



# Risk Management Policy

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*Together, pursuing life in all its fullness*

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V2	March 2022	RSM / Louise Beale	Re written policy on new template, incorporates strategy that was previously a separate document
V2.1	February 2024	Louise Beale	Reviewed, minor amendments and addition of 2 risks in Appendix 3

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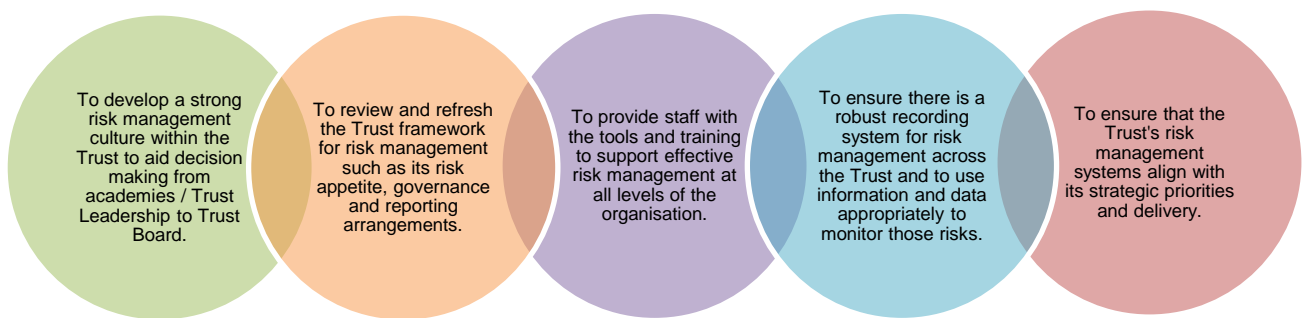
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## 1.0 Introduction and Objectives

This risk management policy forms part of The Diocese of Coventry Multi Academy Trust's (the Trust's) internal control and corporate governance arrangements, covering all aspects of the organisations risk management approach.

This document explains the Trust's underlying approach to risk management, documents the roles and responsibilities of the Headteachers, Academy Governance Committees, Central Team, Trust Leadership Team and Board of Directors. It also outlines key aspects of the risk management process and identifies the main reporting procedures.

In addition, it describes the process the Academy Governance Committees, Audit & Risk Committee and Board of Directors will use to evaluate the effectiveness of the Trust's internal control procedures.



In order for the Trust to be successful it is important that risk has a suitably high profile and everyone recognises the part they play in helping to manage risk. Risk should not be seen as an 'add on' to your role or something that someone else does. Risk is all around us and part of our day-to-day life and therefore it is important that each and every one of us can recognise a risk and has the ability to raise concerns appropriately.

Risk Management is beneficial to the Trust and the academies as it:

- helps us to be more flexible and responsive to new internal / external demands;
- provides assurance to academy Leadership, Academy Governance Committees, Central & Trust Leadership Team, Trust Committees and Board;
- reduces incidents and other control failures; and
- helps in the achievement of the Trust's key strategic objectives.

Managing risks across the Trust reduces the chance of us having to deal with the unexpected and ensures proactive management rather than reactive crisis management. As a publicly funded organisation it is especially important to manage risk to ensure the best possible use of resource.

This document highlights the Trust's framework for managing risk and sets out the process through which risks will be identified, assessed, controlled, monitored and reviewed.

## 2.0 Scope

This policy and any associated procedures, guidance, templates, training and instruction, apply to all Board members, Trust Leadership Team members, management and staff employed by the Trust and its academies, and people representing the Trust such as contractors and consultants.

All foreseeable strategic and operational risks will be identified, evaluated, documented, monitored, and treated in keeping with this policy.

This policy does not support person-specific or asset-specific risk assessments and is instead designed to support safe and effective operational service delivery from the Board to Academy Teams, and all those departments in between within the Trust.

### 3.0 Policy

#### 3.1 Risk Statement

Risk Management is an integral part of the Trust's quality, governance and performance management processes and seeks to increase the probability of success and reduce the likelihood of failure.

All staff have a role in considering risk and helping to ensure it does not prevent the delivery of a high-quality learning experience.

The Trust seeks to encourage a culture in which risk assessment and management of risks are an integral part of decision-making, and where necessary, resources are proportionately directed to manage risks to the safety of pupils, staff and visitors, the quality of learning and assets of the Trust.

Sound risk management will be employed to maintain regulatory and legislative compliance, assist in the continuous improvement of the quality of education delivered to pupils and improve the Trust's processes and procedures.

