



Risk Management Policy

Introduction

The management of risk is a crucial component of good management practice and corporate governance and underpins the effective delivery of strategic objectives in any organisation. The School accepts that risk can never be totally eliminated; however, it commits to taking all reasonable steps to mitigate risk and to balance the level of risk against the expected reward. This Policy sets out the high-level arrangements for the management, control and assurance of risk at the School.

Definitions

A **risk** is any uncertainty relating to the School's ability to achieve its objectives and execute its strategic objectives. A risk may adversely or beneficially affect the School's ability to deliver its strategy.

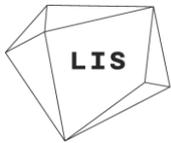
Risk management is the process by which assurance is provided that strategic objectives are more likely to be achieved, by mitigating adverse risks and exploiting beneficial risks.

Roles and responsibilities

The Executive Committee and the Board of Directors will closely monitor key risks and the operation of risk management and control through regular review of the School's Risk Register. The Academic Council will monitor risks relating to the academic delivery of the School. The Audit and Compliance Committee will monitor risks in relating to the School continuing to meet the conditions of registration with the Office for Students. External auditors, appointed by the Audit and Compliance Committee, will provide reports to the Board of Directors on the effectiveness of risk management processes.

The Board of Directors is responsible for determining the appropriate level of risk exposure for the School and has overall responsibility for the School's risk management. It will:

- Monitor the management of key risks through the review of the School's Risk Register on a six-monthly basis, gaining assurance from the Executive Committee on the management of these risks;
- Consider independent reports from external auditors on the effectiveness of management processes to identify, assess, monitor and manage risk;
- Review the outcomes of internal audit work conducted on the risk management process and determines changes as appropriate;
- Review and signs off the Risk Management Policy, authorising any changes proposed by the Executive Committee;
- Delegate authority over academic matters to the Academic Council to ensure an appropriate separation of commercial pressures from oversight of academic quality.



The Academic Council is responsible for monitoring the management of the subset of key risks that are primarily academic in nature. It will:

- Review reports of external examiners, external members of panels and the reports of external accrediting and regulatory bodies in relation to identifying and managing risk;
- Review internal reports and KPIs on academic performance in relation to risk;
- Review policy and political developments in the sector to identify change and manage risk.

The Chief Executive is accountable to the Board for implementing appropriate risk management activities and for allocating responsibilities to Executive Committee members to ensure that the requirements of this Policy are met.

The Executive Committee is responsible for:

- Identifying, evaluating and monitoring the key risks faced by the School and for scrutinising the actions to mitigate those risks, via monthly review of the Risk Register, commissioning deep dives into principal risks;
- Advising the Board on material business risks, the operation of risk management strategies and controls, and the effectiveness of risk management processes;
- Approving major projects or investments that affect the School's risk profile, within the limits of the Committee's delegated authority;
- Recommending changes to the Risk Management Policy to the Board of Directors.

The Registrar is responsible for ensuring that the Risk Register is regularly updated, in discussion with the relevant risk owners, and will submit the Risk Register for review to the Executive Committee on a monthly basis, and to the Board of Directors and Academic Council on a 6-monthly basis, ensuring that any amendments are flagged.

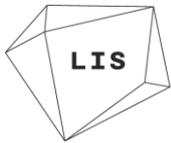
The External Auditor is responsible for:

- Reviewing and advising the Board of Directors on the School's overall risk exposure and strategy;
- Reviewing the effectiveness of the School's management processes for identifying, assessing, monitoring and managing risk.

The [Audit and Compliance Committee](#) is responsible for:

- Identifying, evaluating and monitoring any risks relating to a breach of the ongoing conditions of registration in relation to the public interest principles, specifically those relating to regularity, propriety and value for money.
- Reporting any risks identified to the Board of Directors.

To ensure appropriate objectivity, independence and expertise in relation to these matters, the PIPS Panel will comprise two lay members of the Board of Directors, an external member not associated with the School with the requisite experience and expertise in higher education governance, finance and audit. The Panel will be supported by the Registrar.



The Registrar is responsible for overseeing a rolling internal audit programme to uncover any underlying risks in the operation of the School. S/he is also responsible for reporting to the Board of Directors on matters relating to the School's risk management, control and governance; its delivery of value for money; and the management and quality assurance of data.

All managers are responsible for managing risk within their areas and have a duty to inform the relevant Executive Committee member where there is a material risk.

All staff are responsible for complying with this Policy and managing any risks associated with their operational activities and processes, and for informing their line manager where there is a material risk.

