[NAME OF SCHOOL] RISK REGISTER

(Reviewed [DATE])

RISK MANAGEMENT POLICY

- 1. The Trustees of MIST are aware that the Charities (Accounts and Reports) Regulations 2008 (2the Regulations") sets out the required form and content of the trustees' annual report and the scrutiny and accounting arrangements for charities. They also understand that the Regulations made the Statement of Recommended Practice ("SORP") recommendations that the trustees' annual report should contain a risk management statement a statutory requirement for certain charities.
- 2. The Charities Commission has issued guidance on Charities and Risk Management (CC26) and the detailed guidance can be accessed via the following link:

https://www.gov.uk/government/publications/charities-and-risk-management-cc26/charities-and-risk-management-cc26

- 3. Within MIST, detailed consideration of risk is the responsibility of the MIST Audit Committee, assisted by input from the Trust's Executive Officers. The Executive Officers identify, assess and control risks throughout the year and produce an annual Risk Register for consideration, together with the annual audited accounts, at the February Audit Committee Meeting. The Audit Committee reviews both the Risk Register prepared for MIST Head Office and a summary of the Risk Registers prepared by the Schools and submitted as part of the Annual School Report. The MIST Audit Committee reports on the group's risk framework to the MIST Trustees at their March meeting.
- 4. In accordance with the Governance Manual, MIST Trustees delegate the responsibility for risk management in the Schools to the School Governors. The School's Governors are responsible for the initial identification of the risks with the support of the SLT. It is expected that these would take into account the School's strategic objectives. Following that identification of the risks, the School's [Finance/Audit Committee or equivalent] takes responsibility for detailed assessment of risk at the School, and is assisted in this responsibility by input from the School's Senior Leadership Team.
- 5. The key controls used by the [Finance/Audit Committee or equivalent] and Board of Governors should include:
 - a. Formal agendas for all Committee and Board activity;
 - b. Detailed terms of reference for all Committees;
 - c. Comprehensive strategic planning, budgeting and management accounting;
 - d. Established organisational structure and lines of reporting;
 - e. Formal written policies on all aspects of activity;
 - f. Clear authorisation and approval levels for financial expenditure; and
 - g. Vetting procedures as required by law for the protection of the vulnerable.
- 6. The Risk Register analyses:
 - a. The financial procedures and controls
 - b. The major risks to the School, including:

- * Strategic risk
- * Loss of fee income
- * Damage to reputation
- * Failure to teach the current syllabus
- * Risk of a child protection issue
- * Gaps in Governor skills
- * Conflict of interest
- * Employment disputes
- * Major health and safety issues
- * Possible data loss
- * Risk of fire, flood and land slip
- * Poor cash flow management
- * Fraud
- * Loss through inappropriate investments
- c. The measures used to protect the School against such risks, including:
 - * Safer recruitment of staff, Governors and volunteers
 - * Measures to ensure the selection, training and appraisal of appropriately qualified staff and Governors
 - Insurance
 - * Strong financial controls that are regularly reviewed
 - * Financial reserves policy
 - * Use of professional advice from such professionals as lawyers, accountants, Health and Safety consultants and architects as required
 - * Formal review of compliance with the School's charitable objectives
- 7. The Board of Governors is required to approve the Risk Register annually (as a minimum) and to endorse its submission to MIST as part of the Annual School Report.

[NAME OF SCHOOL] RISK ASSESSMENT AND MANAGEMENT PROCESS

The Governors use a 4-stage approach to the risk assessment and management process, as follows:



Risks are identified by considering key aspects of the School, focusing initially on factors that are significant in the achievement of the School's overall aims and objectives. Governors and SLT will draw on their knowledge of the School and external factors to draw together a list of risks faced by the School. This can be expected to change over time and the list initially identified should be reviewed on a regular basis to ensure that it remains up to date.