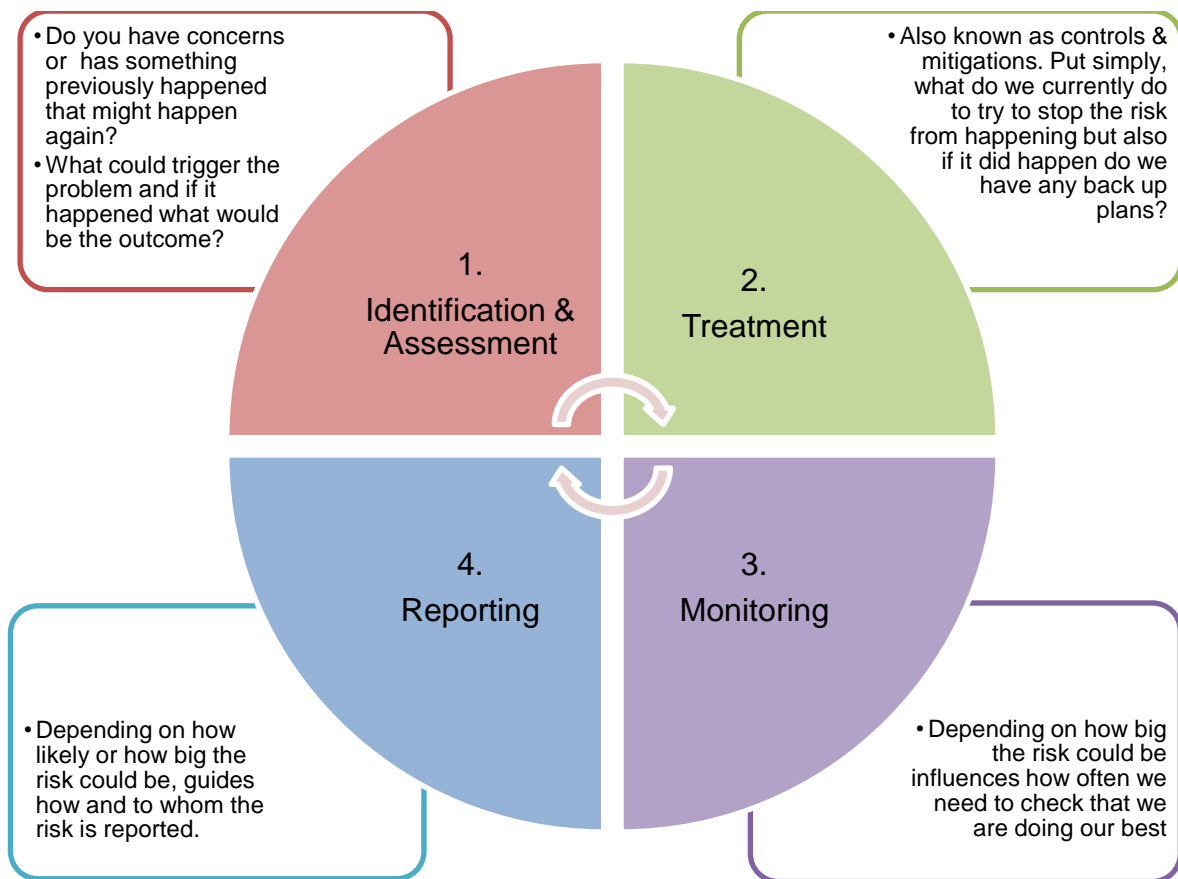
To do this the Trust has set out the following policy so that all staff are able to:

1. Identify & assess risk
2. Identify and implement suitable risk treatment (controls) to help reduce the likelihood of risks happening or the impact they cause
3. Monitor how well the risk is being managed and any improvements needed
4. Report risk using the relevant reporting system and escalation process

The diagram below outlines what the risk management approach looks like in practice:

#### **Approach - What does this mean to me?**

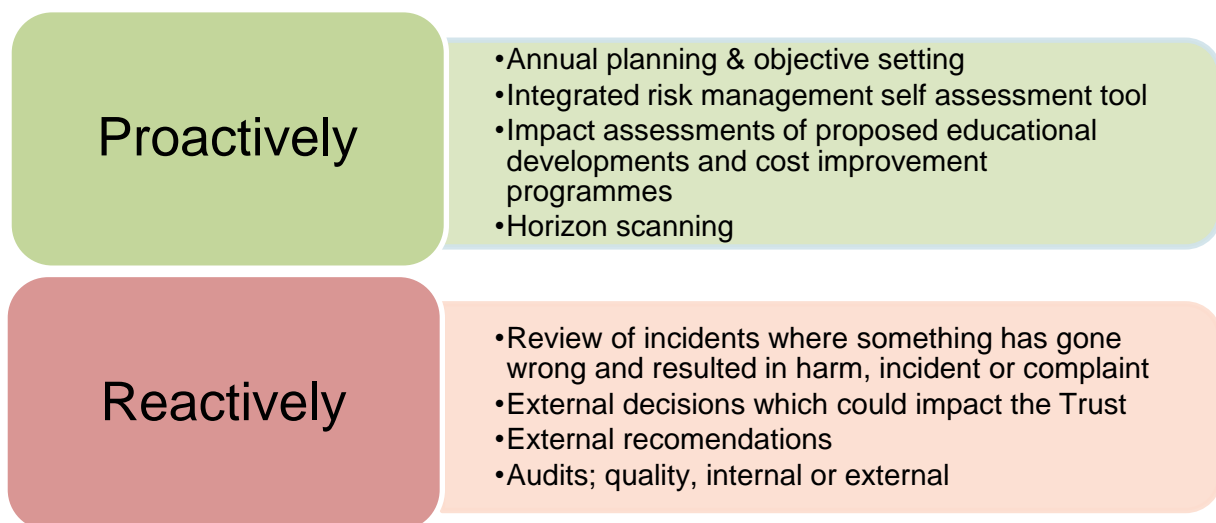
**If you are a staff member, an existing risk owner, have inherited risks from changing roles or think there is something that should be on the risk register then you must familiarise yourself with this policy and the overall approach. The policy has "what does this mean to me" boxes like this throughout the document to summarise what you need to know and do.**



### 3.2 How we Identify a Risk

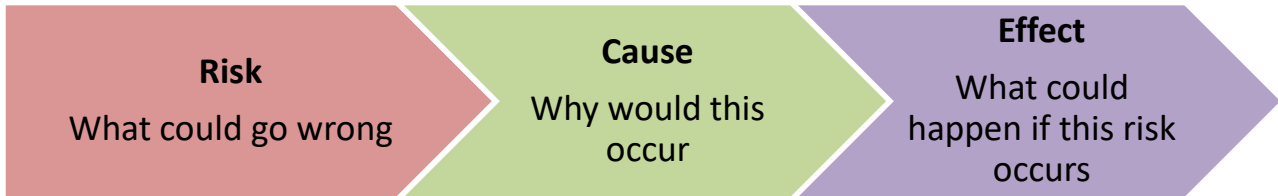
There are two ways in which we can identify risk. Either by looking ahead and thinking what might happen (proactively), or by learning from experience or others (reactively).

