



Simul autem et crescere luceat
Together we grow and shine

Fountain Head House School Risk Management Policy

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POLICY FOREWORD

This policy aims to ensure that all stakeholders (including staff, parents/carers and placing authorities) are clear about the school's procedures and when managing risks.

The policy also aims to ensure that the School Board, Senior Leadership Team and all staff are clear about where the responsibility for risk management lies.

Risk Management

The School Board of the Fountain Head House School have overall responsibility and ultimate decision making authority for all the work of the school. This is largely exercised through strategic planning and the setting of policy. It is managed through business planning, monitoring of budgets, performance management, the setting of standards and the implementation of quality management processes. The School Board have the power to direct change where required.

The School Board have delegated authority to the Headteacher, who in turn also fulfils a strategic role in the conduct of the school. There is further delegation to the Business Manager who is responsible for the internal organisation, management and control of the risk register and operational aspects of risk management on a day to day basis, and as part of implementing actions to remove or mitigate identified risks.

Risk management must prioritise and protect:

- Safeguarding, which is high quality
- The effective education and future of the pupils
- The reputation and ethos of the school
- The common good in terms of the interests of the families in the communities served by the school and the School Board
- The delegation and the balance struck between the School Board's and the Headteacher's responsibility.

All major risks to which the school is exposed are contained in a risk register that is reviewed by the Headteacher in liaison with the Business Manager, members of the Senior Leadership Team and the School Board. Identified risks are owned by the School Board with policies, systems and procedures in place to manage these risks. The school's Risk Register is owned by the Headteacher, and reviewed by the School Board.

Risk is inherent in everything the school does to deliver high quality services. Risk management is an essential part of governance and leadership and an integral part of business planning and decision-making processes.

The school considers risk management at four levels:

Risk Management level 1 – management and staff who own and manage risk on a day-to-day basis.

Risk Management level 2 – the School Board who oversee the effectiveness of the risk management framework.

Risk Management level 3 - the internal scrutiny function which provides independent assurance on the overall effectiveness of risk management and controls.

Risk Management level 4 - assurance from external independent bodies such as the external auditors and other external bodies.

This Risk Management Policy involves the identification, measurement, management, monitoring and reporting of threats to the school's business objectives. Such threats can arise from a wide variety of sources such as litigation relating to safeguarding failures, financial uncertainty from a falling roll, security risk from inappropriate access to data, property risk from fire or flood, accidents resulting in injury, natural disasters, and of course a global pandemic. School leaders identify risks and implement appropriate mitigating control measures as part of normal business, for example, managing the risks associated with school trips.

Risk management is not about adding new processes, but ensuring processes are integrated in the management and operation of businesses. Effectively managing risk informs business decisions, enables a more effective use of precious resources, enhances strategic and business planning and strengthens contingency planning.

Minimum standard of Risk Management will include

- a) maintaining the properties in a satisfactory state of repair
- b) taking all reasonable precautions for the safety of the properties
- c) taking all reasonable precautions to prevent loss, destruction, damage, accident or injury
- d) undertaking reasonable checks when employing members of staff
- e) setting and maintaining systems for the protection of property, employees, pupils and third parties
- f) compliance with the laws of England and Wales

The following is a list of the key pieces of legislation and Approved Codes of Practice which the School must comply with:

- a) The Health and Safety at Work Act 1974
- b) The Management of Health and Safety at Work Regulations
- c) Workplace (Health, Safety and Welfare) Regulations

- d) The Regulatory Reform (Fire safety) Order
- e) Electricity at Work Regulations
- f) Control of Asbestos Regulations
- g) The Control of Legionella Bacteria in Water Systems L8
- h) Control of Lead at Work Regulations
- i) Ionising Radiation Regulations
- j) Provision and Use of Work Equipment Regulations
- k) Lifting Operations and Lifting Equipment Regulations
- l) Work at Height Regulations
- m) Pressure Equipment Regulations
- n) Pressure Systems Safety regulations
- o) Gas Safety (Installation and Use) Regulations
- p) Construction (Design and Management) Regulations
- q) Health and Safety (First Aid) Regulations
- r) Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
- s) Health and Safety (Consultation with Employees) Regulations
- t) Control of Substances Hazardous to Health
- u) Health and Safety (Display Screen Equipment) Regulations
- v) Manual Handling Operations Regulations
- w) Personal Protective Equipment Regulations

Operation of the Risk Management Policy

The responsibility of the School Board

Although ultimate overall responsibility for risk management, including the oversight of the risk register, lies with the School Board, the School Board delegates responsibility to the Headteacher and Business Manager to:

- direct the schools' programme of risk oversight
- ensure that risks are being addressed appropriately through policy and practice
- report to the School Board on the adequacy of the schools's internal risk control framework, including financial and non-financial controls and management of risks.

