



## Board of Governors of the City of London School for Girls

**Date:** WEDNESDAY, 4 FEBRUARY 2015  
**Time:** 11.00 am  
**Venue:** CITY OF LONDON SCHOOL FOR GIRLS - ST GILES TERRACE,  
BARBICAN, EC2Y 8BB

**Members:** Sir Michael Snyder (Chairman)  
Clare James (Deputy Chairman)  
Nicholas Bensted-Smith  
Professor John Betteridge (External Member)  
Nigel Challis  
Dennis Cotgrove  
Emma Edhem  
Dr. Stephanie Ellington (External Member)  
Stuart Fraser (Ex-Officio Member)  
Christopher Hayward  
Tom Hoffman  
Ann Holmes  
Alderman Vincent Keaveny  
Sylvia Moys  
Elizabeth Phillips (External Member)  
Deputy Richard Regan  
Mary Robey (External Member)  
Virginia Rounding  
Alderman William Russell  
Richard Sermon (External Member)  
Deputy Dr Giles Shilson (Ex-Officio Member)

**enquiries:** **Jacqui Daniels**  
tel. no.: 020 7332 1480  
[jacqui.daniels@cityoflondon.gov.uk](mailto:jacqui.daniels@cityoflondon.gov.uk)

Lunch will be served at the School at 1pm  
**NB: Part of this meeting could be the subject of audio video recording**

**John Barradell**  
Town Clerk and Chief Executive

# AGENDA

## Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**  
To agree the public minutes and non-public summary of the meeting held on 5 December 2014.  

**For Decision**  
(Pages 1 - 4)
4. **REPORT OF THE HEADMISTRESS**  
Report of the Headmistress of the City of London School for Girls.  

**For Decision**  
(Pages 5 - 20)
5. **RISK MANAGEMENT STRATEGY**  
Report of the Chamberlain.  

**For Information**  
(Pages 21 - 56)
6. **ACTION TAKEN UNDER URGENCY PROCEDURES**  
Report of the Town Clerk.  

**For Information**  
(Pages 57 - 58)
7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
9. **EXCLUSION OF THE PUBLIC**  
**MOTION** - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

## Part 2 - Non-Public Agenda

10. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 5 December 2014.

**For Decision**  
(Pages 59 - 62)

11. **REPORT OF THE HEADMISTRESS**

Report of the Headmistress of the City of London School for Girls.

**For Decision**  
(Pages 63 - 84)

12. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

This page is intentionally left blank

## BOARD OF GOVERNORS OF THE CITY OF LONDON SCHOOL FOR GIRLS Friday, 5 December 2014

Minutes of the meeting of the Board of Governors of the City of London School for Girls held at Committee Room - 2nd Floor West Wing, Guildhall on Friday, 5 December 2014 at 11.30 am

### Members:

Sir Michael Snyder (Chairman)	Alderman Vincent Keaveny
Clare James (Deputy Chairman)	Sylvia Moys
Nicholas Bensted-Smith	Deputy Richard Regan OBE
Nigel Challis	Mary Robey (External Member)
Dennis Cotgrove	Virginia Rounding
Emma Edhem	Alderman William Russell
Christopher Hayward	Richard Sermon (External Member)
Ann Holmes	Deputy Dr Giles Shilson (Ex-Officio Member)

### Officers:

Jacqui Daniels	Town Clerk's Department
Sarah Port	Chamberlain's Department
Ena Harrop	Headmistress, City of London School for Girls
Andrew Douglas	Deputy Head, City of London School for Girls
Ned Yorke	Bursar, City of London School for Girls

### 1. APOLOGIES

Apologies for absence were received from Professor John Betteridge, Dr Stephanie Ellington, Tom Hoffman and Elizabeth Phillips.

### New Members

The Chairman welcomed Emma Edhem and Chris Hayward to their first meetings of the Board, following their appointment by the Court of Common Council the previous day.

### 2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations.

### 3. MINUTES

**RESOLVED** – That the minutes of the meeting held on 17 October 2014 be approved as a correct record, subject to the apologies of Nicholas Bensted-Smith being noted.

### Matters Arising

**Bursary Fund – 2013/14 Report and Financial Statements** The Deputy Chairman referred to her query at the previous meeting concerning the apparent low rate of return on investments and she reported that she had

discovered that the figure of 3.78% related to the dividend yield and the total return was, in fact, 11.7%.

4. **APPOINTMENT OF A MEMBER TO THE BURSARY COMMITTEE**

The Board considered the appointment of a Member to the Bursary Committee for the remainder of the municipal year 2014/15 in the room of The Revd. Dr Martin Dudley.

**RESOLVED** – That Nicholas Bensted-Smith be appointed to the Bursary Committee for the remainder of 2014/15.

5. **TERMS OF REFERENCE AND FREQUENCY OF MEETINGS OF THE BOARD OF GOVERNORS OF THE CITY OF LONDON SCHOOL FOR GIRLS**

A report of the Town Clerk was considered which requested that Governors review the Board's Terms of Reference and the frequency of its meetings.

**RESOLVED** – That the terms of reference of the Board of Governors of the City of London School for Girls be approved for submission to the Court of Common Council in April 2015 and that the current frequency of Board meetings be confirmed.