The diagram below gives some examples of how we might identify a risk:



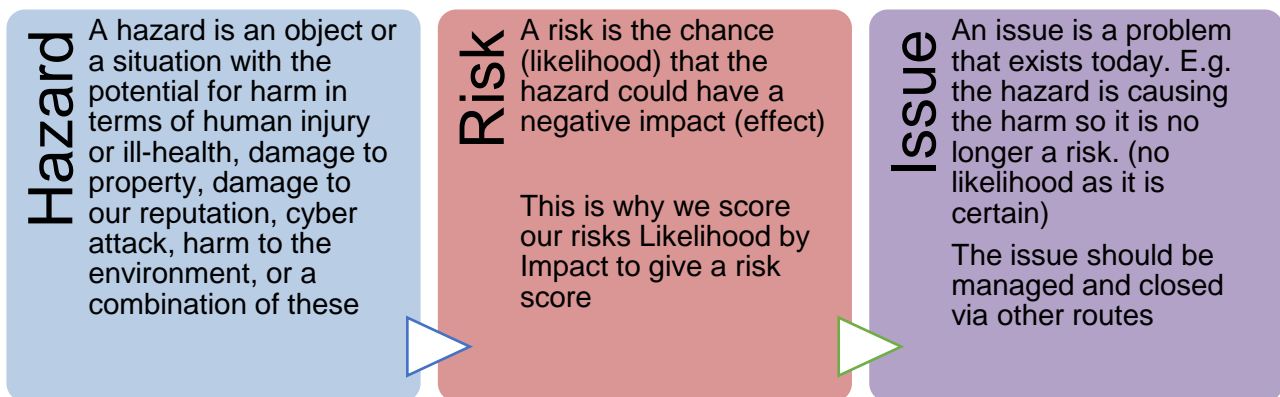
### 3.3 Risk Assessment

Once we have identified a risk, we must assess how significant it is and how likely we think it is to happen. To do this we must consider why the risk would happen as this is what influences the likelihood. Then we must consider the effect the risk would have which will tell us how big the potential impact could be.



Risk Assessment generally begins with understanding the objective (what the Trust is trying to maintain or achieve) and then an identification of hazards that may prohibit or delay achieving that objective. The cause and impact of these hazards coming into effect are what is being assessed.

The difference between hazard, risk and an issue is explained below:

