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# **Queen Elizabeth's School**

## **RISK MANAGEMENT POLICY**

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### **1. Features of Risk Management**

At Queen Elizabeth's School, risk management is an important feature of both daily operations and the strategic oversight of the organisation. The approach to risk is to strike the balance between maximising the educational opportunities available to pupils (to fulfil the objects of the School), whilst protecting against losses with respect to welfare, financial sustainability, data security, reputation and the like. This policy aims not to set out all the particular risks identified and their mitigations – such details are to be found in the risk register and risk assessments – but rather to outline the School's risk management framework.

This risk framework takes account of the core principles of risk management:

- Identification;
- Measurement;
- Management;
- Monitoring; and
- Reporting

The School's approach has been informed by the evolving requirements of the ESFA and Academies Financial Handbook, as well as the recommendations of the School's external auditors.

Risk management at the School is delivered through a variety of methods, at multiple tiers of governance, but includes:

- Staff and governor training;
- School policies and procedures;
- Risk assessments and action plans;
- The risk register;
- Internal scrutiny, including independent critical friend reviews and governors' reviews;
- External audit.

### **2. Risk profile**

Queen Elizabeth's is an academically-selective state-funded secondary school, educating almost 1300 boys aged 11-18 who travel from across the North London and Hertfordshire regions. The School is an academy, having converted in 2010 under the offer to those schools rated 'outstanding' by Ofsted. The School has a national reputation for academic excellence and for the university destinations of its leavers. There is also much importance placed on extra-curricular enrichments, with pupils provided opportunities to participate in a wide variety of activities and off-site trips. This includes a full programme of competitive sporting fixtures, inter-School competitions in activities such as debating, chess and robotics, as well as opportunities for residential trips within the UK and abroad.

Risks associated with the curriculum and enrichment offer are mitigated to the degree that the benefits of conducting the activity outweigh the risks. For example, the educational benefits of conducting a science experiment against the risk of injury after safety measures have been implemented. Risks can rarely be totally eliminated, as doing so would prevent many worthwhile activities from taking place at all (damaging the educational prospects and life

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chances of pupils) or be prohibitively expensive. This is acknowledged by the ESFA's guidance for academy trusts on risk management.

Risk management takes full account of the statutory duties upon the School, however, such as those relating to health and safety, data protection and financial probity. There is generally a risk-averse attitude to operational risks, with management processes embedded across the organisation to prevent such risks from materialising wherever possible.

Safeguarding is a critical area of the School's operations, with strict measures in place for the identification and mitigation of risk. Strategies such as safer recruitment, staff training, staff and pupil conduct policies, information security procedures, appropriate governance and assurance, and multi-agency partnerships, create an environment in which there is particularly low tolerance of safeguarding risks. Any safeguarding issues which arise are acted on immediately.

The School's status as a state-funded academy presents a degree of both financial security and risk. The School does not have the challenge of needing to raise most of its income annually, but there is ongoing risk that grant funding may fall short of rising costs, and that funding and governance requirements are subject to changes in government policy. Funding pressures still pose challenges to financial sustainability, but the measured risk is lower than many comparable settings. School leaders are duly cognisant of the need to use public money prudently and to uphold the highest standards of probity. Some School development priorities, such as the enhancement of the estate, rely upon, and benefit from, additional financial support from the Friends of Queen Elizabeth's. Donation funding to the charity is stable and relatively predictable, but cannot be guaranteed.

The School is highly oversubscribed and thus able to effectively implement its meritocratic admissions policy. This contributes to the high academic performance for which the School is known and makes viable its position in the educational landscape. With no catchment area, the School is less impacted by local demographic changes.

The strategic position of the School has been enabled by bold decision making over the last three decades. The School continues to balance risk and reward, whilst being cautious not to undermine its ability to meet the needs of present pupils. This constitutes a risk-aware approach at the level of senior leaders and governors.

### **3. Roles and responsibilities**

#### Members of the Academy

- Receive the annual audited accounts and annual report, once approved by the Governing Body (the trustees);
- Appoint the external auditors for the forthcoming year;
- Have oversight to ensure that the School is meeting its objects, receiving information on the educational outcomes achieved by pupils (results and progress);
- Review the collective effectiveness of the Governing Body with respect to the governance of the School, including asking questions of governance and executive leaders where needed;
- Are presented with the School's priorities for development and seek to maintain the long-term interests of the School.