6. **RE-APPOINTMENT OF A CO-OPTED GOVERNOR**

The Board received a report of the Town Clerk regarding the re-appointment of Professor John Betteridge as a co-opted Governor for a further three year term on the Board.

The Chairman expressed his support for Professor Betteridge's re-appointment and he informed the Board of the invaluable advice and assistance the Professor provided to the pupils.

**RESOLVED** – That Professor John Betteridge be re-appointed as a co-opted Governor for a further three year term.

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

**1) Public and Non-Public Reports**

In answer to a Governor's question, the Town Clerk explained that the decision on whether a report should be considered in public or not was guided by recommendations from report authors. That said, she stated that reports were considered in public unless they contained information as defined by Schedule 12A of the Local Government Act 1972 and most often this was as a result of the report containing sensitive information relating to an individual (paragraph 1) or information relating to the financial or business affairs of a particular person (paragraph 3). She explained that 'person' in this sense meant a legal person, which could be an individual or a legally constituted organisation.

**2) School Productions**

A Governor enquired whether her fellow Governors had had the opportunity to attend any of the School's recent productions and also those which had been undertaken in association with the Boy's School. She praised the staff and girls

on the excellent productions and encouraged Members to attend such events in future.

### **3) Past Pupil**

A Governor referred to a recent Alumnus of the School who had read the first lesson at a recent event at the Inn-holders' Hall and he reported that she had been a credit to the School.

#### **8. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

The Chairman approved that the following item may be reported to the Board for their information.

#### **Child Protection and Safeguarding Policy**

The Town Clerk reported action taken under urgency procedures reviewing and approving a revised City of London School for Girls Child Protection and Safeguarding Policy and noting that the Disciplinary Procedure for all staff had been amended to make specific reference to safeguarding.

#### **RECEIVED.**

#### **9. EXCLUSION OF THE PUBLIC**

**RESOLVED** - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act 1972 as follows:-

Item No.	Exempt Paragraphs
10	1, 2, 3 and 4
11, 12	3
13, 14	1 and 3
15	3

#### **10. NON-PUBLIC MINUTES**

The minutes of the meeting held on the 17 October 2014 were approved as an accurate record.

#### **11. PRESENTATION FROM THE HEAD OF SENIOR SCHOOL REGARDING BRITISH VALUES IN THE CURRICULUM**

The Board received a detailed presentation from Susie Gilham, the Head of the Senior School which provided the Board with information concerning the teaching of British values within the curriculum.

#### **12. PRESENTATION FROM THE MARKETING OFFICER REGARDING MARKETING AT THE CITY OF LONDON SCHOOL FOR GIRLS**

The Board received a presentation from Jos Jones, the Marketing Officer which provided information on marketing activities at the School's.

#### **13. REPORT OF THE HEADMISTRESS**

The Board considered a report of the Headmistress concerning the time allowance for heads of department in the School.

14. **PROPOSED 2015/16 REVENUE BUDGET**

A joint report of the Chamberlain and the Headmistress was presented and approved by the Board reviewing the proposed 2015/16 revenue budget and, subject to the decisions of the Board, subsequent submission to the Finance Committee.

15. **REPAIRS, MAINTENANCE, IMPROVEMENTS AND MAJOR WORKS FUND**

The Board considered and approved a joint report of the Chamberlain, the Headmistress and the City Surveyor providing an updated projection of the cost of works to be met from the Repairs, Maintenance, Improvements and Major Works Fund over the next 21 years.

16. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

**Andrew Douglas, Deputy Head of the City of London School for Girls**

In answer to a question, the Chairman paid tribute to the long and distinguished service given to the School by Andrew Douglas, the Deputy Head at the School who would shortly be retiring.

17. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There were no urgent items.

**The meeting ended at 1.00 pm**

-----  
Chairman

**Contact Officer: Jacqui Daniels**  
**tel. no.: 020 7332 1480**  
**[jacqui.daniels@cityoflondon.gov.uk](mailto:jacqui.daniels@cityoflondon.gov.uk)**



<b>Committee:</b> Board of Governors of the City of London School for Girls	<b>Date:</b> 4 <sup>th</sup> February 2015	<b>Item no:</b>
<b>Report of:</b>  The Headmistress	<b>Public:</b>	
	<b>For Decision</b>	
<b><u>Summary</u></b>		
It is <b>recommended</b> that the contents of the report be noted and that the Board approve the Pupil & Parent Data Protection Policy (Revised January 2015) at Annex B.		

