

TBAP Strategic Policy
Control Document
(SPCD) 2015 -16



A GOVERNANCE				BOARD NOT MAKING STRATEGIC DECISIONS BASED ON GOOD QUALITY INFORMATION				
RISK No	AREA OF RISK	BRIEF DESCRIPTION OF RISK	BRIEF DESCRIPTION OF CONTROLS	PRIORITY RAG (Red Amber Green)	Risk Likelihood of occurring	RISK OWNER(S)	COMMITTEE RESP	NEXT REVIEW DATE
A1	Trust lacks direction, strategy and forward planning	The Trust will drift with no clear priorities or plans. Issues are addressed without strategic reference.	Trust has a 5 year strategic plan which sets out key aims, objectives and policies. Trust has 3 year financial plan and budgets. Trust improvement plan sets out actions, planned outturns and success criteria for coming academic year. Committees monitor educational and financial performance. Student and parental surveys are undertaken.		LOW	Chair of Board	Trust Board	September 2016
A2	Board lacks relevant skills to oversee the Trust	Trust fails to recognise importance of an area of its operations (probably non educational) inadequate or late decisions result in poor value for money. Board relies on staff and outside professional advice and strategic decisions begin to be made elsewhere.	A list of skills required by the Board is monitored regularly and the skill set of the existing governors is shown as a matrix and is considered when a new trustee appointment is being made. Governor training is offered and taken up. Governor role descriptions drawn up for Chair and Vice Chair. Trustee recruitment process overseen by Board. We have two new members to the Board and a new Teacher Representative. There is a requirement to ensure that there are enough Board members with educational knowledge. There will be three additional schools from July 2016 who are keen to be involved. The Board does need to respond to growth.		MEDIUM	Clerk to Board	Trust Board	March 2016
A3	Trustees and/or school leadership have commercial or personal conflicts of interest which are not declared or procedures are improperly followed OR they are paid	Decisions are made outside Board structure. Board cannot operate effectively re value for money. Possibility of EFA / DfE or other outside body action. Adverse impact on Governor or staff morale.	Procedure covering conflict of interest and payment of trustees set out in mem and arts of Trust. Meeting procedure and Board decisions well documented and follow best practice. Register of business interests disclosed at meetings. Currently only CEO and staff gobs are paid by Trust. The Conflict of interest forms are		LOW	Chair of Board/ CEO	Trust Board	October 2016

	by the Trust without clear justification.		circulated every September.					
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A4	Trust undertakes activities outside its objects	Liability to repay funders / Loss of funding or DfE confidence / Potential breach of trust deed and regulatory issues.	The Trust's financial systems operate separate and discreet restricted funds to ensure designated funding is used appropriately. Unusual projects are reviewed in advance to ensure funding requirements are met.		LOW	Chair of Board / CEO	HRFP Committee	March 2017
A5	Loss of key trustees or Trust leadership	Loss of contact base and corporate knowledge. / Loss of experience and skills. / Operational impact on delivery of projects and priorities.	Succession planning is undertaken for Board trustees and senior staff. / Systems are documented to allow new postholders to take up a post "running". / Training for new Trustees and staff is provided. / Contracts for key staff contain adequate notice periods.		MEDIUM	Chair of Board / CEO	HRFP Committee	November 2016
A6	Reporting to trustees is inaccurate, late or irrelevant.	Inadequate information resulting in poor decision making. / Trustees fail to fulfil their control function. / Board becomes ill informed.	Educational targets and financial budgets are set and agreed in advance. / Report back on main targets direct to Board. / Monitoring against actual is undertaken at committee level. / SDP is reviewed as the year progresses. / Members of Board visit the school "in operation" in order to keep themselves well informed.		HIGH	Executive Headteache/ TBAP Head of Business & Operation	Audit Committees	November 2016