The responsibility of the Headteacher

It is the responsibility of the Headteacher to implement, monitor and verify such policies and procedures to facilitate an annual statement of compliance to identified risks. The Headteacher should take such steps needed to meet their legal obligations including the requirements of the Department for Education, and to comply with the Education (Independent School Standards) Regulations 2014 as they relate to the operation of the school.

The Headteacher should provide resources to mitigate identified risks and declare any non-compliance to the School Board. The Headteacher delegates to the Business Manager the commissioning on a regular basis of external verification of internal systems so as to ensure the systems fitness for purpose and compliance to current standards.

The responsibility of the Business Manager

The Business Manager will present the Risk Register to the School Board at scheduled Finance and Estates Board Meetings when this will be reviewed.

The Business Manager will liaise with the Headteacher on a termly basis to consider and update the School's Risk Register. The School's Risk Register will be submitted to and reviewed by the School Board annually.

The Business Manager has overall responsibility for risk management on a day-to-day basis.

The responsibility of the Senior Leadership Team

Each member of the Senior Leadership Team is responsible for identifying, reporting and supporting the management of risks pertaining to their specific areas of responsibility.

The responsibility of the School Staff

Each member of the School Staff is responsible for following all the school's policies and procedures which, in turn, will minimise risks; for reporting any potential risks they identify; for conducting themselves in the most professional way as part of the Staff's Code of Conduct and Teachers Standards.

Assessing and managing risks

Risk assessments identify measures to control risks during school activities. Health and safety law requires the school to assess risks and put in place proportionate control measures. The law also requires it to record details of risk assessments, the measures taken to reduce these risks and expected outcomes.

The school needs to record significant findings of the assessment by identifying:

- the hazards
- how people might be harmed by them

- what they have in place to control risk

Records of the assessment should be simple and focused on controls. Outcomes should explain to others what they are required to do and help staff with planning and monitoring.

Risk assessments consider what measures you need to protect the health and safety of all:

- staff
- pupils
- visitors
- contractors

The school will need to think about the risks that may arise in the course of the school day. This could include anything related to the school premises or delivery of its curriculum, whether on or off site.

Principal Risks and Uncertainties

The School Board have assessed the major risks and uncertainties to which the school is exposed. The main categories of risks for the School Board on the register are as follows:

- **Finance and Operations** – including funding and liabilities; culture, strategy, resource allocation, capital strategy, growth and capacity
- **High Quality and Inclusive Education** – including Curriculum (Intent, Implementation, Impact); progress towards EHCP outcomes; academic progress from starting point; Preparation for Adulthood including routes to qualifications; School Improvement; Culture; Curriculum; Pupil outcomes; Accessible to all; Inclusive pastoral support; Behaviour and attendance; Destinations; Collaboration
- **Reputation** - reputational risks, including safeguarding; including high level risks from identified pupils
- **Leadership and Governance** – the accountability and responsibility of the School Board and the Senior Leadership Team of the school; Workload, Retention, Working environment, ECTs, CPD, Career Progression, EDI, Safer Recruitment
- **Estate Management** - including health and safety, capital and maintenance
- **School Force** - recruitment and retention principles, including safer recruitment and staff development

The Nature of the Risks

The ethos and character of the school and the academic standards attained

The Headteacher should report to the School Board on any inspections by the Independent Schools Inspectorate (ISI) or other inspections and reports.

Equally the School Board should be informed of trends and actual academic outcomes and other key indicators identified by the Independent Schools Inspectorate (ISI) or any regulatory body.

The Headteacher is, therefore, creating the conditions for the School Board, if there are possible concerns, to broker support and advice to minimise the possibility of the Secretary of State using their reserve powers in relation to the school for which the School Board is responsible.

The safeguarding of those involved

The School Board and the Headteacher are required to follow the school's safeguarding (including safer recruitment and e-safety) policies which comply with the requirements of the local area safeguarding partnerships.

The employment of those involved

The School Board and the school have a suite of legally compliant and common personnel policies, supported by advice and insurance. The policies have been adopted by the School Board.