### **Forthcoming Events for Remainder of Spring Term**

- |    |  |  |
|----|--|--|
| 1. | 5 <sup>th</sup> February                     | Year 7 Concert   |
|    | 9 <sup>th</sup> February                     | Spanish Film Evening   |
|    | 10 <sup>th</sup> February                    | Parents information evening: approaches to teaching and learning at CLSG |
|    | 11 <sup>th</sup> February                    | Sing and Swing Concert   |
|    | 16 <sup>th</sup> - 20 <sup>th</sup> February | Half Term  |
|    | 26 <sup>th</sup> February                    | Year 13 Parents' Evening   |
|    | 27 <sup>th</sup> February                    | Lunchtime Concert  |
|    | 4 <sup>th</sup> March                        | Colton Memorial Lecture  |
|    | 4 <sup>th</sup> March                        | Sixth Form Concert   |
|    | 5 <sup>th</sup> March                        | Prep Parents' Evening  |
|    | 5 <sup>th</sup> March                        | International University Fair  |
|    | 6 <sup>th</sup> March                        | Staff INSET – school starts at 10.30am                                   |
|    | 12 <sup>th</sup> March                       | Prep Parents' Breakfast and Poetry Performance                           |
|    | 12 <sup>th</sup> - 13 <sup>th</sup> March    | AS/A2 Music Controlled assessments                                       |
|    | 15 <sup>th</sup> March                       | Bronze and Silver DofE training day in school                            |
|    | 16 <sup>th</sup> – 19 <sup>th</sup> March    | A-level Theatre Studies Performances TBC                                 |
|    | 17 <sup>th</sup> March                       | Joint Concert with CLS at CLS  |
|    | 18 <sup>th</sup> March                       | Head Girl and Deputy Head Girl Hustling                                  |
|    | 18 <sup>th</sup> March                       | Whole School Photo   |
|    | 19 <sup>th</sup> March                       | Year 8 Parents' Evening  |
|    | 23 <sup>rd</sup> – 26 <sup>th</sup> March    | Year 11 GCSE Drama performances  |
|    | 24 <sup>th</sup> March                       | Chairman's Dinner (Tallow Chandlers Hall)                                |
|    | 25 <sup>th</sup> March                       | Prep Spring Concert & Art Exhibition                                     |
|    | 27 <sup>th</sup> March                       | House Music competition  |
|    | 27 <sup>th</sup> March                       | Term ends  |

### **Educational Visits**

- |    |   |   |
|----|---|---|
| 2. | 31 <sup>st</sup> Jan. – 14 <sup>th</sup> Feb. | Year 9 de la Salle Immersion Exchange   |
|    | 9 <sup>th</sup> – 12 <sup>th</sup> February   | U2 French trip                          |
|    | 10 <sup>th</sup> – 12 <sup>th</sup> February  | Year 13 CERN trip                       |
|    | 12 <sup>th</sup> – 15 <sup>th</sup> February  | Year 7 Geography/Classics trip to Italy |
|    | 12 <sup>th</sup> – 16 <sup>th</sup> February  | Year 10 – 13 Classics trip to Greece    |
|    | 12 <sup>th</sup> – 17 <sup>th</sup> February  | Salamanca Trip                          |
|    | 13 <sup>th</sup> – 21 <sup>st</sup> February  | Ski Trip                                |

10 <sup>th</sup> March	Year 8 Hampton Court visit
14 <sup>th</sup> – 28 <sup>th</sup> March	Year 9 de la Salle Immersion Exchange
27 <sup>th</sup> – 30 <sup>th</sup> March	GCSE Berlin Trip
20 <sup>th</sup> – 22 <sup>nd</sup> April	Silver DofE practice expedition
24 <sup>th</sup> – 27 <sup>th</sup> April	Year 8 Barcelona trip
25 <sup>th</sup> – 26 <sup>th</sup> April	Bronze DofE practice expedition
1 <sup>st</sup> May	L2 visit to the Ragged School Museum
7 <sup>th</sup> – 8 <sup>th</sup> May	L2 overnight trip to Historic Chatham Dockyard
7 <sup>th</sup> – 13 <sup>th</sup> May	Year 10 German exchange (CLSG to AVG)
17 <sup>th</sup> – 18 <sup>th</sup> June	Euro Disney Tour
19 <sup>th</sup> – 23 <sup>rd</sup> June	Year 8 Normandy trip
19 <sup>th</sup> – 25 <sup>th</sup> June	Year 10 German exchange (AVG in CLSG)
20 <sup>th</sup> – 21 <sup>st</sup> June	Bronze DofE qualifying expedition
27 <sup>th</sup> June – 2 <sup>nd</sup> July	Biology A-level field trip
3 <sup>rd</sup> July	Year 10 celebration trip
3 <sup>rd</sup> – 5 <sup>th</sup> July	Silver DofE qualifying expedition
10 <sup>th</sup> – 13 <sup>th</sup> July	Skern Lodge trip

### **Governors' Visiting Days**

3. Staff and pupils are always very pleased to welcome Governors to spend a day in school, either attending lessons in a particular subject or else shadowing a particular year group.

If any Governor would like to spend a day in school, he or she is asked to contact the Deputy Head (Pastoral) at the school to discuss dates and the desired programme.

### **Health & Safety**

4. A fire/emergency evacuation drill will take place before half term. Minutes of the recent Health and Safety Committee Meeting are attached at Annex A.