B		STRATEGIC						
RISK No	AREA OF RISK	BRIEF DESCRIPTION OF RISK	BRIEF DESCRIPTION OF CONTROLS	PRIORITY	Risk Likelihood of occurring	RISK OWNER(S)	COMMITTEE RESP	NEXT REVIEW DATE
B1	School places declines significantly	Funding declines and the Trust is unsustainable	The Trust actively promotes its services across all London boroughs. If learner numbers decline from the current 4 local boroughs, the Trust will widen the catchment area to attract new learners from other adjacent boroughs.		MEDIUM	CEO	Trust Board	June 2016
B2	Government funding inadequate to operate Trust as "required" by Trustees, parents or DfE	Savings are made which put at risk quality of teaching: student enrichment is reduced: the fabric of the Trust is neglected.	Trust plans and budgets in detail and in advance to maximise use of available resources and to achieve best value for money.		HIGH	CEO / TBAP Head of Business & Operation	Trust Board	June 2016
B3	Trust buildings destroyed by fire or explosion	The Trust has to close for a short or extended period of time as buildings unusable.	The Trust has a disaster recovery plan in place. / The school's fire systems and the proximity of the closest fire station reduce the risks of losing all of the main building or a number of buildings at once.		MEDIUM	CEO / TBAP Head of Business & Operation	HRFP Committee	September 2016
B4	IT data lost or network access unavailable for a prolonged period	Teaching and learning would be severely impacted. / Finance and many other support tasks would completely stop.	Server and network have been upgraded. / Back up of data is taken regularly and stored separately. / IT is a part of the disaster recovery plan. / Data backed up regularly tested for ability to restore. IT to consider a host solution for critical data.		LOW	Director of IT / Network Manager	HRFP Committee	January 2016

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B5	Trust involved in substantial litigation	The risk is: a. financial if the action is criminal or the activity is not covered by Trust insurance. b. Reputational if the Trust is being sued for an activity that impacts on a number of students and their parents. / Education is becoming more litigious.	The Trust has adequate insurance cover for both legal and actual costs. The management structure is designed to stop individuals making commitment on behalf of the Trust for which they are not qualified. The Financial system has been updated to further strengthen financial accountability.		LOW	CEO	Trust Board	September 2016
B6	Trust enters into inappropriate partnerships or links	The risk is: a. Financial where the Trust is acting as agent for third parties OR where we have an operation which could produce financial loss. b. Reputational where the relationship may be with a business party or organisation that is found to have acted inappropriately	Trust has partnership agreements for those entities where we act as Agent. Legal advice is sought on all partnership agreements.		MEDIUM	CEO / TBAP Head of Business & Operation Manager	Trust Board	January 2017
B7	Substantial financial fraud occurs	The Trust makes a financial loss which is uninsured (over £250K) and reputational loss when exposed in the media. / Minor fraud may be covered financially (insurance) but may lead to major fraud and would sap staff morale.	Trust systems of internal control, financial experience of TBAP Head of Business & Operation Manager . Responsible Officer and External Auditor reviews are designed to minimise the risk. Trust has a whistleblowing policy if staffs are concerned about an individual's actions.		LOW	CEO / TBAP Head of Business & Operation Manager	HRFP Committee	September 2016

C		REPUTATION						
RISK No	AREA OF RISK	BRIEF DESCRIPTION OF RISK	BRIEF DESCRIPTION OF CONTROLS	PRIORITY	Risk Likelihood of occurring	RISK OWNER(S)	COMMITTEE RESP	NEXT REVIEW DATE
C1	School receives unfavourable OfSTED inspection rating	Staff morale is lowered, Trust management is damaged and the balance of reputation moves towards other local schools.	School's self-evaluation form is kept up to date. / School Improvement Partner undertakes regular reviews and related management judgements. / School leadership addresses identified weaknesses or areas less than outstanding./ Teaching staff are trained and coached so that outstanding teaching grade is reality. <i>We have opened a residential site which will be inspected on Care annually.</i> <i>We have two Executive Heads that will further strengthen the SLT.</i>		MEDIUM	CEO	Trust Board	March 2017
C2	School's reputation with school community existing or potential parents and pupils severely declines	Parents and others complain to OfSTED about school's activities. Staff recruitment made harder.	School works hard to maintain good links and reputation with parents through swiftly responding to concerns: Partnership with Parents and Parents Evening provides communication and feedback with parents. / Newsletter and website provide additional information.		LOW	CEO	Trust Board	September 2016