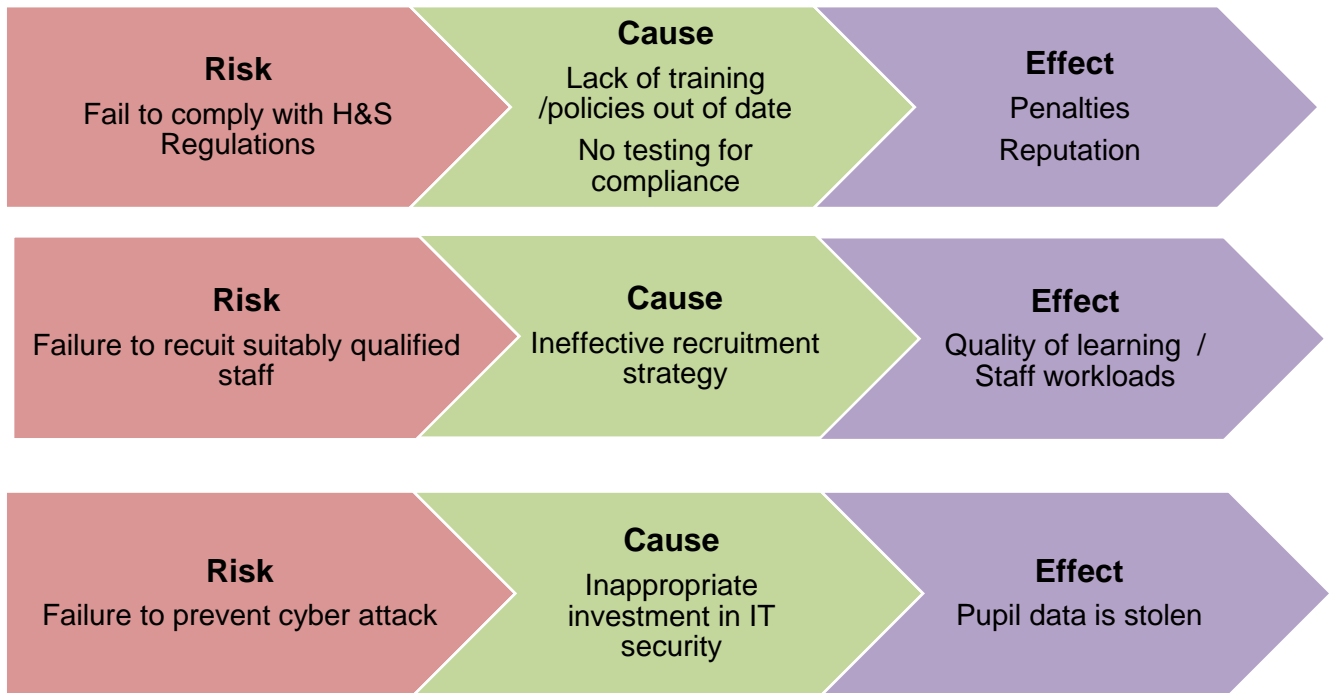


### 3.4. How Risk is Recorded

Once we have identified a risk, owners must record it so that the Trust can continue to monitor and ensure we are managing the risk. A risk owner is the accountable person best placed to manage the risk, as risks escalate they may change ownership to reflect seniority and responsibility.

All our risks must be recorded on risk registers in order that the Trust can document, manage, and monitor risk. By recording risk allows the Trust to create “Risk Registers” which are the central point for recording and monitoring the lifecycle of risk assessments. It is here that the manager of each risk register must maintain these risk records and manage improvement actions.

As explained earlier risks are to be described using cause and effect to support the risk description so that at a glance the Trust can understand what could cause the risk and how the Trust could be impacted if it was to happen. Simplified examples are:



### 3.5 How Risk is Evaluated

The Trust uses a 5 by 5 risk grading matrix which helps assess, using scores of 1-5, the likelihood and impact (see below) of each risk. Each risk must be given an INITIAL grade before controls based on there being nothing in place to help manage the risk. The risk owner must then rate the risk with its CURRENT grade after controls i.e. where we believe it sits today based on what we are doing to prevent the risk from happening and also what we have in place to reduce the impact should the risk occur.

Finally, the risk must also be given a TARGET score to demonstrate where we would like the risk to be once all controls are in place and actions are complete.

The current score effects how the risk will be reported through.

Risk scoring matrix	Likelihood →				
	Impact ↓	1 Rare	2 Unlikely	3 Possible	4 Likely
5 Major	15	19	22	24	25
4 High	10	14	18	21	23
3 Medium	6	9	13	17	20
2 Low	3	5	8	12	16
1 Negligible	1	2	4	7	11

RAG	High Risk (score = 20-25)	Very High Risk (score = 15-20)	Medium Risk (score = 10-15)	Low Risk (score = 5-10)	Very Low Risk (score = 0-5)
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The risk grading matrix above has a series of definitions that set out what each impact and likelihood category mean. The impact risk score (1-5) is taken from the relevant risk themes within the impact description category and determined by the highest impacted category theme. The

likelihood score (1-5) is determined similarly but based on how likely we believe the risk is to occur. A more detailed scoring matrix can be found in the appendix 6.1 which provides examples of how we might differentiate between an impact or likelihood score.

**Scoring - What does this mean if I am a risk owner?**

**When populating a risk register you will be required to rate the risk three times.**

- **Firstly, the INITIAL grade imagining there are no controls in place.**
- **Secondly, will be the CURRENT grade, which after everything we currently do is where the risk sits today.**
- **Lastly, the TARGET risk grade comes from where you hope the risk to be once further actions are completed.**

### 3.6 Assurance

To ensure the effectiveness of the risk management framework, the Trust considers the causes and effects of the risk, records the risk controls in relation to the causes and effects and how effective they are, giving consideration to the following:

- a) existence of the control
- b) consistent application of the control
- c) Achievement of outcomes expected by the control.

A Residual Risk score is then calculated based on the Risk Controls in place. Actions required are identified to further reduce the Residual Risk Score over time.

### 3.7 Risk Appetite

Risk appetite is a way of expressing our attitude to different types of risk and the nature of the risks we are prepared to take. Our appetite for risk can vary dependent on the nature of the risk and the prevailing operating conditions or circumstances.

We have developed an approach to defining the Trust’s risk appetite. The risk appetite is not absolutely prescriptive but instead provides a number of underlying component parts that encourage structured thinking. The aim of the risk appetite is to allow us to reach an informed conclusion as to whether the risk can be accepted and to what extent.

Risk appetite can be defined by the following five categories:

<b>Hungry</b>	Eager to be innovative and take risks in the right circumstances
<b>Open</b>	Willing to consider all potential options, subject to continued establishment of controls: recognising that there will be risk exposure.
<b>Cautious</b>	Preference for safe, though accept there will be some risk exposure: a low / medium likelihood of occurrence.
<b>Minimal</b>	Ultra safe leading to only minimum risk exposure: a negligible / low likelihood of occurrence.
<b>Averse</b>	Avoidance of any risk exposure: a negligible likelihood of occurrence.

To enable translation of the risk appetite into the Trust’s risk scoring methodology, the tolerance for each risk appetite has been plotted on the matrix below i.e. at what point a risk is acceptable (within tolerance) and when it is not (outside tolerance).

<b>RAG</b>	<b>High Risk</b> (score = 20-25)	<b>Very High Risk</b> (score = 15-20)	<b>Medium Risk</b> (score = 10-15)	<b>Low Risk</b> (score = 5-10)	<b>Very Low Risk</b> (score = 0-5)
<b>Risk Appetite</b>	<b>Hungry</b>	<b>Open</b>	<b>Cautious</b>	<b>Minimal</b>	<b>Averse</b>

### 3.8 Risk Appetite Monitoring and Reporting

We will continue to keep under review the Trust’s risk appetite, fully recognising that this may be subject to change due to various factors both internal and external that could shape the nature and extent of the risks we are prepared to take.