### **Lettings**

<b>5. Hirer</b>	<b>Dates</b>	<b>Venue</b>
Barbican Association	24th Feb	Main Hall
BBC Singers	10th Feb	Main Hall
Chelsea Opera Group	18th, 19th, 22nd Feb	Main Hall
City of London Police Cadets	20th Jan, 10th Feb, 3rd Mar & 14th Apr	Lecture Theatre
Crossrail	21st Jan	Committee Room
Geen Spirit	14th Mar	Main Hall
Justin Craig Education	2 <sup>nd</sup> , 4th, 17th Jan, 14th Feb, 14th 28th, 29th 30th 31st Mar 1st, 2nd Apr	B Floor Classrooms New Hall & Music Rooms
London Gay Men's Choir	19th, 26th Jan 7th, 10th, 14th, 28th Jan, 4th,	New Hall
London Philharmonic Choir	25th Mar, 15th Apr	New Hall
London Symphony Chorus	6th, 7th Jan,	New Hall

### **Regular Hirers**

3S Swim School	Every Sunday	Swimming Pool
Barbican Lawn Tennis Club	Various Evenings	Tennis Courts
Global Harvesters Fellowship	Every Sunday	Main Hall or New Hall
Go Mammoth	Every Monday - Thursday Evenings	Gymnasium
NANUK Swimming	Every Thursday & Saturday	Swimming Pool
Otter Swimming Club	Every Wednesday	Swimming Pool
Royal Choral Society	Every Monday & 1st Apr	Main Hall
Tri for Fitness	Every Monday & Tuesday	Swimming Pool

### **Gymnasium Extension Project Update**

#### **7. a. Swimming Pool**

The pool is now back in use with all necessary approvals received.

#### **b. Gymnasium Extension**

The City Surveyor anticipates that work to the extended plant enclosure will be completed with all services fully operational by the end of February. We are therefore continuing with our plans to introduce the new facility into the timetable from the Summer Term 2015. We have been offered £30,000 towards the cost of the project. Full details are given in the Non-Public Report.

### **Pupil & Parent Data Protection Policy**

8. The Board last approved this policy in July 2009. The City of London Corporation is the data controller for the three City schools and GSMD. The Town Clerk's Information Officer has recently issued a revised policy after consultation with the schools with changes that are minor in detail covering such matters as scope, nomenclature and cross-reference correction. It is **recommended** that the Board approves the revised version of the policy attached at Annex B.

### **List of Annexes:**

- Annex A: Health and Safety Minutes  
Annex B: Pupil and Parent Data Protection Policy

Background Papers:  
None

Contact:  
Ned Yorke  
020-7847-5524  
[bursar@clsq.org.uk](mailto:bursar@clsq.org.uk)

This page is intentionally left blank

**City of London School for Girls**  
**Health & Safety Committee Minutes**  
**Meeting Held on Monday 5<sup>th</sup> January 2015**

**Present:** Ned Yorke (Chairman), Jason Valentine (H&S Coordinator), Ena Harrop, Mary Robey, James Cunningham, Neil Codd, Jane Curtis, Maggie Donnelly, Kerry Dignan, Carolyn Cole, David Libby, Sharon McCarthy, Caroline Castell, Andy Hill, Kirsty Packer, Jane Rogers, Mark Wilkinson, Geraldine Walshe, Vicky Pyke (Secretary)

**Item 1 Apologies**

None

**Item 2 Previous Minutes**

Minutes of the 1<sup>st</sup> September 2014 were approved.

**Item 3 Matters Arising**

**H& Safety Policy and Risk Assessment Policy**

The Board of Governors have approved the new Health and Safety Policy and Risk Assessment Policy. NY asked the Committee if they could please read through and familiarise themselves with them.

**Contingency Plan – Off Site Address List**

NY advised that this was now in hand.

**Contingency Plan - Appointed SMT for Staff**

NY advised that a member of the SMT will be appointed to liaise and assist staff in the event of an emergency.

**Item 4 Health and Safety Assurance Inspections**

JV advised that all inspections carried out in 2014 were complete. He advised of the new inspection dates for 2015 and invited CTA to attend.

The Dates for 2015 Inspections are:

30<sup>th</sup> January 2015  
27<sup>th</sup> March 2015  
3<sup>rd</sup> July 2015  
4<sup>th</sup> December 2015

**Item 5 Radiation Audit**

MW gave a brief overview. He advised that a Radiation Protection Officer has now been recruited and that a Radiation Protection Advisor was being recruited through the Corporation. MW advised that there was some radioactive waste on site and that the RPO will now dispose of this. He also advised that the RPO will work closely with

MW and will provide monthly checks and audits.

**Item 6 Recruitment of School Nurse**

VP advised that we now have a long term temporary school nurse covering until the recruitment of a full time school nurse is complete. VP advised that all the necessary paperwork has been drawn up and we are now recruiting.

**Item 7 Health & Safety Policy**

It has now been agreed that all 3 schools have their own H&S policy. The CLSG version was approved by the Board at its October meeting.

**Item 8 Any Other Business**

**Fire Drill**

NY asked CTA to take on this task and organise dates. JR and NY advised that a personal emergency evacuation plan needs to be drawn up for a current prep student.