The stewardship of the premises and site

The School Board reserve the right to direct the school with regard to the insurance of property (buildings, land and assets) and to approve and be kept informed of planned capital works. The school should use approved health, safety and welfare policies, use systems to monitor compliance with regulation and good practice and externally assess these regularly. The school must carry out a health and safety audit to record the following (see below):

- Statutory inspections
- Building structure and fabric
- Fire safety and regulations
- Heating, ventilation and heating
- Electrical safety
- Fire safety
- External areas
- Other building services and fixed equipment

Area		Requirement	Statutory or recommended	Frequency
STATUTORY INSPECTIONS	Fixed electrical supply/installation	Inspection and test	Statutory	5 Years
	Lifts and lifting equipment	Statutory inspection	Statutory	6 monthly
	Asbestos	Review of asbestos register and management plan	Statutory	Annual
	Alarms	Annual detailed service and Inspection	Statutory	Annual
	<u>Fire fighting</u> equipment	Fire extinguisher inspection	Statutory	Annual
	<u>Fire fighting</u> equipment	Fire blanket inspection	Statutory	Annual
	<u>Fire fighting</u> equipment	Hose Reels Inspection	Statutory	Annual
	<u>Fire fighting</u> equipment	Fixed fire suppression systems inspection and test	Statutory	Annual
	Gas installations	Gas safety inspection and servicing	Statutory	Annual

The financial integrity of the school

The School Board have set a financial framework and carry out financial meetings on a regular basis to ensure budgets are adhered to and forecasting is in place to avoid operating at a deficit.

The capacity of the School Board and the Headteacher

The School Board and the Headteacher will be expected to make an annual self-assessment of the skills and experience they require and their capacity to fulfil those requirements.

All School Board and any other members of the Local Advisory Board are required to hold an enhanced Disclosure and Barring Service (DBS) certificate and to make a declaration of interests, including any conflict of interest, at the beginning of each meeting.

The School Board will ensure that good quality legal advice is available to the Headteacher and those responsible for running the school on a day to day basis.

The School Board also delegates to its committees:

- Local Advisory Board
- Curriculum, Quality and Standards
- Finance and Estates

Identification of Risk

At the risk identification stage, all potential events that are a threat to the achievement of business objectives (including not capitalising on opportunities) are identified, defined and categorised:

- **Internal risks** - these are risks over which the School Board has some control, by managing them through internal controls/ additional mitigating actions. Examples of such risks include health and safety risks, data security.
- **External risks** - external events/perils and resilience to such events. Examples of such risks include a pandemic and extreme weather.
- **Strategic risks** – these are risks to the achievement of the school's core objectives. For example, the risk of high staff turnover or expensive staffing structures.
- **Project risks** – risks associated with any critical projects the school may be involved in. For example slippage on the delivery timescale for a new major project.

Events that appear to be negative, but which do not have any direct impact on business objectives, may not be risks at all. This will be achieved through a focus on the following objectives, which provide the structure to the risk register:

1. **Building a strong infrastructure, support and accountability framework**
2. **Raising attainment, sustaining and improving progression**
3. **Providing excellent teaching, learning and classroom support**
4. **Supporting pupils' personal development, behaviour and welfare**
5. **Ensuring strong leadership for the School at strategic and operational levels**
6. **Ensuring high quality for the stewardship of the premises and sites, including health and safety**

Whilst risk management assessment at board level will focus on the highest priority risks, which will have the greatest impact on the school, there is also a need for the Headteacher, the Business Manager and other members of the Senior leadership Team to assess operational risks. The Headteacher has the responsibility to oversee that all categories of risk are identified and must extend to ensuring the risks at the school are being assessed and addressed appropriately.

The risk climate can change rapidly, and it is important emerging risks are carefully assessed and where appropriate are reflected in the risk register.

Risk register measurement

Once risks have been identified it is important to measure them to give a standard for comparing the risks consistently. The aim of assessment is to understand better each specific instance of risk, and how it could affect business objectives.