**Monitoring** - The Trust will align existing risks with risk appetite themes. In addition, we will report the volume (including an approximation of cumulative exposure/risk clusters) of risks by risk theme v risk appetite and develop a set of reporting tools, as appropriate, to help measure / inform risk appetite. Some risks are owned by Trust Committees others discussed directly at Board. All are overseen by the Audit and Risk Committee.

**Risk Appetite Reporting** - A cycle of reporting by risk appetite will be introduced so that the Trust can understand its risk exposure in connection with the risk appetite themes and ensure an effective response.

**Operational and Strategic** - Risks depending on how they could affect the Trust are managed through different levels of the organisation.

To do this, risks are separated into two categories; Operational and Strategic as explained below.

#### Risk Appetite - What does this mean if I am a risk owner?

**If a risk is deemed to be outside the Trust’s risk appetite, for example a high scoring risk or a risk has unacceptable outcomes if it were to occur, you will be asked what improvement actions can be identified to bring the score in line with acceptable levels. A more senior risk owner may be appointed to lead the risk through the necessary improvements.**

**Operational Risks** are those experienced by each part of the Trust in their operating environment - Academy / Directorate / Department / Team / Support Functions that may impact service delivery, the safety of pupils, staff, visitors, or preservation and value of assets by exposing them to harm, loss, or damage. These risks are managed by local management and detailed in each risk register.

**Strategic Risks** are directly linked to the Trust's strategic objectives, and are expressed and managed by the Trust Leadership Team and reported to the Audit and Risk Committee and Board of Directors as part of the Board Assurance Framework.

Put simply:

### Operational Risk

- These are our everyday risks, such as managing curriculum delivery, health and safety, IT, estates, staffing, finance etc
- These risks will be typically managed locally and will be escalated to different levels of management depending on risk scores (See Appetite)

### Strategic Risk

- These are the risks that directly link to, and could stop us, achieving our strategic objectives
- Our strategic risks are logged on our strategic risk register and links to the Board Assurance Framework, managed by the Trust Leadership Team and overseen by the Board of Directors



## 4.0 Responsibilities

Responsibilities change as risks move up through the organisation. With each new level comes a different level of management responsibility as explained below;

All staff have a responsibility to **identify and report** any risks they see to their appropriate manager.

Headteachers and Heads across each Academy have a responsibility to **record and report risks** via the risk management framework and ensure that risks and any relevant actions are updated regularly.

**Risks scored above the agreed risk appetite will be highlighted to the appropriate Trust Leadership Team member, Academy Governance Committee and relevant Committee**

The Trust Leadership Team and central team has a responsibility to ensure that any risks that fall under their remit are being **appropriately managed** and if not, ensure appropriate action is taken.

**Risks graded above the defined appetite or which have a low level of assurance are managed here and / or escalated for review**

The Board and its Committees (including Academy Governance Committees) have a responsibility to ensure that all Trust high level operational risks and strategic risks are being managed effectively by risk owners and **provide check and challenge** on the effectiveness of the controls in place.

## 4.1 Role of the Board of Directors

The Trust Board has a fundamental role to play in the management of risk. Its role is to:

- **Develop** the tone and influence the culture of risk management within the Trust. This includes:
  - determining that the Trust is 'risk taking' or 'risk averse' as a whole or on any relevant individual issue
  - determining what types of risk are acceptable and which are not
  - setting the standards and expectations of staff with respect to conduct and probity.
- **Develop** the appropriate risk appetite or level of exposure for the Trust.
- **Monitor** the management of all the Strategic Risks & significant operational risks via Trust Leadership Team update reports and satisfy itself that the less significant risks are being actively managed, with the appropriate controls in place and working effectively.
- **Approve** major decisions affecting the Trust's risk profile or exposure.

## 4.2 Role of the Audit and Risk Committee

The Audit & Risk Committee has an overall responsibility for providing the Board of Directors with assurance over the on-going effectiveness of the risk management framework, covering all aspects of risk, including financial, operational and compliance. In doing so the Audit and Risk Committee will receive assurances from the Board Committees who are responsible for monitoring of the strategic risks and other key areas of risk allocated to them via their own scrutiny and deep dives as part of that committee agenda.

## 4.3 Role of Board Committees (except Academy Governance Committees, AGCs)

The role of each Board Committee at each of their scheduled meetings is to **Monitor** and seek assurance over the management of risks for which they are responsible, engaging with the Trust leadership Team and staff as appropriate, including deep dives for the purpose of providing assurance to the Audit and Risk Committee.

## 4.4 Role of Trust Leadership Team

The role of the Trust Leadership Team is to:

- **Develop** a knowledge of risk management and its benefits.
- **Develop, deliver and monitor** the risk management approach.
- **Develop and deliver** contingency plans in those areas that are considered high risk.
- **Deliver** systematic, economical and effective management of risk and its processes and ensure processes are disseminated and are embedded throughout the Trust.
- **Monitor** the approach to risk management and approve changes or improvements to key elements of its processes and procedures including continuous development, promotion & implementation of risk management throughout the Trust.
- **Monitor** and evaluate all known risks to ensure that they are being actively managed, with the appropriate controls in place and working effectively and update the Trusts' Strategic Risk Register at least once a term.
- **Monitor** the Risk Appetite and make recommendations for approval to the Board.
- **Monitor** any training requirements to enable the development & implementation of risk management.
- **Report** on the Strategic Risk Register to the Board and ARC at each of its scheduled meetings.
- **Report** experience on risk, risk management, strategy implementation across the Trust and provide regular updates to the Board on progress and or relevant matters arising.
- **Report** to each meeting of the relevant Committee(s) on the status of risks and controls pertinent to their specific remit.