**Item 9 Next Meeting**

Monday 20<sup>th</sup> April 2015

DRAFT

## **PUPIL & PARENT DATA PROTECTION POLICY**

### **General Statement of the Duties of the CLFS, CLS and CLSG**

1. The City of London Corporation ('the City') is the data controller for the City of London Freeman's School ('the CLFS'), the City of London School ('the CLS'), the City of London School for Girls ('the CLSG') and the Guildhall Young Artists Division ('Junior Guildhall & Centre for Young Musicians') of the Guildhall School of Music & Drama. This Policy applies to personal information held and processed by the CLFS, the CLS, CLSG and Junior Guildhall & Centre for Young Musicians, and may collectively refer to them as 'the School/s' in light of their common obligations under this Policy. References to the 'Bursar' in this Policy should, in respect of the CLS, be read as reference to the Head of IT & Computing, and, in the case of Junior Guildhall, the Head of Junior Guildhall.
2. The City, and the Schools, are required to process personal data regarding pupils, their parents and guardians as part of their operation, and shall take all reasonable steps to do so in accordance with this Policy and the Data Protection Act 1998 ('the DPA'). The City aims to have transparent systems for holding and processing written personal data. Any reference to personal data in this Policy includes reference to sensitive personal data. Processing may include obtaining, recording, holding, disclosing, destroying or otherwise using data.
3. Any individual is entitled to request access to information relating to their personal data held by the schools. In this Policy any reference to pupils includes current, past or prospective pupils.

### **The Data Protection Act 1998**

4. The City, and therefore each of the Schools, has the responsibility to comply with the DPA.
5. The DPA applies to information relating to both "personal" and "sensitive personal" data.
6. **Personal Data** is defined in the DPA as information relating to and identifying a living individual ("data subject"). The Schools may process a wide range of personal data of pupils, their parents or guardians, as part of their operation. To qualify as personal data, the data must be biographical in a significant sense, having the data subject as its focus and affecting the data subject's privacy. Personal data includes facts, any expression of opinion about an individual and any indication of the intentions of anyone in respect of that individual. Examples of personal data are: names and addresses; bank details; academic, disciplinary, admissions and attendance records; references; and examination scripts and marks.
7. **Sensitive Personal Data** is a sub-category of personal data and is defined in the DPA as information in respect of racial or ethnic origin, political opinions, religious beliefs or

"other beliefs of a similar nature", membership of a trade union, physical or mental health, sexual life, criminal convictions and alleged offences.

8. In order to comply with the DPA the Schools must comply with the eight Data Protection Principles which state that personal data must be:
  - (a) processed fairly and lawfully;
  - (b) obtained only for one or more specified and lawful purposes;
  - (c) adequate, relevant and not excessive;
  - (d) accurate;
  - (e) not kept longer than is necessary;
  - (f) processed in accordance with the individual's rights under the DPA;
  - (g) kept secure; and
  - (h) not transferred to countries outside the European Economic Area unless there is adequate protection to the individual in relation to processing.
  
9. **Processing** includes obtaining, holding, recording, adding, deleting, augmenting, disclosing, destroying, printing or otherwise using data.

#### **Processing of Personal Data**

10. Consent may be required for the processing of personal data unless the processing is necessary for the Schools to undertake their obligations to pupils and their parents or guardians. Personal data, unless otherwise exempt from restrictions on processing under the DPA, will only be disclosed to third parties under the terms of this Policy or otherwise with the consent of the appropriate individual.
  
11. The rights in relation to personal data set out under the DPA are those of the individual to whom the data relates. The Schools will, in most cases, rely on parental or guardian consent to process data relating to pupils unless, given the nature of the processing in question, and the pupil's age and understanding, it is unreasonable in all the circumstances to rely on the parent or guardian's consent. Parents should be aware that in such situations they may not be consulted.

#### **Exemptions which Allow Disclosure of Personal Data to Third Parties**

12. There are a number of exemptions in the DPA which allow disclosure of personal data to third parties, and the processing of personal data by the School and its employees, which would otherwise be prohibited under the DPA. The majority of these exemptions only allow disclosure and processing of personal data where specific conditions are met, namely:
  - (a) the data subjects have given their consent (with regard to sensitive personal data, this may require explicit, written consent, depending on the circumstances);
  - (b) for the prevention or detection of crime;
  - (c) for the assessment of any tax or duty;
  - (d) where it is necessary to exercise a right or obligation conferred or imposed by law upon the City or the Schools (other than an obligation imposed by contract);



- (e) for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings);
- (f) for the purpose of obtaining legal advice; and
- (g) for research, historical and statistical purposes (so long as this neither supports decisions in relation to individuals, nor causes substantial damage or distress).