C3	Major scandal involving the CEO	School's reputation damaged when situation exposed by media; Trust management severely disrupted whilst CEO suspended. Financial costs of sorting the problem potentially high. Scandal involving other staff damaging.	Background checks and references and interview process involving a number of Governors, school management and students reduce risks. Good working relationship between Executive Head and Chair of Board and Head and leadership team reduce risk of situation going unnoticed.		LOW	Chair of Board	Trust Board	March 2017
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D								
OPERATIONAL								
RISK No	AREA OF RISK	BRIEF DESCRIPTION OF RISK	BRIEF DESCRIPTION OF CONTROLS	PRIORITY	Risk Likelihood of occurring	RISK OWNER(S)	COMMITTEE RESP	NEXT REVIEW DATE
D1	Child Protection Issues	A student is: Abused in school/ Abused externally without the school picking up warning signs/ Bullied by other students. Students' lives are severely affected and the Trust's reputation or OfSTED grading is reduced.	The Trust's Safeguarding Policy has the names of the designated CP lead at each provision. Annual CP training is delivered to all staff across TBAP where they are trained in identifying physical and mental signs of abuse. Staff recruitment procedures are strong; the Trust maintains up to date Single Central Records of DBS information etc at each provision. Counselling / Therapeutic staff team help to widen the understanding of potential problems and to provide support.		MEDIUM	CEO/	HRFP Committee	March 2017
D2	Staff problems re drink, drugs, social media and safeguarding	Staff become a risk to themselves and their students due to drink or drugs abuse. / Staff has	Staff recruitment procedures ensure references taken up. /Any concerns noted regarding		MEDIUM	CEO/ TBAP Head of Business & Operation Manager	HRFP Committee	March 2017

		inappropriate relationships with students. / Staff partakes in social media exchanges with current students or recent students.	use of drugs / alcohol abuse / inappropriate relationship / social media exchanges are notified to the Exec Head who will immediately implement appropriate procedures to address potential concerns. School's e-safety policy signed by all staff. / Students aware and will also report concerns.					
D3	Health and safety issues	<p>A student, member of staff or visitor sustains an injury (or worse), on site or wherever the Trust has responsibility, and the circumstances could have been foreseen and avoided. As a result, The Trust is deemed negligent.</p> <p>A student claims that they were injured by a member of staff whilst involved in a behaviour incident. The Trust is deemed negligent.</p>	<p>The Trust mitigates these risks by identifying them; Risk assessments are undertaken and all staff are aware that H&S is the responsibility of every member of every individual to ensure all provisions are effectively monitored. / We receive health and safety advice, train staff on specific procedures and have been reviewed annually by an outside expert. An annual review with outside expert evaluation is planned for each provision.</p> <p>All staff as part of their induction are trained in a two day Team Teach techniques, covering de-escalation and safe touch. All staff attend a one day refresher course every year. The Trust has a number of trained trainers as part of the teams as experts who can provide refresher training as</p>		MEDIUM	TBAP Head of Business & Operation Manager	HRFP Committee	September 2016

