risk. CEO - Risk to Educational Outcomes. Chair of Trust Board - Reputational risk. Vice Chair of Trust Board- Compliance Risk. CEO – Health & Safety Risks. The Risk Register must be formally reviewed each term by the Directors, Executive and Non-Executive who have responsibility for an area of risk. The Risk Register is a standing item on the Trust Board's agenda and they will monitor the identification and mitigation of risk within ATLAS.

5.	IDENTIFICATION OF RISKS
5.1	The Risk Management Standard states that risk identification should be approached in a methodical way, to ensure that all significant activities have been identified and all the risks flowing from these activities have been defined. Our approach to risk management is linked to eight key aims: • Control risk to create capacity for sustainable and managed growth • Provide efficient central support for the trust • Exceptional outcomes for learners • Outstanding staff, leadership and management • Outstanding buildings fit for the future • Financial strength • Outstanding well-being of all in our community • Compliance The structure and organisation of ATLAS's risk register seeks to ensure that all significant objectives and activities have been identified and the risks associated with each area have been identified. Academy Specific Risks: Academy leadership teams will identify any additional Academy specific risks not covered by the Trust. These risks will either be added to the other registers or placed on an Academy Risk Register. Each of these risks registers will identify the mitigation or avoidance strategies to be used and the owner of each risk. The registers will be updated during the year if significant new risks are identified. The Head teacher of School will inform the EHT of these new risks.
6.	EVALUATION OF RISKS
6.1	The Risk Management Standard states that risks should be evaluated against agreed criteria to make decisions about the significance of risks to the organisation. The Academy uses a 5x5 matrix to assess impact and probability as, high, medium or low, as illustrated in the diagram below:

	Likelihood					Key
Severity score	**1**	**2**	**3**	**4**	**5**	
	Rare	Unlikely	Possible	Likely	Almost certain	High
5 Catastrophic	5	10	15	20	25	Medium
4 Major	4	8	12	16	20	Low
3 Moderate	3	6	9	12	15	Negligible
2 Minor	2	4	6	8	10	
1 Negligible	1	2	3	4	5	

7.	IMPACT OF RISK OCCURING	

7.1		

Impact	Description
High	The impact will be significant, for example, the school is burnt down; Has significant stakeholder concern. Has a significant impact on the strategy or on teaching and learning
Medium	The impact will be moderate; Has no more than a moderate impact on strategy or on teaching and learning; Moderate stakeholder concern.
Low	The financial impact is likely to be low; Has a low impact on strategy; Low stakeholder concern.

8.	PROBABILITY OF RISK OCCURING		

8.1			

Probability	Description	Indicator
High	Likely to occur each year, or more than 25% chance of occurrence within the next 12 months.	Potential of it occurring several times within a 4 year period; Has occurred recently.
Medium	Likely to occur within a 4 year time period or less than 25% chance of occurring within the next 12 months.	Could occur more than once within a 4 year period; Some history of occurrence.
Low	Not likely to occur within a 4 year time period or less than 5% chance of occurrence.	Has not occurred; Is not likely to occur.

8.2	Risk appetite The term risk appetite describes ATLAS's readiness to accept risks and those risks it would seek to reduce. ATLAS's risk threshold is the boundary delineated by the red shaded area (represented by scores of 16 and above) in the risk matrix. Above this threshold, ATLAS will actively seek to manage risks and will prioritise time and resources to reducing, avoiding or mitigating these risks.
8.3	Addressing risks When responding to risks, ATLAS will seek to ensure that it is managed and does not develop into an issue where the potential threat materialises. Any risk with a score of 16+ will have a separate action plan.