### **Use of Personal Information by the Schools**

13. It is required under the DPA that the personal data held about pupils must only be used for specific purposes allowed by law. The School holds personal data on pupils. The personal data includes contact details, assessment/examination results, attendance information, characteristics such as ethnic group, special educational needs, any relevant medical information, and photographs.
14. The data is used in order to support the education of the pupils, to monitor and report on their progress, to provide appropriate pastoral care, and to assess how well the school as a whole is doing, together with any other uses normally associated with this provision in an independent school environment.
15. The School may make use of limited personal data (such as contact details) relating to pupils, their parents or guardians for fundraising, marketing or promotional purposes and to maintain relationships with pupils of the School.
16. In particular, the School may:
  - (a) transfer information to any association, society or club set up for the purpose of maintaining contact with pupils or for fundraising, marketing or promotional purposes relating to the School;
  - (b) make use of photographs of pupils in School publications and on the School website;
  - (c) disclose photographs and names of pupils to the media (or allow the media to take photographs of pupils) for promotional and congratulatory purposes where a pupil may be identified by name when the photograph is published e.g. where a pupil has won an award or has otherwise excelled;
  - (d) make personal data, including sensitive personal data, available to staff for planning curricular or extra curricular activities;
  - (e) keep the pupil's previous school informed of his/her academic progress and achievements e.g. sending a copy of the school reports for the pupil's first year at the school to his/her previous school.
17. Photographs with names identifying pupils will not be published on the School website without the express permission of the appropriate individual.
18. Any wish to limit or object to any use of personal data should be notified to the Bursar of the relevant School in writing, which notice will be acknowledged by the School in writing. Parents who do not want their child's photograph or image to appear in any of the School's promotional material, or be otherwise published, must also make sure their child knows this.

19. Pupils, parents and guardians should be aware that where photographs or other image recordings are taken by family members or friends for personal use the DPA will not apply e.g. where a parent takes a photograph of their child and some friends taking part in the School sports day.

### **Disclosure of Personal Data to Third Parties**

20. The School may receive requests from third parties (i.e. those other than the data subject, the School, and employees of the School) to disclose personal data it holds about pupils, their parents or guardians. This information will not generally be disclosed unless one of the specific exemptions under the DPA which allows disclosure applies (see paragraph 12); or where necessary for the legitimate interests of the individual concerned or the School.
21. The following are the most usual reasons that the School may have for passing personal data to third parties:
  - (a) to give a confidential reference relating to a pupil;
  - (b) to give information relating to outstanding fees or payment history to any educational institution which it is proposed that the pupil may attend;
  - (c) to publish the results of public examinations or other achievements of pupils of the School;
  - (d) to disclose details of a pupil's medical condition where it is in the pupil's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
  - (e) to provide information to another educational establishment to which a pupil is transferring;
  - (f) to provide information to the Examination Authority as part of the examinations process; and
  - (g) to provide information to the relevant Government Department concerned with national education. At the time of the writing of this Policy, the government Department concerned with national education is the Department for Education (DfE). The Examination Authority may also pass information to the DfE.
22. The DfE uses information about pupils for statistical purposes, to evaluate and develop education policy and to monitor the performance of the nation's education service as a whole. The statistics are used in such a way that individual pupils cannot be identified from them. On occasion the DfE may share the personal data with other Government departments or agencies strictly for statistical or research purposes.
23. Any wish to limit or object to any use of personal data by third parties, except as stated in paragraph 21 above, should be notified to the Bursar of the relevant School in writing, or to the relevant authority (the contact details for which can be supplied by the School).
24. Where the School receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure.

### **Accuracy of Personal Data**

25. The City and the Schools will endeavour to ensure that all personal data held in relation to an individual is accurate. Individuals must notify the relevant School's Bursar in writing of any changes to information held about them. An individual has the right to request that inaccurate information about them is erased or corrected.

### **Security of Personal Data**

26. The City and the Schools will take reasonable steps to ensure that members of staff will only have access to personal data relating to pupils, their parents or guardians where it is necessary for them to do so. All staff will be made aware of this Policy and their duties under the DPA. The City and the Schools will take all reasonable steps to ensure that all personal information is held securely and is not accessible to unauthorised persons.

### **Retention of Personal Data**

27. The Schools will have retention policies in place to ensure that personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

### **Rights of Access by Data Subjects to their Personal Data**

28. Under the DPA, individuals have a right of access to their personal data held by the City and the Schools. This is known as a "subject access request" and is subject to exemptions and constraints within the DPA. Any request in writing will be responded to as long as the appropriate fee is paid, satisfactory identification is given and the information request is clear. If these requirements are satisfied the Schools' *Personal Data Request Form* need not be completed.

### **Requests for Access to Records (Subject Access Requests)**

29. A subject access request must be made in writing. Where the request is not complete or clear, the fee has not been paid, or satisfactory identification has not been given, a *Personal Data Request Form* must be sent to the individual concerned within **two** working days of when the request is received by the School.
30. All requests for access to records must be placed on the relevant pupil's file, and the City's Data Protection Officer (who at the time of writing is the Information Officer in the Town Clerks' Department) informed that the request has been received.

### **Responding to Requests for Access to Records**

31. All requests for access to records must be passed to the Bursar of the relevant School.
32. The Head/Headmaster/Headmistress or, in his/her absence, the Bursar must authorise the applicant's request for access before **any** information is disclosed (see also paragraphs 38-42 below).