The Head of Operations and Compliance will take overall responsibility for the administration and implementation of the risk management process.

## 4.5 Role of Academy Governance Committees (AGCs)

The role of the AGC at each of their scheduled meetings is to **monitor** and satisfy itself that all known risks relevant to that Academy are being actively managed, with the appropriate controls in

place and working effectively. **Report** to the Trust Leadership Team on key risks and related issues within the academy.

#### 4.6 Role of Academy Headteachers

The role of Academy Headteachers is to identify and manage all known risk and in addition:

- **Deliver** the details of the approach for the academy, including allocating responsibilities for implementation of actions and management of controls where relevant.
- **Deliver** implementation of the approach across their site.
- **Deliver** sharing of relevant information with others.
- **Report** risk that exceeds the defined appetite to Academy Governance Committees and escalate to Trust Leadership Team.
- **Report** feedback to the Trust Leadership Team on their experience of implementing the approach and their perceptions of the effectiveness and training needs on risk management for staff.

#### 4.7 Managers and Staff Regarding Risk Management

The Trust's managers and staff have a duty to ensure that risk is managed effectively in their area. This includes engagement with colleagues through formal and informal processes.

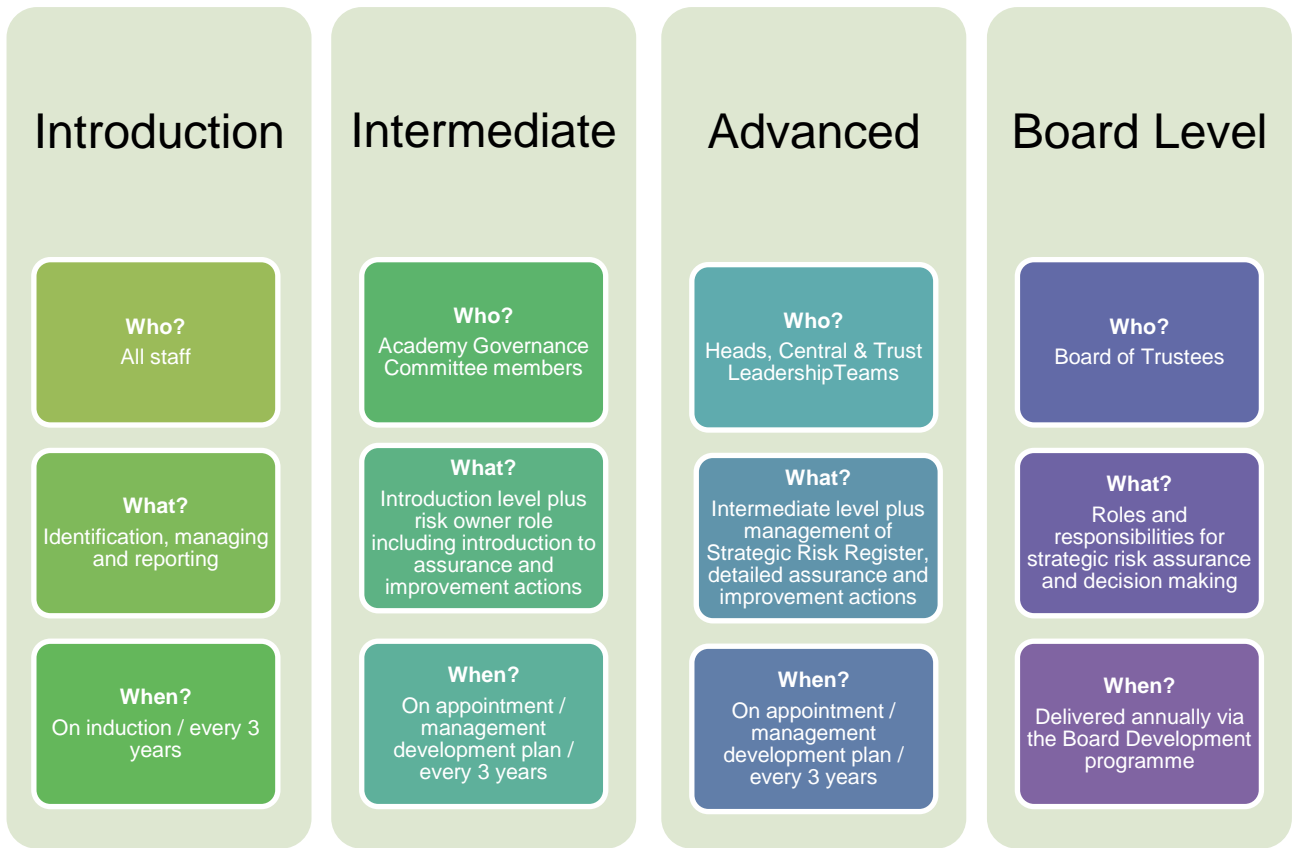
All staff across the Trust have a responsibility for identifying risks in performing their daily duties and taking action to limit the likelihood and impact of these risks.

#### 4.8 Training

All staff will be required to undertake risk management training.

The training will be delivered via workshops, online seminars and one to one support as appropriate. Those identified with increasing responsibility for risk and reporting may be required to attend additional specific risk training.