In addition to identifying the owner and allocating an identifier, the risk register identifies the following:

- The business objective threatened, arrived at from the School Board's strategy for growth
- Category, description, early indicators, triggers and impact, which are categorised to help tease out other likely risks and to avoid duplication.
- Mitigation, controls and evidence to support this judgement
- Source of assurance, responsibility and monitoring

Measurement consists of assessment, evaluation, and ranking

- **The estimated likelihood that the risk will occur.**
 1. extremely unlikely; rare occurrence
 2. unlikely
 3. moderately unlikely
 4. very likely; regular occurrence
 5. highly likely
 6. extremely likely; frequent occurrence
- **The estimated impact of the risk if it materialised (financial/reputational)**
 1. not critical to continued operations, teaching and learning
 2. minor impact in limited areas
 3. minor impact in many areas
 4. significant impact; would not affect operations in short term but might in long term
 5. significant impact; in medium term; relates to substantial operational areas
 6. fundamental to continuing operations
- **The residual risk that remains after control measures and treatment are in place**
 1. School Board and Headteacher control assurance
 2. Ofsted and regulatory framework
 3. DfE regulations and guidance
 4. National policy
- **The inherent (gross) risk score** - this is the combined score of the estimated likelihood and impact, without control measures being implemented. It is also known as the inherent risk.
- **The net risk score** – the risk that remains after control measures have been put in place. This is essentially a re-assessment of likelihood and impact assuming that control measures are in place. It is also known as the residual risk.
- **Risk Level** - 24+ High, 15-24 Medium, 1-14 Low

- **Risk ranking** – the register can be interrogated and ranked according to description, inherent and residual risk
- **Control matrix** – each section of the register has a matrix to record monitoring and contingency plans, including the treatment of the risk.
- **Contingency plan** – an action plan to address the risk if it does materialise and what plans are in place to mitigate the risk. It is a requirement that the School Board management of risks must include contingency and business continuity planning.
- **Risk owner** – the person responsible for deciding whether the risk trigger needs to be activated and managing the control measures and contingency plans. This should always be an identifiable individual who will ensure effective communication where necessary.
- **Date of last review** – this is an indication of when the audit and risk committee or the board last reviewed the risk. It may be that the risk climate has changed, and the risk level is of a sufficient level that it can be retired from the register. A date supports regular monitoring of risk.
- **Current status of risk** – this should include any comments that will support the review of the risk at the appropriate time.
- **Risk retired date and rationale** – this is an important element as it is an audit of any risks that have been considered by the School Board and later retired.

School Board Risk Tolerance

Tolerating risk is where no action is taken. This may be because the cost of instituting controls is not cost-effective or the risk or impact is so low that they are considered acceptable. Treating risk involves controlling it with actions to minimise the likelihood of occurrence or impact. There may also be contingency measures to reduce impact if it does occur.

Transferring risk may involve the use of insurance or payment to third parties willing to take on the risk themselves (for instance, through outsourcing).

Terminating risk can be done by altering an inherently risky process to remove the risk. If this can be done without materially affecting operations, then removal should be considered, rather than attempting to treat, tolerate or transfer. Alternatively if a risk is ranked highly and the other potential control measures are too expensive or otherwise impractical, the rational decision may well be that this is a process the school should not be performing at all.

Taking advantage recognises uncertainty attached to risk sometimes offers opportunities as well as threats.

Links to other policies and guidance

Policies

There are several complementary policies related to the risk management policy, including, but not exclusively, the policies for:

- FHHS - Health and Safety Policy
- FHHS - First Aid Policy
- FHHS - The administration of medication Policy
- FHHS - Safeguarding and Child Protection Policy
- FHHS - Educational Visits Risk Assessments