33. The Schools may also wish to get advice from the Information Officer or the Comptroller and City Solicitor in relation to disclosure.
34. A written response acknowledging the application form must be sent to the applicant within **5 working days** of the request.
35. The DPA requires a response to a request to be given within **40 calendar days** of the written request being received. The 40 day period does not begin until:
  - (a) a written application is received by anyone within the City of London Corporation (not when it has been passed on to and received by the Head/Headmaster/Headmistress, Bursar, City's Information Officer or the Comptroller and City Solicitor);
  - (b) the School has received sufficient information to enable it to identify the individual who is seeking access;
  - (c) the School has received sufficient information to enable it to access the information requested; and
  - (d) where applicable the fee of £10 has been received, unless otherwise waived at the School's discretion.
36. Where the conditions set out in paragraph 35 are fulfilled, in responding to the request, the School must confirm whether personal data is being processed and where that is the case, give a description of the personal data that is being processed, the purposes for which the personal data is being processed, and the persons to whom the personal data are or may be disclosed. The School must also provide, in an intelligible form, a copy of the information held and, where possible, details of the source of the information. Finally, where processing results in automated decision making which evaluates matters relating to the data subject (for example, in the marking of multiple choice questions), the data subject should be informed and informed also of the logic involved in that decision-making.
37. Data subjects are not entitled to information where exemptions to the right of access apply (see paragraphs 55-59 below). Moreover, in these circumstances, the School must only give a notification to the data subject that no information has been identified which is required to be supplied under the DPA.

#### **Authorisation of Access to Records on Behalf of a Child or Young Person**

38. A child or young person may appoint a person with parental responsibility for him or her to request access to their records. In such circumstances the School must have written evidence that the child or young person has authorised the person with parental responsibility to make the application.
39. The Head/Headmaster/Headmistress or, in his/her absence, the Bursar will determine what information will be shared with the person with parental responsibility. Access to records will be refused in instances where, for example, information sharing may place a child at risk of significant harm or jeopardise police investigations into any alleged offence(s).

40. Where a child or young person does **not** have sufficient understanding to make his or her own request, a person with parental responsibility can make a request on their behalf. The Head/Headmaster/Headmistress or, in his/her absence, the Bursar must, however, be satisfied that:
- (a) the child or young person lacks sufficient understanding; and
  - (b) the request made on behalf of the child or young person is in their interests.
41. The School will only grant to pupils access to their personal data if, in the relevant School's reasonable belief, the pupil understands the nature of the request. It is generally accepted that, by the age of 12, a child can be expected to have sufficient maturity to understand the nature of the request.
42. Where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents or guardian, the School will maintain confidentiality unless it has reasonable grounds to believe that the pupil does not fully understand the consequences of withholding their consent, or where the School believes disclosure will be in the best interests of the pupil or other pupils.

### **Disclosure of Information**

43. Any individual is, subject to exemptions and constraints within the DPA, entitled to have access to all information specifically held about him or her where:
- (a) it is automated data being personal data held or processed electronically, for example, on a computer, word processor, audio and video system or telephone logging system;
  - (b) it is manual data which consists of non-automated information such as paper or microfiche files or records, which record information as part of a relevant filing system. A relevant filing system is defined as a set of information relating to individuals and structured either by reference to individuals or specific criteria relating to those individuals, so that specific information relating to a particular individual is readily accessible in a way broadly equivalent to information accessed within a computerised system.
44. The personal data must be provided in permanent form (e.g. paper, microfiche, CCTV images) unless:
- (a) the supply of such a copy is not possible;
  - (b) supplying it in permanent form would involve disproportionate effort (in which case another way of viewing the data must be agreed with the applicant); or
  - (c) the data subject agrees otherwise.
45. Only relevant documents from the pupil's file will be duplicated and disclosed to the applicant who, if requested, should be given a copy of the duplicated document.
46. An individual is not entitled to information where:
- (a) exemptions to the right of access apply (see paragraphs 55-59 below); or

- (b) another person, including any family member, has not given their written consent to disclose information that identifies them (**but** see paragraph 48 below) .
47. Information contained in an individual's records is likely to contain information about persons other than the individual. Generally, information about or identifying another person must not be disclosed to the individual seeking access to the information without that person's written consent.
48. There may be circumstances where the Head/Headmaster/Headmistress or, in his/her absence, the Bursar considers it *reasonable in all the circumstances* to disclose information without the consent of the other person. For example, when the person cannot be traced.
49. In determining what is reasonable in all the circumstances it is necessary to have regard to:
- (a) any duty of confidentiality owed to the other person;
  - (b) any steps taken with a view to seeking consent of the other person to the disclosure;
  - (c) whether the other person is capable of giving consent; and
  - (d) any express refusal of consent by the other person.
50. In instances where the Head/Headmaster/Headmistress or, in his/her absence, the Bursar have decided information concerning other people, or their identities, may not be disclosed, it is acceptable to blank out the relevant information.
51. There is also a general presumption in favour of disclosing personal data relating to employees, where this information is integral to the personal data of the applicant. So, the records kept by teachers in the course of their employment in respect of pupils may be disclosable.
52. Any request by an individual for access to information held about them must be complied with subject to this paragraph and to the exemptions set out in paragraphs 55-59 below. The School may, however, make a request for more specific details of the information sought.
53. A request for access to files without the permission of the individual must be directed to the Information Officer or the Comptroller and City Solicitor.
54. A record of the information disclosed in response to a request for access to information should be kept on the pupil's file, including details of any exemptions to disclosure relied upon (see paragraphs 55-59 below).

#### **Exemptions to Access by Data Subjects**

55. Confidential references given, or to be given by the Schools, are exempt from access. The Schools will therefore treat as exempt any reference given by them for the purpose of the education, training or employment, or prospective education, training or employment of any pupil.