Risk management

The School seeks to identify, assess, and effectively manage all risks to the delivery of its strategic objectives. The School's Risk Register identifies key risks by area of delivery and organisational owner, sizes the potential impact of the risk and likelihood of the risk materialising (giving the risk an overall risk rating), and details actions to mitigate that risk. The risks captured in the Risk Register are summarised in a School Risk Map.

Given the size and youth of the School, the Risk Register will capture all risks facing strategic delivery, including risks associated with major projects and investments. This will include any academic risks, and any risks relating to a breach of the conditions of registration. The Public Interest Principles and Standards Panel will have delegated authority from the Board of Directors to provide additional oversight over these risks, specifically in relation to propriety, regularity and value for money. The Academic Council will have delegated authority from the Board of Directors to monitor and manage academic risks.

The Executive Committee will review the Risk Register on a monthly basis; the Board of Directors and the Academic Council will review it on a six-monthly basis. This process may involve the introduction of new risks, the amendment of existing risks, and the deletion of risks that are no longer deemed relevant or applicable.

The Audit and Compliance Committee will report to the Board of Directors on a six-monthly basis on the School's risk profile in relation to breaching any conditions of registration and will report to the Board at any time it perceives a risk to have emerged or increased.

In the general conduct of their duties and in the oversight of the rolling internal audit programme, the Registrar will report any risks relating to School delivery, propriety and regularity, value for money and risk management, control and governance to the Board of Directors.

Risk management should be incorporated into all key School processes, including Strategy, Operational Planning and Delivery, Admissions, Marketing and Recruitment, and Teaching and Learning. The School strives to embed a culture in which risk management is a key



component of all decision-making and is seen as a necessary approach to supporting innovation and delivery. This is supported by:

- Clear accountability for and ownership of specific risks (captured in the Risk Register);
- Transparent information flowing up and down the School, via regular review of the Risk Register at the Executive Committee and at the Board of Directors and Academic Council;
- Ensuring that a diversity of perspectives are brought to bear on risks and risk management through review of the Risk Register at the Executive Committee, the Board of Directors, and the Academic Council; as well as through the Audit and Compliance Committee, the external auditors, and the Registrar;
- Training in risk management for relevant staff;
- Managerial encouragement of appropriate risk-taking behaviours and challenging and sanctioning of inappropriate behaviours.

Training

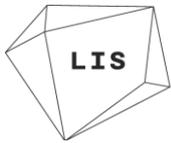
Training in risk management will be mandatory for

- All staff in senior management roles;
- All staff with responsibility for strategic or operational planning; and
- Staff who are designated to attend by their line managers.

The organisation and delivery of risk management training will be the responsibility of the Director of Finance.

Monitoring and Review

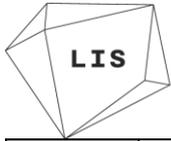
This Policy will be reviewed annually by the Executive Committee to ensure that it is fit for purpose, and any changes will be approved by the Board of Directors.



Version Control

Name of policy/procedure:	Risk Management Policy
Document owner:	Hannah Kohler, Director of Admissions and Student Support
Date Originally Created:	01/2019
Last reviewed:	10/2021
Reviewed by:	Dr Andrew Redford (Head of Quality)
Audited by:	Board of Directors
Date of Audit:	11/2019
Date of next review: (annually unless otherwise agreed)	10/2022
Related documents: (e.g. associated forms, underpinning processes, related policies or overarching policies)	Business Continuity Plan Risk Register IT Disaster Recovery Plan Student Protection Plan Governance articles

Version Control			
Version	Author	Date	Brief summary of changes
1	Hannah Kohler (Director of Admissions and Student Support)	13/01/2019	Original draft
2	Jasper Joyce (Director of Finance and Operations)	12/03/2019	Minor wording changes
3	Ed Fidoe (Chief Executive)	14/03/2019	Minor wording changes
4	Hannah Kohler (Director of Admissions and Student Support)	20/06/2019	Expanded detail on role of Board, included responsibilities of Academic Council, Registrar and External Auditors
5	Hannah Kohler (Director of Admissions and Student Support)	08/07/2019	Minor changes
6	Board of Directors	18/11/2019	Approved



7	Hannah Kohler (Director of Admissions and Student Support)	03/03/2020	Changed named of PIPs Panel to Audit and Compliance Committee (establishment of which was approved by the Board in Feb 2020, to replace PIPS Panel)
8	Dr Andrew Redford (Head of Quality)	10/2021	Minor changes of job titles