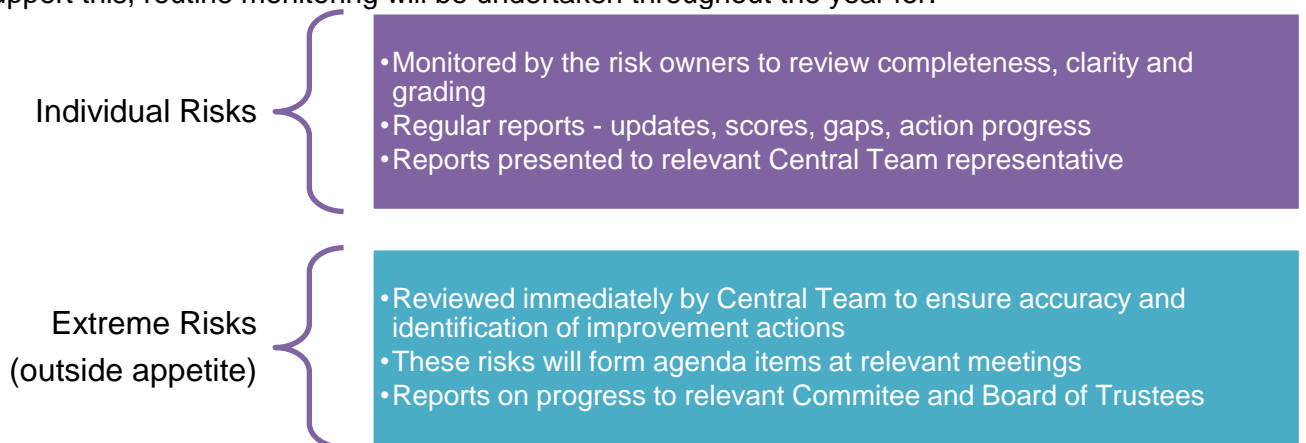
Risk training will follow the outline principles below:



## 5.0 Monitoring

Adherence to this policy will be monitored on a regular basis and reported to the relevant committees. The Trust's approach and discharge of risk management will also be regularly assessed by internal audit function as part of the Annual Audit Plan.

To support this, routine monitoring will be undertaken throughout the year for:



Risk Registers will be monitored on the standard of information, how often they are reviewed, what specific risks monitoring is occurring and where. The diagram below provides a quick overview of this.



## 6.0 Appendices

### 6.1 Appendix 1 - Risk Scoring Matrix Themes

Rating	Rating Scale	Safeguarding / Health & Safety	Growth & Transformation	Infrastructure	Staffing Capability & Capacity	Resilience	Finance	Governance	Quality
NEGUGIBLE	1	No risk of injury. H&S compliant.	No or little change anticipated or required Little Opportunity lost	Negligible issues for estates or IT systems	Stakeholders not impacted or aware of a problem, Minimal effect on staff.	High control standards maintained and recognised.	Between 0-5% of associated budget	Compliance with all relevant policy and procedures	Negligible effect on performance
Low	2	Minor injury. H&S policy not regularly reviewed.	Limited recent or anticipated changes required will not be achieved Loss of Small opportunity with low benefits	Minor issues or implications for the standards of estates / IT Systems	Some Stakeholders aware of issues, but impact on workflow is minimal. Potential for additional workloads intruding into normal non-working time	Unsuccessful attempted access to operational systems. Minor disruption to school day	Between 5-10% of associated budget	Minor noncompliance with policy and / or procedure / review date missed / training / internal control/ comment within audit report	Marginally impaired – slight adjustment to service delivery required
Medium	3	Injury, possibly serious. H&S standards insufficient / poor training.	Modest changes recently required or anticipated will not be achievable Loss of Marginal opportunity with moderate benefits	Marginal issues implications for estates / IT Systems	A number of Stakeholders are aware and impacted by our issues. Increase in workloads. Intrusion into normal non-working time	Physical or cyber-attack into operational systems. School day disrupted	Between 10-25% of associated budget	Noncompliance with policy and / or procedure / review date missed / training / internal control/ comment within audit report	Education quality impaired – changes in delivery required to maintain performance
High	4	Significant Injury possibly leading to loss of life. Safeguarding Breakdown H&S investigation resulting in investigation and loss of revenue.	Significant changes required or anticipated will not be achievable Loss of significant opportunity with multiple benefits	Significant implications for estates / IT systems	Significant disruption and or Cost to Stakeholders / third parties. Significant intrusion into staff's time.	Police investigation launched; operational data or control systems may be compromised. School week disrupted	Fraud, corruption and serious irregularity at Academy Between 25-50% of associated budget	Noncompliance with legally required policy and / or procedure / training not completed / internal control failings/ Significant finding within audit report	Significant reduction in quality experienced/ and / or Learner performance
Major	5	One or a number of fatalities. H&S breakdown causing serious fine, investigation, legal fees, and prosecution	Major complex changes are required or anticipated will not be achievable Loss of major opportunity with multiple long-term benefits	Major implications and potential irreparable damage to estates / IT systems	Stakeholders / Third parties suffer major disruption and/or loss. Serious to major effect on staff lives & well-being.	Systems totally compromised. Schooling disrupted greater than 2 weeks	Fraud, corruption and serious irregularity at more than one Academy Greater than 50% of associated budget	Noncompliance with multiple legally required policies and / or procedures / Major internal control failings/ Multiple Significant findings within audit report/ Trustees held accountable	Complete Failure in standards and performance