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### The Governing Body

- Sets the strategic direction of the School, including its overall attitude to, and tolerance of, risk;
- Establishes the School's missions and priorities for development;
- Establishes the risk management policy, as well as the other School policies which deal with areas of potential risk;
- Models the conduct set out in these policies, upholding the highest standards of probity and integrity;
- Establishes sub-committees, which focus on particular areas of the School's operations and which all have a role in managing risk, whilst retaining at, full Governing Body level, purview across matters of risk;
- Receives regular reports from committees, link governors, and senior staff as part of the programme of internal assurance;
- Commissions, via senior leaders, independent critical friend reviews of areas of the School's provision (for example an academic department, or an operational area such as safeguarding), and receives the feedback from these reviews;
- Receives a risk management report at each meeting;
- Receives an annual internal scrutiny report, summarising the programme of internal assurance;
- Sets the annual budget;
- Receives the academy accounts at least six times each year for scrutiny;
- Receives, for review, approval and adoption, the annual audited accounts and annual report;
- Receives the full risk register at least annually, with high scores considered at each termly meeting.

### Governing Body sub-committees

- The Finance, Audit & Risk (FAR) Committee has particular focus on risk management across the School's operations;
- FAR establishes the risk register and regularly considers the effectiveness of the register in documenting and managing risks, as well as conducting an annual review of risk management arrangements;
- FAR scrutinises the risk register at each meeting, with focus areas (thematically linked areas of risk) being given particular attention, on a revolving basis, alongside a review of high scores and risk rating changes;
- FAR considers progress made against mitigating risk at each meeting, measuring against targets for particular risks where established;
- FAR prepares the annual internal scrutiny report and maintains an overview of the future planned internal assurance programme;
- FAR scrutinises the School's finances and budgetary position, reporting to the full Governing Body and recommending the budget;
- FAR liaises closely with the appointed external auditors throughout the audit process;
- The Child Protection, Safeguarding & Wellbeing Committee monitors safeguarding and pastoral care, and conducts the annual governors' review of safeguarding – reporting into the full Governing Body;
- The Estates Committee has oversight of the School's estates strategy and monitors progress with major capital works, providing assurance with respect to these large contracts;

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- The Admissions Committee oversees the admissions process, ensuring the School is compliant with the Schools Admissions Code and that admission is conducted fairly and openly – seeking to reduce the risk of successful appeal;
- The Discipline Committee and Staff Committee are ad hoc panels which are convened where there is a serious disciplinary case to hear and ensure that cases are heard fairly and objectively, serving to reduce the risk of pupils or staff being unfairly treated or, conversely, being allowed to continue to pose a risk to others in the School community;
- The executive Health & Safety Committee provides internal assurance with respect to these matters, whilst undertaking whole-school risk assessments and action plans (including in relation to new and emerging risks) and commissioning the statutory health and safety checks required;
- The Health & Safety Committee reports into the full Governing Body at each meeting.

### Headmaster and senior staff

- The Headmaster manages the implementation of the governors' policies and the risk mitigation measures set out;
- The Headmaster has responsibility for responding to risks as they arise from day to day, with the support of colleagues, including dealing with emergencies;
- The Headmaster is the Accounting Officer;
- The Headmaster appoints the Designated Safeguarding Lead and their deputies;
- The Headmaster ensures that roles are filled by suitably skilled staff and that appropriate training and support is provided;
- The Headmaster ensures that safer recruitment procedures are followed and that DBS checks are conducted for staff, contractors and volunteers in line with legislation and School policies;
- The Headmaster ensures that health and safety legislation is complied with;
- The Headmaster and senior colleagues conduct business continuity planning to mitigate against potential losses should a risk materialise;
- The Headmaster and Deputy Head (Operations) actively manage contracts with third parties, such as for catering, cleaning, grounds and school transport, as well as contractors for site works, to ensure that these are operating effectively;
- Senior staff ensure that the risks associated with activities in their management area have been considered and that the appropriate risk assessments are in place;
- As managers, staff ensure that those they manage are following School policies and procedures and raise non-compliance should they identify this;
- Senior staff are involved in approving higher risk activities, such as School trips (for which there is an Educational Visits Co-ordinator), and follow established processes for doing so.