Guidance

<https://www.hse.gov.uk/simple-health-safety/risk/index.htm>

Appendix 1 – Risk Management Register

FHHS – Risk Management Assessment & Review– 2023-2024									
									
Risk Assessment Guidelines									
Levels of Risk Refer to the FHHS – Risk Management Policy, page 9									
Risk Management level 1 – management and staff who own and manage risk on a day-to-day basis. Risk Management level 2 – the School Board who oversee the effectiveness of the risk management framework. Risk Management level 3 – the internal scrutiny function which provides independent assurance on the overall effectiveness of risk management and controls. Risk Management level 4 – assurance from external independent bodies such as the external auditors and other external bodies.									
Calculating Levels of Risk – likelihood x impact Refer to the FHHS – Risk Management Policy, page 10									
Likelihood	Impact								
1. extremely unlikely; rare occurrence 2. unlikely 3. moderately unlikely 4. likely; regular occurrence if not actively monitored and mitigated 5. highly likely 6. extremely likely; frequent occurrence	1. not critical to continued operations, teaching and learning 2. minor impact in limited areas 3. minor impact in many areas 4. significant impact; would not affect operations in short term but might in long term 5. significant impact; in medium term; relates to substantial operational areas 6. fundamental to continuing operations								
Definition for Levels of Risk – considering levels after control measures are applied Refer to the FHHS – Risk Management Policy, page 11									
Acceptable Risk 1 to 10	Risks which are managed as part of the day to day running of the school								
Low Risk 11 to 15	Risks which need to be actively monitored and mitigated in order to achieve best practice.								
Medium Risk 16 to 24	Risks which require intervention from key staff and are monitored by Senior staff reporting to the Headteacher.								
High Risk 25 or above	Risks which require reporting to the School Board and which most likely will result in intervention of a high level or the decision to terminate the risk								
Principal Risks or Uncertainties Refer to the FHHS – Risk Management Policy, page 15									
FO	Finance and Operations – including funding and liabilities; culture, strategy, resource allocation, capital strategy, growth and capacity								
HQE	High Quality and Inclusive Education – including Curriculum (Intent, Implementation, Impact); progress towards EHCP outcomes; academic progress from starting point; Preparation for Adulthood including routes to qualifications; School Improvement; Culture; Curriculum; Pupil outcomes; Accessible to all; Inclusive pastoral support; Behaviour and attendance; Destinations; Collaboration								
Rep	Reputation - reputational risks, including safeguarding; including high level risks from Potential pupils								
L&G	Leadership and Governance – the accountability and responsibility of the School Board and the Senior Leadership Team of the school; Workload, Retention, Working environment, ECTs, CPD, Career Progression, EDI, Safer Recruitment								
EM	Estate Management - including health and safety, capital and maintenance								
SF	School Force - recruitment and retention principles, including safer recruitment and staff development								
<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;">Risk Management Assessment complete by</td> <td style="width: 40%;">Date</td> </tr> <tr> <td>Risk Management Assessment reviewed and approved by</td> <td>Date</td> </tr> <tr> <td>Review of Risk Assessment planned for Note this Risk Assessment may be reviewed earlier if levels of risk change</td> <td>Date</td> </tr> <tr> <td> </td> <td> </td> </tr> </table>		Risk Management Assessment complete by	Date	Risk Management Assessment reviewed and approved by	Date	Review of Risk Assessment planned for Note this Risk Assessment may be reviewed earlier if levels of risk change	Date		
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Strategic Aim 1						ISS
Ensuring that the pupils are safe and feel safe and valued by supporting and safeguarding their personal and social development, behaviour, health and well-being						Parts 1, 2,3
Potential Risk or Uncertainty	Risk / Uncertainty Type	Likelihood X Impact gross risk score	Success Criteria Control Measure	Likelihood X Impact net risk score	Risk Owner	Review & Actions

Strategic Aim 2						ISS
Providing an outstanding high quality and inclusive education, with a therapeutic approach to teaching and learning, access to a range of therapies and classroom support, deploying the best staff where they are needed most of all						Parts 1, 2,3
Potential Risk or Uncertainty	Risk / Uncertainty Type	Likelihood X Impact gross risk score	Success Criteria Control Measure	Likelihood X Impact net risk score	Risk Owner	Review & Actions

Strategic Aim 3						ISS
Ensuring high quality stewardship of the premises, including health and safety, and the School's statutory responsibilities, to deliver the best educational environment and facilities for children and staff						Parts 3, 4, 5
Potential Risk or Uncertainty	Risk / Uncertainty Type	Likelihood X Impact gross risk score	Success Criteria Control Measure	Likelihood X Impact net risk score	Risk Owner	Review & Actions

Strategic Aim 4						ISS
Providing a strong infrastructure, support and accountability framework underpinned by effective financial and risk management that supports the provision of high-quality education						Parts 3, 4, 5
Potential Risk or Uncertainty	Risk / Uncertainty Type	Likelihood X Impact gross risk score	Success Criteria Control Measure	Likelihood X Impact net risk score	Risk Owner	Review & Actions

Strategic Aim 5						ISS
Providing strong strategic leadership and governance to oversee the management of staff and manage the day-to-day operation; oversee overall School effectiveness and quality assure its work and outcomes in line with the ISS						Parts 6, 7, 8
Potential Risk or Uncertainty	Risk / Uncertainty Type	Likelihood X Impact gross risk score	Success Criteria Control Measure	Likelihood X Impact net risk score	Risk Owner	Review & Actions