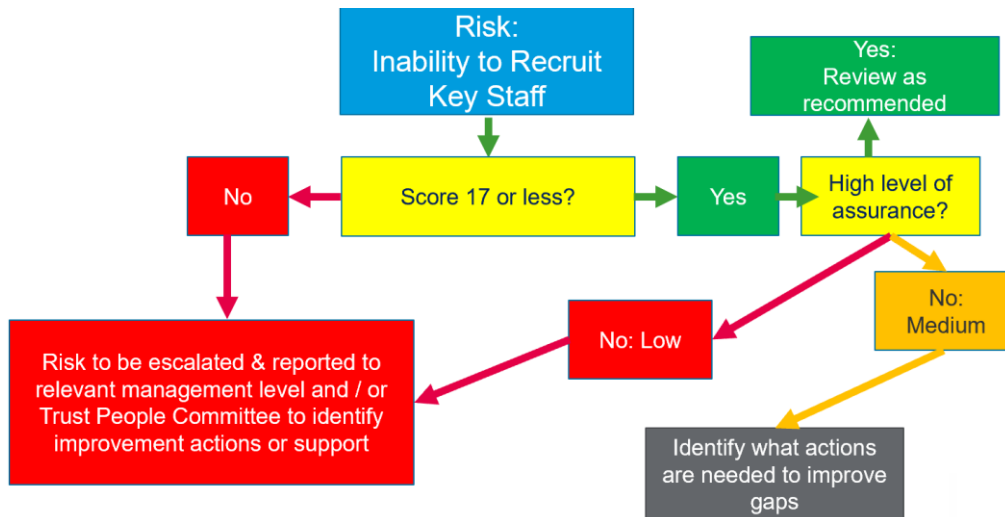
Rating	Rating Scale	Likelihood	Example of Loss event Frequency
RARE	1	This will probably never happen / recur	1 year or less frequently
UNLIKELY	2	Do not expect it to happen / recur but it is possible it may do so	Once a year
POSSIBLE	3	Might happen or recur occasionally	Once every 6months
LIKELY	4	Will probably happen /recur but it is not a persisting issue	Monthly
ALMOST CERTAIN	5	Will undoubtedly happen /recur, possibly frequently	At least weekly

## 6.2 Appendix 2 – Glossary of Terms

Term	Description
Assurance	An opinion based on evidence gained from the review of the Trust governance, risk management and control framework that risk assessments and control responses are appropriate, adequate and achieving the effects for which it has been designed.
Cause	The reason for the risk exposure – why would a risk occur?
Current Risk Grade / Score	The grade given to a risk, AFTER taking into account the risk controls.
Effect	The impact for the risk exposure – what would be the consequence if the risk materialised?
Exposure	The consequences that arise from the realisation of a risk.
Initial risk grade	The classification the Trust gives to a risk, based on its likelihood and potential impact and BEFORE the application of the risk controls.
Consequence	The effect that a risk would have on the Trust if it occurred.
Likelihood	The probability of a risk occurring.
Risk Owner	The person responsible for ensuring the risk is properly managed and monitored.
Risk	The threat or possibility that an action or event will adversely or beneficially affect the Trust's ability to achieve its objectives.
Risk appetite	The level of risk the Trust is prepared to accept or tolerate before considering action necessary.
Risk assessment	The process by which the Trust identifies and assesses the risks associated with its activities.
Risk Control	An action or process that the Trust currently has in place to either reduce a risk to an acceptable level or increase the probability of a desirable outcome.
Risk management	"Risk Management is the process which aims to help the Trust understand, evaluate and take action on all our risks with a view to increasing the probability of our success and reducing the likelihood of failure".
Risk Register	A document for capturing, monitoring and communicating valuable information about each risk the Trust identifies.

### 6.3 Appendix 3 – Risk Appetite Statement

The Trust has identified a number of strategic risk appetite themes against which we have assigned a risk appetite level. For example, “Staffing” has an open risk appetite level so any relevant staffing risks would follow a similar process to the flow diagram below.



Risk	Description	Theme	Risk Appetite Level	Committee oversight
STR 1	Deterioration in education quality, Christian distinctiveness and outcome (Ofsted / SIAMS criticism of the academies)	Quality	Minimal	Education and Ethos Committee
STR 2	Significant Safeguarding Failure	Safeguarding / Health & Safety	Averse	Education and Ethos Committee
STR 3	Significant Health and Safety failure	Safeguarding / Health & Safety	Averse	Business and Finance Committee
STR4	Significant data or cyber security breach	Infrastructure	Minimal	Business and Finance Committee
STR 5	Inability to effectively respond to policy change	Resilience	Minimal	Trust Board
STR 6	Unable to achieve sustained development transformation (and growth) of the Trust	Growth and transformation	Cautious	Trust Board
STR 7	Significant Governance or leadership failure	Governance	Minimal	Trust Governance Committee
STR 8	Unable to achieve financial resilience of the Trust	Resilience / Finance	Minimal	Business and Finance Committee
STR 9	Unable to maintain, develop and build staffing capacity and capability and wellbeing	Staffing capability and capacity	Minimal	People and Pay Committee
STR 10	The academy estate is not fit for future	Infrastructure	Cautious	Business and Finance Committee
STR 11	Not effectively engaging with parents, guardians, communities and wider stakeholders	Growth and transformation	Cautious	Education and Ethos Committee
STR 12	Failure to develop fruitful collaborations and partnerships	Growth and transformation	Cautious	Trust Board