		Students play sport at school, and sport related injuries can / do occur.	required. All staff are required to operate with the Trust Behaviour policy. Ensure that safe techniques are taught in all PE lessons to reduce the risk of sports related injuries.					
D4	Violent intruder gains access to the school	The intruder harms students or staff.	All provisions have access controlled entry systems. Trust staff all carry TBAP Identity cards with photos on that are checked at entry to each provision.		LOW	TBAP Head of Business & Operation Manager	HRFP Committee	September 2016
D5	Inadequate food hygiene in the canteen	An outbreak of food poisoning occurs affecting students and or staff; the catering operation is closed or action is taken against the Trust.	The LA currently monitors the catering contracts delivered in LBH&F & WCC. Part of that monitoring includes regular inspections and reports on compliance with all aspects of H&S relating to food, and appropriate staff training in Food Hygiene. The kitchens are also inspected without notice by Environmental Health officers to monitor for compliance with appropriate standards.		LOW	Eden / TBAP Head of Business & Operation Manager	HRFP Committee	September 2016
D6	Inappropriate access to internet through Trust's IT network	Students access inappropriate internet sites. / Staff put themselves at risk accessing inappropriate sites.	School has an e-safety policy which all staff is given when they join the staff either as a contracted member of staff or agency. School runs a firewall which filters access to inappropriate sites.		LOW	Director of IT/ Network Manager	HRFP Committee	March 2017
D7	Trust enters into a commercial contract with onerous terms and conditions	A member of staff enters a contract which has substantial long term commercial consequences – for	Procurement Policy in place. Approved suppliers made know to all staff. Staffs are aware that they must not sign up to		MEDIUM	Head of Business & Operation Manager	HRFP Committee	March 2017

		example leasing equipment or committing to long term delivery of a service.	agreements.					
D8	Control is lost with a major building or educational project	Project financially out of control putting Trust at risk.	Purchasing and Procurement policy in place and observed. Fixed price quotes can be obtained. Penalty clauses can be included to ensure work not protracted. Business Manager involved with contractor negotiations. Specialist advice sought with contract tender specifications and project management bought when required		MEDIUM	Head of Business & Operation Manager	HRFP Committee	September 2016
D9	Trust becomes too dependent on one supplier	Supplier crucial to operations but need to have only one supplier to get best prices. /Possible short term disruption.	There are alternative suppliers for nearly all our purchasing. / Head of Business & Operation Manager involved with supplier meetings. / Suppliers are credit checked. Plan is to market test all existing contract when due for renewal / review.		MEDIUM	Head of Business & Operation Manager	HRFP Committee	March 2017
D10	Physical control over Trust assets is inadequate	Valuable equipment is "lost".	All ICT / AV equipment costing over £50 is added to the Asset register when goods are received. Staff sign for all goods distributed after they are recorded on the register. Annual dept audits undertaken to ensure all equipment accounted for.		MEDIUM	Head of Business & Operation Manager	HRFP Committee	September 2017
D11	Employment issues arise.	Contract of employment wrongly drafted. / Salary	New salary calculations approved by HR and		MEDIUM	CEO / Head of Business &	HRFP Committee	June 2016

		underpaid. / Pension contributions not made. / Staff who leave sue for wrongful dismissal.	Finance Manager. Monthly salary Reconciliations done between expected payroll and actual. / Pension returns reconciled. / Specialist Employment advice sought by CEO as and when individual cases / issues present to ensure employment law appropriately implemented and appropriate HR procedures appropriately implemented / followed.			Operation Manager /HR and Finance Manager		
D12	Inappropriate or ineffective staff are employed	Bad recruitment decisions are made and staff cannot be removed easily.	Detailed recruitment procedures followed. /References taken up. / Probationary period reviews implemented.		MEDIUM	CEO/ Head of Business & Operation Manager/HR and Finance Manager	HRFP Committee	March 2017
D13	Trust experiences localised flooding	Danger that facilities not available for students. / Damage done to fabric of building or IT network.	Drains and roofs are monitored on a regular basis. Insurance checked to make sure cover is provided.		MEDIUM	Head of Business & Operation Manager	HRFP Committee	March 2017
D14	Trust experiences power failure	Danger that facilities not available for students as too dark to teach. / Damage done to IT network. / Not possible to heat food/open freezers. / Heating systems will close down.	Trust has a range of UPSs to close down servers without damage. / A long term grid failure would close school.		LOW	Head of Business & Operation Manager	HRFP Committee	September 2016
D15	Trust experiences heating failure	School too cold for students (and staff).	Regular boiler maintenance undertaken.		LOW	Head of Business & Operation Manager	HRFP Committee	September 2016
D16	Trust experiences water supply failure	School would have to close for sanitary reasons.	If major Thames Water issue not able to mitigate.		LOW	Head of Business & Operation Manager	HRFP Committee	September 2016
D17	Maintenance of Trust premises inadequate	Inadequate maintenance of basic infrastructure fabric/systems results in increased longer term	Routine planned maintenance contracts in place for building systems. Six monthly review of room		MEDIUM	Head of Business & Operation Manager	HRFP Committee	September 2016