Risk Assessment

The results of risk identification are assessed in terms of likelihood and impact. Each of these factors is scored from 1 to 5, with 5 being the most severe, as follows:

		Impact			Likelihood
1	Insignificant	No impact on service or finances No impact on reputation Complaint unlikely Litigation risk remote	1	Remote	May only occur in exceptional circumstances
2	Minor	Slight impact on service or finances Slight impact on reputation Complaint possible Litigation possible	2	Unlikely	Expected to occur in a few circumstances
3	Moderate	Some service disruption Some impact on finances Potential for adverse publicity (avoidable with careful handling) Complaint probable Litigation Probable	3	Possible	Expected to occur in some circumstances
4	Major	Service disrupted Major Impact on finances Adverse publicity not avoidable (local media) Complaint probable Litigation Probable	4	Probable	Expected to occur in many circumstances
5	Extreme/ Catastrophic	Service interrupted for significant time Severe impact on finances Major adverse publicity not avoidable (national media) Major litigation expected Resignation of senior management and board Loss of beneficiary confidence	5	Highly Probable	Expected to occur frequently and in most circumstances

These are then multiplied together to provide an overall risk score, as set out in the table below.

	RISK SCORE												
I	Extreme/Catastrophic	5	5	10	15	20	25						
M	Major	4	4	8	12	16	20						
P	Moderate	3	3	6	9	12	15						
A	Minor	2	2	4	6	8	10						
C	Insignificant	1	1	2	3	4	5						
T	-		1	2	3	4	5						
			Remote	Unlikely	Possible	Probable	Highly						
				_			Probable						
			LIKELIHOOD										

Key:

Risk Score	Risk Severity
1-6	Minor or insignificant risk
8-12	Moderate risk
15 -25	Extreme or catastrophic
	risk

Risk Mitigation

Once identified and assessed; risks will be considered by the Governors, assisted by input from the SLT, according to priority. The Governors will decide how each risk should be dealt with, as follows:

	Mitigating Risks
Reduce the risk	Establish controls to reduce either the impact or the likelihood of the risk
Avoid the risk	Do not carry out the activity
Transfer the risk	Insure or outsource the activity
Accept the risk	If a risk cannot be reduced avoided or transferred, then accept the risk, but prepare for the impact

Movement in Risk

Under 'Monitoring and Trend', the arrows indicate whether there is an increasing risk, which is demonstrated by the arrow either at 45 degrees upwards **7** or vertically upwards **↑** for a serious increase in risk. A reduction in the risk is demonstrated by the arrow either at 45 degrees downwards **3** or a considerable reduction is shown by the arrow pointing straight downwards **4**. A horizontal arrow would indicate that there is little change in that risk **3**.

RISK REGISTER

The Risk Register is compiled under the following headings:

- 1. Governance
- 2. Management
- 3. Regulatory
- 4. Financial
- 5. Operational
- 6. Academic
- 7. Environmental
- 8. Personnel
- 9. External

Note: Whilst the above headings are not expected to be varied by Schools, the content within each heading will be unique to each School and must be considered very carefully by each School and completed to reflect their specific circumstances. What follows on pages 7-16 is an example only and must be developed for each School separately.

TIMING OF THE RISK REGISTER

Whilst MIST only requires a copy of the Risk Register annually to accompany the Annual School Report, the Risk Register should be a living tool used actively by management within the School. Best practice would therefore be for the Risk Register to be updated termly by management to ensure that any adverse changes can be acted upon quickly and mitigation put in place. Governors will review the Risk Register at least annually as part of their governance responsibilities.