### Staff

- Have a responsibility to follow the policies and procedures set by the Governing Body and senior leadership;
- Seek to ensure that pupils follow School policies and rules in their conduct and challenge behaviour contrary to these, particularly where this behaviour is likely to increase risks to the pupil or others;
- Should be thorough when asked to assess risk within their subject area and think carefully about how risks can be further mitigated;

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- Should raise concerns they have about potential risks with their line managers or senior managers;
- Can utilise the provisions of the School's Whistleblowing Policy to raise serious issues without fear of negative impact;
- In the event of an incident, where the realisation of a risk leads to, or could have led to, a damaging loss, report this fully and openly to senior staff.

#### **4. Training**

In the school environment, risks are constantly being assessed in real time and responded to. From the relatively frequent assessments such as whether it should be a wet break, or if discarded bags are causing a hazard in a corridor, or whether a particular website is an age-appropriate learning resource, to rarer but immediate threats such as whether a pupil is posing a safety risk in how they are approaching a task in a PE lesson, or a Food Technology class, or whether an IT security warning is genuine or a phishing attack, staff are required to make calculations of risk on a daily basis.

In making these judgements staff are informed both by the overall culture of risk management and by training. Upon joining the School, all members of staff conduct certified training in:

- Safeguarding (including child protection and Prevent);
- Allergies and Anaphylaxis;
- Health and Safety;
- Fire Awareness; and
- GDPR Essentials (data protection).

Other such modules (completed relevant to job role) include:

- Cyber Security Awareness;
- GDPR Advanced;
- Fraud Prevention;
- Display Screen Equipment.

Training is refreshed regularly, for example on an annual basis for safeguarding, and reinforced by INSET programmes.

This is addition to the full induction and training programme for teaching staff, with further support for those undertaking initial teacher training and newly-qualified teachers (NQTs). This training aids staff in implementing the School's approach to managing risk, such as with regards to behaviour management, assessment for learning, or financial processes for budget holders.

Staff are also supported to learn to use School systems securely and effectively, such as information management systems (which contain lots of sensitive personal data), online conferencing technologies (used for remote learning) and finance systems.

There is a culture of continuous professional development, in which staff are encouraged and supported to develop new and enhanced skills and to exchange ideas and challenges with others in the education sector (for example via the Prince's Teaching Institute, or BASS Group), in order to gain insight and examples of best practice.

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Training opportunities are also made available to governors and members (for example in partnership with the National Governors' Association) to support them in executing their crucial leadership role.

### **5. School policies and procedures**

School policies and procedures also play a significant role in managing risks, establishing the culture of the School with respect to various areas of potential risk, as well as guiding staff and pupils in how to respond.

By making clear the School's expectations and methods, policies help people to act more consistently and predictably, thus reducing the likelihood of many risks from materialising. Policies also routinely set out how a negative situation (everything from an injury, to a data breach, or a case of peer-on-peer abuse) would be handled – assisting those involved to minimise the loss or impact.

The School's policies and procedures are set by the Governing Body and are informed by relevant legislation and government guidance. A number of policies are also guided by independent legal advice, particularly with respect to processes against which there could potentially be legal challenge (such as a disciplinary procedure, or matters relating to employment rights).

Adherence to policies and procedures therefore ensures coherence with the overall strategic direction of the School and gives the best chance of appropriately managing a risk.

All policies are relevant to risk management, but the following are particularly central to the School's risk management framework:

- Anti-Fraud Policy
- Code of Conduct for Staff and Governors;
- Data Protection Policy;
- Educational Visits Policy;
- Equal Opportunities Policy;
- Financial Procedures;
- Health and Safety Policy;
- Information and Communication Technology Policy;
- Pupil Discipline Policy;
- Safeguarding Policy;
- Whistleblowing Policy.

The content of these policies serves as mitigation against a plethora of, often quite serious, risks. The process of formulating, reviewing and revising the School's policies and procedures also provides a useful opportunity for reflection upon the nature of risk and how this evolves over time. Where there are statutory requirements upon the regularity of review – such as annual review of the Safeguarding Policy – these are followed, with a rolling programme of review for other policies.

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### 6. Risk assessment

Whilst risk-based decisions are necessary on a daily basis, formal risk assessment is an important tool for identifying and measuring risks.

The format of a risk assessment will depend upon the nature, scale and risk profile of a proposed activity or risk area; but there are common questions that would normally be considered. These include:

- What is the proposed activity or decision?
- What risks does this potentially produce?
- Who would be impacted a particular risk?
- What is the likelihood of that risk materialising?
- What would be the impact if that risk did materialise?
- What mitigation measures are planned to manage the risk?
- What is the effect of the mitigation measures on the likelihood and impact of that risk materialising?
- Is the level of risk tolerable?