	ATLAS will adopt one of the 4 risk responses outlined below:
	Avoid Counter measures are put in place that will either stop a problem or threat occurring or prevent it from having an impact on the business.
	Transfer The risk is transferred to a third party, for example through an insurance policy.
	Mitigate The response actions either reduce the likelihood of a risk developing, or limit the impact on ATLAS to acceptable levels.
	Accept We accept the possibility that the event might occur, for example because the cost of the counter measures will outweigh the possible downside, or we believe there is only a remote probability of the event occurring.
9.	**RISK REPORTING AND COMMUNICATION**
9.1	**Business Continuity Planning** - Where a risk might impact on the continuing operation of ATLAS or its Academies, the actions to be put in place should the risk occur will be recorded in the Business Continuity Plan. The maintenance of the Business Continuity Plan across all Academies will be the responsibility of the Executive Head teacher. Planning for Emergencies - A number of risks might result in the planning for emergency procedure being implemented. For example, a school minibus crash or a fire at a premises. A procedure for handling emergencies will be maintained and will include, for each Academy, key responsibilities and contact details.
9.2	**Specific Risk Policies** - Health & Safety Policy. It is the policy of the Trust that all reasonable and practicable measures will be taken to safeguard the health, safety and welfare of all employees, students and all other persons from hazards to health and safety arising out of work activities. This is in accordance with the requirements of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999. This will include provision of all necessary finances, time and any other resources to meet our legal obligations. Within the Policy on Health and Safety, it is the function of management to provide the right circumstances under which work may be carried out safely. In order to facilitate this ATLAS will: • Appoint sufficient competent persons to ensure health and safety at work. • Provide and maintain places of work that are safe and free from risks to health. • Provide and maintain plant, equipment and procedures that are safe and without risks to health. • Ensure safety and absence of risk in connection with the handling, operation, storage, transport and use of articles, equipment, machines or substances. • Provide information, instruction, training and supervision as is necessary, to ensure the competence of its staff in respect of their health and safety at work. All staff and students have a duty to comply with the relevant legislation and to co-operate in efforts made to create safe working conditions. In particular they must: • Use properly the means and facilities provided to ensure health and safety at work. • Not misuse or interfere with anything provided in the interests of health, safety and welfare. • Not take any action that could endanger themselves or others. • Use equipment, chemicals and machinery in accordance with training and instructions given. • Inform the appropriate Health and Safety Officer immediately of any situation or matter that represents a serious and immediate danger or a shortcoming in safety precautions.
9.3	Health and Safety Risks will be monitored by an external consultant - Herts County Council, Health and safety. They use the following risk ratings:

"**High Risk**" relates to the highly probable occurrence of a fatal or major injury or irreversible health effect (Red).
"**Medium Risk**" relates to the possibility of a serious injury or serious health effect (Amber).
"**Low Risk**" relates to the occurrence of a minor injury or reversible minor health effect (Green).

HIGH RISK	MEDIUM RISK	LOWER RISK
Immediate Action Required	**Short Term Action Required**	**Longer Term Action Required**

Required Actions Identified	Required Actions Identified	Required Actions Identified
16+	**9-15**	**1-8**

The Policy on Health and Safety also contains details of the chain of responsibility and these are contained in the organisation section. Responsibilities for all levels of employees and students are to be explained in their induction training. Information on the instructions or compliance with applicable regulations and codes of practice or specific hazards are contained in the arrangements section of the Health and Safety Policy. Training will be given to specific employees on how to meet the responsibilities placed on them. The co-operation of every employee and student is necessary to enable excellent standards wherever possible. The Health and Safety Policy will be reviewed and procedures will be audited as and when required and at regular intervals not exceeding 24 months. An audit will be completed by a competent person and aims to provide an objective view of the state of health and safety arrangements. A written summary of the annual audit findings will be submitted and copies given to respective officers and Trustees with responsibility. An annual report containing a summary of main findings will be submitted to the Board in a health and safety report by the EHT.

The aim of reporting risk is to provide assurance to the Trustees, Executives and Auditors that academies are effectively managing its risks and has a robust system of internal controls.