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
			•	1. GOVERNANCE			
1.1	Lack of vision or strategic direction	* The School drifts with no clear objectives, priorities or plans. * Issues are addressed piecemeal with no strategic reference. * Financial difficulties. * Loss of reputation. * Shortfall in pupil numbers. * Charitable objectives are not met. * The sustainability of the School is in jeopardy.	5/2	Reduce the Risk * The School is developing the next iteration of a 5 year Development Plan. * The Strategic Plan will be underpinned by several supporting strategies. * 5 year financial forecasts are regularly reviewed.	10	→	Chair of Governors
1.2	Lack of an adequate business or operational development plan	* The School drifts with no clear objectives, priorities or plans. * Issues are addressed piecemeal with no strategic reference. * Financial management difficulties. * Loss of reputation. * Shortfall in pupil numbers. * Charitable objectives are not met. * The sustainability of the School is in jeopardy.	4/3	Reduce the Risk * MIST sets out clear annual objectives for the School. * The School has a 5 year Development Plan. * 5 year financial forecasts are regularly reviewed. * Monthly Budget Meeting. *Adhering to the Group Reserves policy.	12	ע	Head Bursar
1.3	Governors lack relevant skills or terms of reference	* Board fails to meet its purpose.	4/1	Reduce the Risk *Development of a Governors' Skills Matrix * Composition of Board designed to ensure relevant skills. * Robust Governor recruitment and induction. * Terms of reference issued for all committees.	4	ע	Chair of Governors Chair Nominations Committee Head
1.4	Conflict of Interest	* Decisions might not be based on relevant considerations. * Private benefit.	2/1	Reduce the Risk * Conflict of interest policy is in place.	2	n n	Head Bursar

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
1.5	Ineffective organisational structure	* Lack of information flow and poor decision making. * Uncertainty as to roles and duties. * Decisions made at inappropriate level. * Excessive bureaucracy.	4/1	Reduce the Risk * Clear chain of command is in place from MIST to Chair to Head and within the Governing Body.	4	→	Chair of Governors
1.6	Activities potentially outside charitable objectives	* Potential breach of Charity Act.	4/1	Reduce the Risk * Trading activities are dealt with at arm's length through the School's Enterprise Company.	4	→	Bursar
1.7	Poor relationship between MIST, Governing Body and School	* Breakdown in trust and understanding. * All parties become unreceptive to advice. * Strategic tension and lack of a shared mission.	4/2	Reduce the Risk * Governors in School weeks. *Good working relationship between Governors, Head and Bursar. * Bursar meets MIST management team biannually.	8	→	Chair of Governors Head Bursar
1.8	Inadequate reporting to Governors	* Inadequate information resulting in ill-informed decision-making. * Governors become unable to fulfil their monitoring and control functions. * Governors become remote and ill-informed. * Confusion and lack of strategic direction.	4/2	Reduce the Risk * All Board and sub-Committee papers are circulated to all Governors and include detailed written reports by the Head, Bursar and Bursar. * Governors receive regular briefings from staff. * Chairman meets members of Staff Association committee periodically. * Some Governors have specific roles taking a particular responsibility in, for instance, child protection, property, Health and Safety and pastoral aspects.	8	→	Head Bursar
1.9	Inadequate recording of Governors decisions	* Ambiguity of decisions. * Confusion. * Breakdown of trust.	3/1	Reduce the Risk * Written minutes of all Governors' meetings are circulated. * Decisions and actions are included and a consolidated list is provided for Board meetings.	4	→	Bursar
1.10	Dominance of Governors by an individual	* Board cannot operate effectively. * Culture of secrecy or deference. * Arbitrary over-riding of control mechanisms. * Lowering of morale and motivation.	2/1	Reduce the Risk * Clear terms of reference are issued to Governors. * All Governors have equal voting rights. * Governors' meetings have a culture of frankness and transparency.	2	→	Chair of Governors

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
1.11	Inadequate performance by a Governor	* Board cannot operate effectively. * Increased burden on other Governors. * Lowering of morale and motivation.	2/2	Reduce the Risk * MIST monitors the performance of the Chairman. * Chairman monitors the performance of the other Governors.	4	→	Chair of Governors