		costs. Inadequate cosmetic maintenance has the school looking shabby.	condition undertaken to inform planning for annual maintenance and repair work / painting and carpet renewal etc. Capital grants applied for when available.					
D18	Trust's IT systems inadequate	Ineffective teaching and learning environment. / Ineffective administrative environment.	Network recently upgraded/broadband capacity high/daily running reviewed regularly/high quality staff.		LOW	Director of IT/ Network Manager	HRFP Committee	September 2016
D19	Trust policies and systems inadequately documented and communicated	Staff, students and parents do not have access to and are not aware of Trust policies.	Policies on website and regularly reviewed and updated on site when changes approved.		LOW	CEO /Clerk to Governors	All Committees	September 2016

E		FINANCIAL						
RISK No	AREA OF RISK	BRIEF DESCRIPTION OF RISK	BRIEF DESCRIPTION OF CONTROLS	PRIORITY	Risk Likelihood of occurring	RISK OWNER(S)	COMMITTEE RESP	NEXT REVIEW DATE
E1	Poor internal controls and segregation of duties	Unauthorised and inappropriate expenditure may occur, income may not be reported correctly; the risk of financial fraud increases.	Internal controls and finance systems are set out in Finance Policy. Responsible Officer and External Auditor reviews are designed to minimise the risk. Trust has a whistleblowing policy if staffs are concerned about an individual's actions.		LOW	CEO/ Head of Business & Operation Manager	HRFP Committee	March 2017
E2	Poor budgetary control	Expenditure is incurred which is not in line with school management plans. / Risk of total overspends.	School budget set in significant detail. / Budget reports sent to all budget holders. Financial Accountant and Head of Business & Operation Manager monitor budgets regularly.		LOW	Head of Business & Operation Manager	HRFP Committee	September 2016
E3	Poor internal financial reporting	Problems are not identified quickly resulting in management decisions to solve them	Regular monthly reports produced with termly reports going to HRFP Committee and Trust Board.		Medium	Head of Business & Operation Manager	HRFP Committee	June 2016

		being taken later than necessary.						
E4	Failure to build any reserves	Trust unable to deal with the unexpected without disrupting other programmes.	Trust will be looking into best practises to build reserves through performance objectives for SLT which support the trust making year on year savings of 3 to 5%		HIGH	Head of Business & Operation Manager	HRFP Committee	June 2016
E5	Loss making activities	Activities become a drain on resources as opposed to the plan of contributing to the Trust budget elsewhere.	Budgets set to make surpluses and regular monitoring reports reviewed by Head of Business & Operation Manager.		Low	Head of Business & Operation Manager	HRFP Committee	September 2016
E6	Guarantees given to third parties	Trust committed to unauthorised or inappropriate financial risks.	Approved suppliers. / Finance involved with new suppliers. / Staff are aware that they must not sign up to agreements.		MEDIUM	Head of Business & Operation Manager	HRFP Committee	September 2016
E7	LGPS pension commitments increase beyond plan	Trust budget available to use for funding student related expenditure will reduce.	This is a long term issue – there is no short term risk. Monitoring of LGPS position by Head of Business & Operation Manager and governor.		Medium	Head of Business & Operation Manager	HRFP Committee	June 2017