10.	**RISK REGISTER**
10.1	The reporting mechanism will be ATLAS's Risk Register. This will highlight the key risks facing ATLAS, as well as a breakdown for each key strategic aim. The Risk Register will be monitored by the Trustees on a termly basis. Any significant changes in risk impact or probability, or the occurrence of an event which raises the profile of a risk will be recorded on the risk register as it occurs. Any new or increased risks identified by Executive Team, Trustees or raised by a member of staff will be evaluated and, if appropriate, recorded in the Risk Register. *See Appendix 2.*

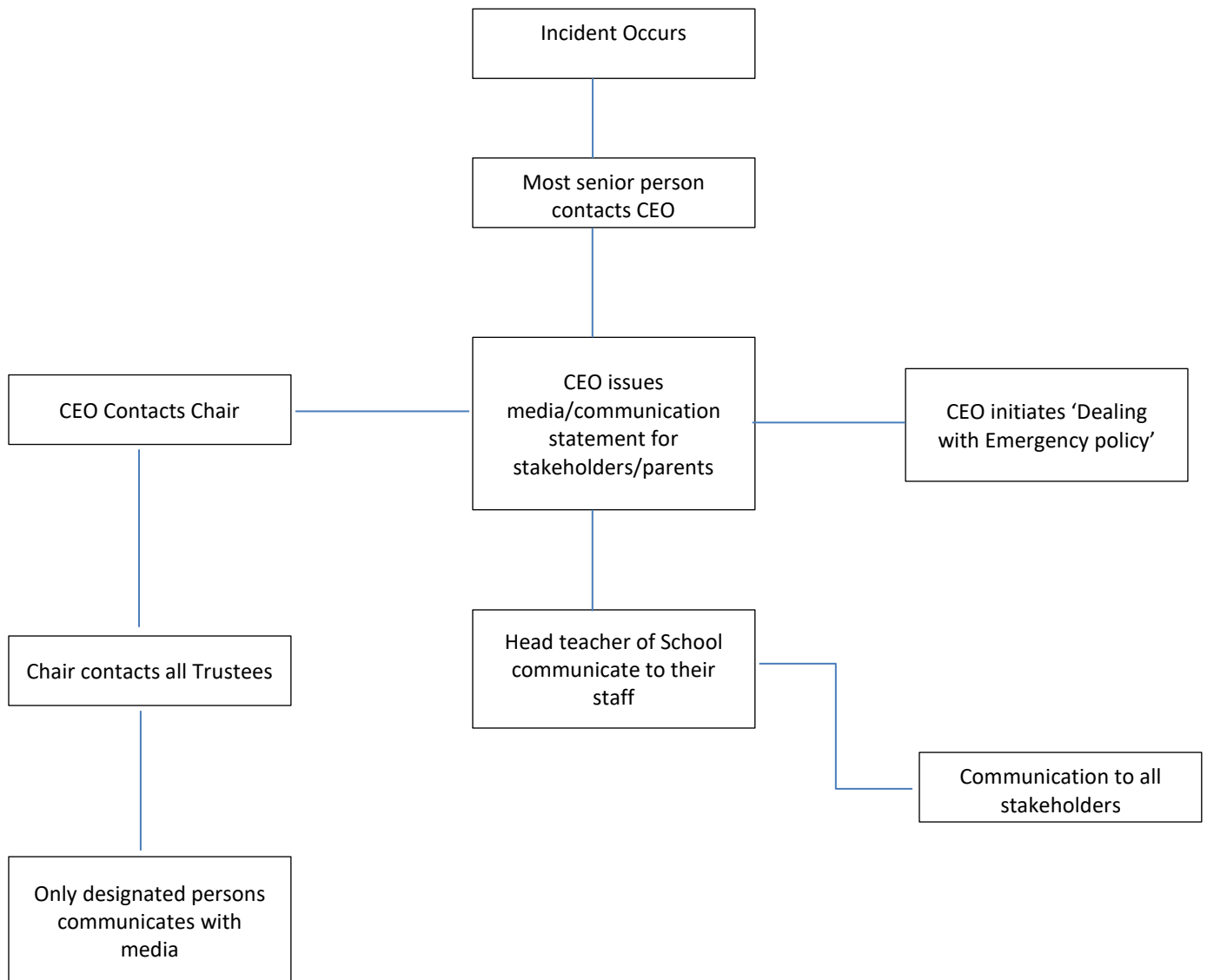| 10.2	**Communicating Risks**
	The Trustees monitor the risk register each term. The EHT will ensure that any perceived new or increased risks or significant failure of risk management control measures are considered and reported to the Trust Board, along with a summary of actions taken.
	All Directors Executive/Non-Executive will endeavour to raise awareness that risk management is a part of ATLAS's culture and seek to ensure that: • individual members of staff are aware of their accountability for individual risks; • individuals report promptly to senior management any perceived new risks or failure of existing control measures.
10.3	**Annual Risk Review and Assessment**
	The Internal Auditor review provides an annual assessment of the effectiveness of the trust's management of risk as part of the Governance and Risk audit.
	The CEO will prepare an annual review of risk for the Trustees in the autumn term. This will enable the CEO to report to the Trustees on: • The significant risks facing the Trust; • The effectiveness of the risk management processes; • That the Academy has published a risk management strategy covering risk management philosophy and responsibilities.
11.	**Areas for improvement**
11.1	Categories of Risk The risk categories defined by the Treasury are set out below for reference • External Risks Risks arising from the external environment, not wholly within the organisation's control, but where action can be taken to mitigate the risk • Political Political constraints such as change of government • Economic Interest rates, exchange rates, inflation • Socio Cultural Demographic Change affecting demand for services Change of stakeholder expectations • Technological Obsolescence of current systems Procurement and best use of technology to achieve objectives • Legal / Regulatory Laws and regulations which impose requirements (e.g. health & safety and employment legislation) • Environmental The need for buildings to comply with changing standards (e.g. energy efficiency) equipment to comply with changing standards
11.2	**Strategic/Operational Risks** Risk relating to delivery of current activities, building capacity and capability **Operations** capacity and capability to achieve objectives; procedures employed **Service/Project Delivery** failure to deliver the agreed service **Resources**