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
				2. MANAGEMENT			
2.1	SLT members lack relevant skills	* SLT is not fully effective. * The planning process is not comprehensive or robust. * Key objectives are not met.	3/2	Reduce the Risk * Composition of SLT is designed to ensure appropriate breadth of expertise. * The Head regularly reviews the skills necessary of the team.	6	→	Head
2.2	Inadequate performance by a member of SLT or other key individual	* Key objectives are not met. * Overall performance of School declines. * SLT is not fully effective.	3/2	Reduce the Risk * Performance of SLT and other key individuals is monitored by Head, Governors and MIST as appropriate.	6	→	Head
2.3	Conflict of Interest by a member of staff	* Decisions might not be based on appropriate considerations. * Private benefit.	2/2	Reduce the Risk * Conflict of interest policy in place. * Annual returns to MIST and auditors. * Financial Regulations.	4	→	Bursar
2.4	Ineffective organisational structure within the School	* Lack of information flow and poor decision making. * Uncertainty as to roles and duties. * Decisions made at inappropriate level. * Excessive bureaucracy.	3/2	Reduce the Risk * Organisational structure comprehensively overhauled. * On-going review of teaching and support staff roles, responsibilities and reporting structure. * Organisational structure monitored by Governing Body.	6	→	Head Bursar
2.5	Inadequate reporting of SLT decisions	* Ambiguity of decisions. * Confusion. * Breakdown of trust.	2/2	Reduce the Risk * Clear leadership shown at SLT meetings. * Minutes are taken of all SLT meetings.	4	→	Head

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
2.6	Child Protection Issue	* Harm to a pupil. * Major impact on School's reputation. * Recruitment and retention issues. * Financial difficulties. * Litigation.	5/2	Reduce the Risk Transfer the Risk * Comprehensive Child Protection policy and procedures are in place. * School follows safer recruitment procedures. * All staff are given regular child protection briefings. * Every child protection issue is followed up diligently. * Monitoring by Governors at all Board meetings. * ISI Inspection. * Legal advice usually sought. * Insurance.	10	→	Chair of Governors Head
				3. REGULATORY			
3.1	Breach of legislation and regulations	* Litigation, fines, penalties or censure. * Loss of licence to undertake a particular activity. * Employee, parent or pupil action for negligence. * Litigation. * Reputational risks.	5/2	Reduce the Risk Transfer the Risk * Key legal and regulatory requirements are identified by audits, ISI inspections, School lawyers, MIST, Governors and SLT. * Responsibility is allocated for key compliance procedures. * Compliance monitoring and reporting is in place. * Comprehensive insurance is in place to cover as many eventualities as possible.	10	→	Head Bursar
				4. FINANCIAL			
4.1	School cannot recruit sufficient full fee boarding/ day pupils	*School needs to undertake cost restructuring *School needs to increase numbers on roll.	3/3	Reduce the Risk * School is successfully compensating by recruiting day/ boarding pupils. * Lettings company established generating additional surpluses. * Implementation of the Marketing & Admissions Supporting Strategy. * Focus on international Tier 4 recruitment. * Cost savings and efficiencies.	9	→	Chair of Governors Head Bursar

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
4.2	Inadequate financial planning and forecasting	* School is unaware of potential or forthcoming financial crises. * Cashflow difficulties.	4/2	Reduce the Risk * Detailed management accounts and 10- year financial forecasts in place. * Forecasts considered by Finance Committee and Full Board at each meeting. * Annual external audit. *5 year financial forecasts are regularly reviewed. * Monthly Budget Meeting. *Adhering to the Group Reserves policy.	8	→	Head Bursar
4.3	Weak financial controls and inadequate monitoring	* School is unaware of potential or forthcoming financial crises. * Uncontrolled expenditure. * Fraud.	3/2	Reduce the Risk Transfer the Risk * Monitored by Finance Committee, and auditors. * Auditors' management letter acted upon by School and monitored by [Audit/Finance Committee]. * School insured against fraud.	6	→	Bursar
4.4	Poor cashflow management	* Temporary cashflow problem resulting in insufficient funds for salaries and bills. * Complete miscalculation of free cash available resulting in inability to fund salaries and bills.	4/2	Reduce the Risk Transfer the Risk * Careful forecasting and management of cashflow takes place. 5 year financial forecasts are regularly reviewed. * Termly Budget Meeting. * Annual and termly cashflow forecasts are produced and monitored by MIST * MIST provides overdraft facility if necessary.	8	→	Bursar
4.5	Inadequate insurance cover	* Losses not adequately covered.	5/3	Reduce the Risk * Insurance policy reviewed annually with independent broker.	15	→	Bursar
4.6	Inadequate payroll process	* Incorrect salary payments. * Incorrect tax or NI deductions. * Fraud.	2/1	* Internal checks and external audits undertaken. * Financial Regulations.	2	→	Bursar
4.7	Inadequate bad debt policy	* Loss of fee income. * Unsustainable levels of debts for parents. * Adverse PR. * Expulsion of pupils. * Cashflow difficulties.	3/2	* Strict debtors' policy in place. * Constant monitoring takes place. * Each case is handled personally. * All debts vigorously pursued. * Write-offs are a last resort.	6	→	Bursar