F	COMPLIANCE / BREACH OF STATUTORY RESPONSIBILITY							
RISK No	AREA OF RISK	BRIEF DESCRIPTION OF RISK	BRIEF DESCRIPTION OF CONTROLS	PRIORITY	Risk Likelihood of occurring	RISK OWNER(S)	COMMITTEE RESP	NEXT REVIEW DATE
F1	Freedom of Information	Trust fails to respond to a FOI request on a timely basis.	All such requests go through the CEO.		LOW	CEO	HRFP Committee	March 2017
F2	Data protection	Trust allows sensitive data to become available to become available to	Staff can access SIMS from home so no need to take paper or electronic copies of documents out of the		LOW	Director of IT/ Network Manager	HRFP Committee	March 2017

		unauthorised third parties. / Results in a fine or bad publicity.	building. / Staff sign up to T&C every time they access the system externally. / Third party requests for information validated before response. / Parents agree to photos (unnamed) being used by school.					
F3	Copyright / licence	Trust not signed up to appropriate licensing agencies. / Trust sued by agency for back fees.	The TRUST covers all copyright agencies that it is aware of and has in place a copyright policy to inform staff of their responsibilities.		LOW	Head of Business & Operation Manager	HRFP Committee	June 2016
F4	PAYE breach	PAYE audit uncovers missed or inaccurate returns / tax payments. Resulting in back payments and fines.	Payroll providers are aware of requirements. / PAYE specialist has given advice on requirements.		LOW	Head of Business & Operation Manager	HRFP Committee	June 2016
F5	VAT breach	VAT audit uncovers missed or inaccurate returns / tax payments. Resulting in back payments and fines.	Finance Officer aware of requirements. / VAT specialist has given advice on requirements.		LOW	Head of Business & Operation Manager	HRFP Committee	June 2016
F6	Pension regulations	TPS or LGPS audit uncovers missed or inaccurate returns / missing contribution payments resulting in back payments and fines.	Payroll providers are aware of requirements. / Auditors review as part of audit and audit TPS return.		MEDIUM	Head of Business & Operation Manager /HR and Finance Manager	HRFP Committee	June 2016
F7	Corporation Tax	Trust fails to report CT correctly resulting in back payments and fines.	CT registration all in place and agreement that Trust currently is not liable for CT. registered as Charity.		LOW	Clerk to Govs/ Head of Business & Operation Manager	HRFP Committee	June 2016

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F8	Financial Statements Filing	Trust fails to file accounts on time at Companies House. No risk to Trust as it is directors who are fined.	The Trusts appointed Auditors will monitor the log of accounts to ensure compliance.		LOW	Clerk to Govs/ Head of Business & Operation Manager	HRFP Committee	November 2016
F9	Planning and Building Regulations	Trust fails to apply for and receive planning permission or building regulation approval as appropriate. The Trust could have to demolish a building or undertake retrospective work on a project.	The Bridge AP Academy building is leased from the LA for 7 years. Building projects all under control of Head of Business & Operation Manager Specialist advice sought at all times regarding planning permission requirements.		High	Head of Business & Operation Manager	HRFP Committee	September 2016
F11	Funding agreement with DfE	Trust fails to keep to funding agreement with EFA: risk losing funding or removal by EFA of Trust status or removal by EFA of current trustees.	Funding agreement reviewed annually by HRFP Committee		LOW	Head of Business & Operation Manager	Trust Board	March 2017
F12	Equal opportunities legislation	Trust fails to meet equal opportunity legislation requirements and is subject to legal action by a third party.	Equality legislation and Trust actions monitored by The TBAP Trust Board		MEDIUM	Head of Business & Operation Manager	HRFP Committee	March 2017