Financial - availability and allocation of funding; poor budget management

Physical - security against loss, damage and theft of physical assets, and fraud including identification of areas which can be insured

Human - availability, retention, skills and capacity of staff Information - adequacy of information for decision making; security of information against loss, damage, theft and fraud

Relationships - threats to relationships with delivery partners; customer satisfaction; accountability (particularly to Parliament)

Such relationships include ICT Support Contract, Utilities Suppliers, providers of maintenance contracts for facilities, including fire and intruder alarms etc.

Reputation - confidence and trust which stakeholders have in the organisation

Governance - propriety and regularity; compliance with relevant requirements; ethical considerations

Scanning - failure to identify threats and opportunities

Resilience - capacity of accommodation, systems and ICT to withstand adverse impacts and crises; contingency planning and disaster recovery (e.g. fire, flood, failure of power supply, failure of transport systems)

11.3	**Change Risk** Created by decisions to pursue new endeavours beyond current capability **Public Sector Targets** - new funding regime/formulae being applied to GAG funding **Change Programmes** - programmes for organisational or cultural change threaten current capacity to deliver as well as providing opportunity to enhance capacity, for example the RSC requests the Trust to absorb several academies at once **New Projects** - making optimal decisions/prioritising between new activities that are competing for resources (example for a MAT would be capacity to manage new conversions), for example allocation capital grant monies

Critical Incident Procedure

General Incident Response

Communication to Stakeholders

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                          ┌──────────────────────┐
                          │    Incident Occurs    │
                          └──────────┬───────────┘
                                     │
                          ┌──────────┴───────────┐
                          │   Most senior person  │
                          │     contacts CEO      │
                          └──────────┬───────────┘
                                     │
┌──────────────────┐      ┌──────────┴───────────┐      ┌──────────────────────┐
│ CEO Contacts Chair├──────┤      CEO issues       ├──────┤ CEO initiates 'Dealing │
└────────┬─────────┘      │  media/communication  │      │ with Emergency policy' │
         │                │    statement for      │      └──────────────────────┘
         │                │  stakeholders/parents │
         │                └──────────┬───────────┘
         │                           │
┌────────┴─────────┐      ┌──────────┴───────────┐
│Chair contacts all │      │ Head teacher of School│──────┐
│     Trustees      │      │  communicate to their │      │
└────────┬─────────┘      │         staff         │      │
         │                └──────────────────────┘      │
         │                              ┌────────────────┴─────┐
┌────────┴─────────┐                    │  Communication to all │
│Only designated    │                   │     stakeholders      │
│persons            │                   └──────────────────────┘
│communicates with  │
│     media         │
└──────────────────┘
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Appendix 2 – see risk register