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
4.8	Cancellation of lettings contracts	* Loss of lettings' income. * Cashflow difficulties.	4/3	Reduce the Risk * Explore greater diversification, thus spreading the risk. * Comprehensive contracts are in place.	12	→	Bursar
				5. OPERATIONAL			
5.1	Health and Safety issue	* Harm to staff, contractors pupils, parents and public. * Litigation. * Legal and compensation costs. * Detrimental to School's reputation. * Problems with recruitment and/or retention. * Closure of School or some facets. * Financial sustainability.	5/2	Reduce the Risk Transfer the Risk * Comprehensive H&S policy is in place, reviewed by Governors on an annual basis. * Risk assessments are undertaken for all potentially hazardous activities. * Regular external H&S audits take place. * H&S action plan. * Accident reporting. * ISI Compliance inspections. * Comprehensive insurance in place.	10	→	Bursar
5.2	Damage to reputation from adverse media coverage of an incident	* Public perception that School is not a well-run organisation. * Problems with recruitment and/or retention.	4/2	Reduce the Risk * Comprehensive and regularly reviewed policies in place. * Crisis Management Plan in place. * Legal advice.	8	→	Head Bursar
5.3	ICT crash, destruction or loss of data	* Pupils and staff cannot access work, records, e-mail or internet. * No access to payroll. * Permanent or temporary loss of work and records. * Litigation over loss of pupils' work.	5/2	Reduce the Risk Transfer the Risk * Robust and reliable back-up systems in place, but still need more resilience. * Insurance against some litigation.	10	→	Bursar
5.4	Fire, flood, explosion or other natural disaster; or terrorism	* Loss of a boarding house. * Loss of a large area of classrooms. * Severe damage to utilities. * Period of complete or partial closure. *Loss of Lettings income, 3G pitch, partner.	5/2	Reduce the Risk Transfer the Risk * Disaster recovery plan in place. * Comprehensive insurance in place including terrorism.	10	→	Bursar
5.5	Major infrastructure failure	* Loss of power, water or heating. * Period of complete or partial closure.	4/3	Reduce the Risk * Preventative maintenance programme in place. * MIST commissioning condition surveys.	12	→	Chair of Governors Head Bursar

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
5.6	Poor catering standards	* Reduction in pupil numbers due to poor quality food. * Food poisoning and/or poor food hygiene leading to closure of kitchens, litigation or damage to reputation.	3/1	Transfer the Risk Reduce the Risk * Catering standards closely monitored and high standards set.	3	→	Bursar
5.7	Poor External Catering Standards for school events	* Reduction in pupil numbers due to poor quality food. * Food poisoning and/or poor food hygiene leading to closure of kitchens, litigation or damage to reputation.	3/2	Transfer the Risk Reduce the Risk * External catering standards closely monitored and high standards set.	6	→	Bursar
5.8	Accident or other emergency during a school trip	* Avoidable injury. * Effect on School's reputation. * Litigation.	2/2	Reduce the Risk * Every trip has a comprehensive movement order which includes a risk assessment. * Reconnaissance trips are undertaken where appropriate * Appropriate staff pupil ratios are met.	4	→	Head
				6. ACADEMIC			
6.1	Failure to teach correct syllabus	* Pupils fail examinations. * Litigation. * Poor performance in league tables.	4/1	Reduce the Risk * The delivery of the syllabus is continually monitored by the Education Committee and senior members of staff.	4	→	Head
6.2	Poor performance in league tables and value added scores	* Effect on School's reputation. * Loss of potential and existing pupils. * Poor ISI inspection.	3/3	Reduce the Risk * Effective processes are in place to monitor and drive up academic standards.	9	→	Head