Likelihood and impact (severity) are often graded (from negligible to certain or critical – or approximate synonyms thereof) or scored (e.g. 1-5), with the two multiplied to estimate the overall risk level. This process may be conducted prior to mitigation and then again afterwards, factoring in these measures (and showing their effect upon the risk level), or just after mitigation has been considered, as this is the basis on which the activity or decision would proceed if agreed.

Where additional actions are needed to implement the mitigation measures, or to further reduce the risk level, these should be noted. Where a risk assessment identifies a large number of risks, or risks with a particularly high rating, it may be helpful to formulate an action plan to address these issues.

There is not a prescribed format or template across the School, with some flexibility afforded for the most appropriate format to be found. Templates - for example from sector organisations (such as CLEAPSS for Science and Technology), the Department for Education, or local authorities – can be useful and give some assurance. For illustration, the School drew upon templates provided by the London Borough of Barnet with respect to Covid-19 safety (having been developed by health and safety professionals and in consultation with unions).

Written risk assessments take place at various scales within the School. These include:

- For a single educational event or trip – submitted to the Educational Visits Co-ordinator (Assistant Head, Pupil Involvement), as per the Educational Visits Policy;
- At departmental level – held and managed by the Head of Subject and made available for internal audit, such as to the Health and Safety Committee (or an external auditor) for departments such as Science, Technology and PE/Games;
- For the whole School – conducted centrally by senior staff or external specialists (for example covering health and safety areas like fire safety, water quality or a public health situation).

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Risk assessments are regularly reviewed and are updated when there are changes material to the level of risk.

Statutory risk assessments are scheduled to meet or exceed regulatory requirements, such as the annual fire risk assessment. These must be conducted by a competent person and, as such, are commissioned externally where specialist knowledge or certification are required.

Risk assessment feeds clearly into the School's overall Risk Register, which draws out the key risks to the organisation.

### **7. Risk Register**

In line with the requirements of the ESFA, the School has instituted a formal Risk Register. This presents the main risks across the organisation and is a live and dynamic document, being kept under regular review and update.

The Risk Register is a useful strategic tool for identifying risks, codifying mitigations, measuring their impact and monitoring progress over time. By co-locating risks from different areas of the School's operations, it can help identify broader strategies for managing risk.

The Risk Register has the following features:

- Grouping of individual risks into thematic risk categories and then into further sub-categories;
- A description of the specific risk;
- Risk scoring (1-5) of the pre-mitigation risks in terms of likelihood and impact (multiplied to determine the total risk score), and movement in risk rating;
- A narrative commentary on control features and targeted actions aimed at reducing the risk;
- A residual assessment of risk post-mitigation and revised total risk score; and
- Identification of the risk owner and date for next review.

The register also includes business continuity planning, as required by the ESFA.

The full register is presented to the Governing Body annually. At the other termly meetings of the Governing Body a shorter report highlighting the high-rated risks (those with high total risk scores) is provided for scrutiny.

The Risk Register is a standing item on the agenda of the Finance, Audit & Risk Committee, with detailed focus on high scores, changes in risk, and, on a rolling basis, different risk categories. The committee also reviews the effectiveness of the Risk Register at least annually.

### **8. Internal assurance**

The Risk Register is a critical resource with respect to the School's internal assurance, allowing for the regular monitoring of risks, the impact of mitigation, and progress against further risk reduction.

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Internal assurance is conducted in many ways across the range of the School's activities and this network of assurance plays an important role in the overall risk management framework.

An annual internal scrutiny summary report is presented to the Governing Body.

A significant part of this assurance programme is delivered through the commissioning, by the Governing Body, of independent peer reviews. For example:

- The use of consultants (often via ISI Consultancy) to conduct independent critical friend reviews of academic departments. Every subject can expect to have one such 'deep dive' review in each four-year cycle. Consultants carry out a thorough assessment of the subject/department's provision and make clear quality judgements against agreed criteria. The findings of these reviews, including actions for development, are reported through to the full Governing Body.
- Similar periodic reviews are commissioned for other aspects of the School's provision – recent examples including Safeguarding, Health & Safety, Governance, and Risk Management – a number of which include a review of the role of governors.