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)		
	7. ENVIRONMENTAL								
7.1	Changes to waste management and other environmental regulations	* Breach of statutory requirements. * Pollution or health issues.	3/1	Reduce the Risk * School management attend seminars to keep abreast of current and changing legislation. * Consultants used to monitor and advise.	3	→	Bursar		

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)		
	8. PERSONNEL								
8.1	Employment dispute	* Litigation. * Legal and compensation costs. * Lowered morale and disaffection of staff member concerned and possible spread to other staff. * Strike, if dispute widespread.	4/2	Reduce the Risk * A complete review of teaching and support staff employment policies has taken place. * School currently maintains good staff relations. * Staff have good conditions of service. * School takes legal advice on all potentially contentious staff issues. * Good relations with trades unions.	8	→	Head Bursar		
8.2	Loss of key personnel	* Inability to fulfil function of particular role. * Loss of expertise.	3/2	Reduce the Risk * Wherever possible, roles have some overlap. * Wherever possible, knowledge is documented. * Consider private healthcare for key personnel.	6	→	Head Bursar		
8.3	Disabled staff unable to work effectively	* Breach of DDA owing to not making reasonable adjustments. * Litigation. * Lowered morale and disaffection of staff member concerned.	2/2	Reduce the Risk * Disability Policy is in place. * Where necessary, advice of occupational therapists and trades unions is sought.	4	→	Bursar		
8.4	Failure of staff vetting and recruitment procedures	* Recruitment of undesirable personnel. * Breach of legislation and guidance. * Child protection issue.	4/2	Reduce the Risk * School rigorously follows all applicable legislation and guidance.	8	→	Head Bursar		
8.5	Poor staff morale	* Poor staff effectiveness. * Growing and spreading disaffection. * Increased absence.	3/2	Reduce the Risk * Good working conditions are in place. * Headmaster meets fortnightly with the Chairman of the Staff Association. * Regular and comprehensive staff meetings. * Staff issues are addressed.	6	→	Head Bursar		
8.6	Staff Stress	* Poor staff effectiveness. * Growing and spreading disaffection. * Increased absence.	3/2	Reduce the Risk * Good working conditions are in place. * Staff are carefully monitored by line managers. * Staff issues are addressed.	6	→	Head Bursar		

Risk Ref	Potential Risk	Potential Impact	Impact / Likelihood	Mitigation	Risk Score	Movement in Risk since last review	Risk Task-holder(s)
8.7	Unclear or lack of employment terms and policies	* Poor staff effectiveness. * Uncertainty by staff and managers regarding responsibilities. * Breach of employment legislation and of School employment policies.	2/2	Reduce the Risk * Comprehensive contracts, job descriptions and policies are in place and regularly reviewed. * External HR advice.	4	→	Head Bursar

8.8	Discrimination and Bullying	* Poor staff morale. * Growing and spreading disaffection. * Litigation.	2/2	Reduce the Risk * Disability and equal opportunities' policies are in place. * Staff are encouraged to report incidents to line managers.	4	→	Head Bursar		
	9. EXTERNAL								
9.1	Failure of contractors to provide goods or services	* Disruption to operations. * Breach of contract disputes.	3/2	Reduce the Risk * Financial Regulations. * Robust contracts are in place. * Good communications are maintained with contractors. * Stocks of key goods are maintained. * Contingency plans in place for alternative contractors.	6	→	Bursar		
9.2	Undesirable people on site	* Potential of theft and assault.	3/3	Reduce the Risk * All staff and pupils are aware of the risk and report potential intruders. * External security audit required. *Security policy needs to be introduced. * All visitors are required to sign in and are given an identity badge.	9	→	Bursar		