These reviews provide powerful independent assurance of the quality of the School's provision – being conducted by suitably qualified and experienced experts. The process enables the identification of additional risk factors and drives continual improvement. Recommendations are addressed through area work streams.

External support with assurance is also commissioned in other specific areas. For example:

- Regular reviews of the School's Single Central Record by the London Borough of Barnet's Schools Safeguarding lead;
- The use of consultants to support contract monitoring in areas such as catering and cleaning, as well as in supporting the project management of large-scale construction projects;
- Engaging professional expertise with respect to compliance risks, such as legal advice and services.

In such cases, senior staff are also directly involved in that assurance process and conduct interim checks internally.

Thematic internal audit reviews are also conducted, considering particular risk areas. For example, an organisation-wide review of data protection in relation to GDPR, or a focus on pupil literacy skills across all subjects and year groups. Such reviews aid the identification of risk and the measurement of risk, but crucially also help the development of mitigation strategies.

A number of the regular reviews are conducted by governors directly. These include, as examples:

- The Governors' Annual Review of Safeguarding, conducted by the Child Protection, Safeguarding and Wellbeing Committee. The committee, led by the Named Safeguarding Governor, scrutinise the work of the Designated Safeguarding Lead and his team, analysing caseloads, case studies, updates to policy and practice and planned developments to safeguarding measures. The committee then completes a compliance check and presents summative information to the full Governing Body.

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- The Annual SEND Review, conducted by the link governor. This scrutinises the provision and support available to those with special educational needs and disabilities and the work of the SENCo, analysing caseload, case studies and pupil outcomes.

There are also annual update reports for governors on matters such as equalities (and progress against the School's equality objectives), accessibility, and support for the pupil premium cohort. Termly reports are delivered by the Deputy Heads on academic, pastoral and operational matters, including safeguarding and health and safety.

This is in addition to the assurance role of Governing Body sub-committees referred to in the roles and responsibilities section of this policy.

Internal assurance is also embedded into the daily management operations of the School. For example:

- Lesson observations and learning walks;
- Senior staff reviews of learning;
- Progress and attainment data analysis and RAG rating of whether pupils are on track to meet their personal target levels;
- Site walks (regarding health and safety, and site improvement works); and
- Compliance checks;
- Staff performance management.

The internal assurance programme is designed to both check that risks are being effectively managed and to identify action points for further improvement to provision. Internal assurance seeks to build well-founded confidence that the School would have a positive outcome in formal external reviews such as an Ofsted inspection or the annual audit process.

### 9. External audit

External audit refers to statutory audit processes. Where the School has chosen to appoint independent experts to conduct reviews, this constitutes part of the internal assurance programme.

External audit presents a last line of defence against major financial and organisational risks. There is a legal duty for the School to appoint external auditors each year. The audit cycle, once begun, is managed by the Finance, Audit & Risk Committee. All governors and staff are committed to engaging openly, honestly and fully with the auditors.

The audit seeks to ensure there are no irregularities in the finances of the School and that School is fulfilling its legal obligations under the Academies Financial Handbook and other statutory guidance.

The findings of the audit process are reported to governors and the auditors must sign-off on the annual accounts and report before these can be approved by the full Governing Body for submission.

Any compliance problems identified by the audit would be immediately investigated and action taken to redress them. Non-binding recommendations of the external auditors would always be carefully considered as an opportunity for further risk mitigation.

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Other forms of external audit may include inspection by bodies such as Ofsted or the Health & Safety Executive, or statutory checks such as the annual Fire Risk Assessment. A negative outcome from such an inspection is a risk to all schools and the risk management framework seeks to minimise this risk. However, these forms of external audit would also assist in the identification and management of risk thereafter.

### 10. Review

Whilst approved by the full Governing Body, this policy will form part of the annual review of risk management measures undertaken by the Finance, Audit & Risk Committee.

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*LINKED  
POLICIES*

- Anti-Fraud Policy
  - Code of Conduct for Staff and Governors
  - Data Protection Policy
  - Educational Visits Policy
  - Equal Opportunities Policy
  - Financial Procedures
  - Health and Safety Policy
  - Information and Communication Technology Policy
  - Pupil Discipline Policy
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  - Whistleblowing Policy
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Approved by the Governing Body on 25 February 2021

Signed .....

B.R. Martin, Chairman of the Governing Body