56. It should be noted that confidential references received from other parties may also be exempt from disclosure, under the common law of confidence. However, such a reference can be disclosed if such disclosure will not identify the source of the reference or where, notwithstanding this, the referee has given their consent, or where disclosure is reasonable in all the circumstances.
57. Examination scripts, that is information recorded by pupils during an examination, are exempt from disclosure. However, any comments recorded by the examiner in the margins of the script are not exempt even though they may not seem of much value without the script itself.
58. Examination marks do not fall within an exemption as such. However, the 40 day compliance period for responding to a request is extended in relation to examination marks to either five months from the day on which the School received the request (if all the necessary conditions set out in paragraph 35 are fulfilled), or 40 days from the announcement of the examination results, whichever is the earlier.
59. Where a claim to legal professional privilege could be maintained in legal proceedings, the information is exempt from disclosure unless the privilege is waived.

#### **Repeated Requests for Access to Records**

60. Unless a reasonable period of time has lapsed between the compliance with one request and receipt of the next, under the DPA the School is not obliged to comply with subsequent identical or similar requests from that applicant.

#### **Complaints**

61. If an individual believes that the relevant School has not complied with this Policy or acted in accordance with the DPA they should utilise the relevant School's complaints procedure.
62. If the individual is still not satisfied, he/she may make representations to the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel (01626) 545 700.

City of London  
January 2015

This page is intentionally left blank



# Agenda Item 5

<b>Committee:</b>	<b>Date:</b>
City of London School for Girls Board of Governors	4 February 2015
<b>Subject:</b> Risk Management Strategy	<b>Public</b>
<b>Report of:</b> The Chamberlain	<b>For information</b>

## Summary

This report introduces the new Risk Management Strategy which was approved by the Audit and Risk Management Committee on 13 May 2014. All committees are receiving a similar report which provides information to Members about the new Risk Management Strategy and progress on its implementation. This report covers the City of London School for Girls.

In line with the Cabinet Office's Management of Risk (M\_O\_R) principles a Risk Management Strategy has been developed to provide a clearer and dynamic framework for managing organisational risks. Key changes in the Risk Management Strategy include a new framework to define risks, a new 4x4 risk scoring model, the introduction of a target risk score and a clearer route to escalate risks.

Service Committees will continue to have responsibility to oversee the significant risks faced by departments in the delivery of their service responsibilities. Chief Officers are accountable for effective risk management within their department, reporting to their relevant service Committee(s), a responsibility that cannot be delegated.

An on-line risk management system is currently being implemented which will assist in the recording, management, and dynamic reporting of risks.

The changes arising from the risk management strategy will be implemented within City of London departments and Institutions alongside the phased rollout of the risk management information system. This will be done by working with each department, beginning with the Chamberlain's.

At the request of the Audit and Risk Management Committee, a revised framework for the review of key departmental risks at the same time as seeking updates on Corporate Risks has been developed. The new programme of risk review by members of the Audit and Risk Management Committee commenced from 9 September 2014 with the Chamberlain's Department. The City of London School for Girls is scheduled for 3 November 2015.

The departmental risk registers will be reviewed, and updated, in line with the new

Risk Management Strategy including the adoption of the 4x4 risk scoring and introduction of a target risk score.

Recommendations:

Members are asked to

- Note the new Risk Management Strategy and plans for the phased roll-out of the strategy within departments and City of London Institutions.

## **Main Report**

### **Background**

1. In 2013 a risk management improvement plan was developed to improve and refresh the City Corporation's risk framework. An independent review of risk management was also undertaken by Zurich Municipal which further informed and strengthened the objectives set out in the improvement plan. Outcomes from the improvement plan resulted in changes to the risk framework and the creation of a Risk Management Strategy, which has replaced the risk management handbook and is in line with the terminology used commonly in other organisations as well as the Cabinet Office's Management of Risk principles. The Risk Management Strategy was approved by the Audit and Risk Management Committee on 13 May 2014.
2. Service committees have a responsibility to oversee the significant risks faced by departments in the delivery of their service responsibilities, receiving regular reports from Chief Officers identifying the significant risks and providing assurance that appropriate mitigation action has been identified and implemented. Chief Officers are accountable for effective risk management within their department, a responsibility that cannot be delegated.

### **Risk Management Policy (Page II, Appendix 1)**

3. As part of the Risk Management Strategy a new Risk Management Policy statement was created. This is a statement of intent for risk management signed by the Chairman of Audit and Risk Management Committee and the Town Clerk.
4. An objective of the risk management policy statement is briefly to communicate the City Corporation's commitment to risk management, in order to support the realisation of its objectives, and to highlight its appetite for risk.

### **Risk Management Strategy (Appendix 1)**

5. The Risk Management Strategy builds on the previous risk management handbook providing guidance on how risk management is used and how it will operate within the City Corporation. Development of this document also fits in with the Cabinet Office's M\_O\_R principles.

6. The Strategy was developed in consultation with the officers forming the Risk Management Group and has been reviewed by Chief Officers and Members of the Audit and Risk Management Committee.
7. Service committees continue to have a responsibility to oversee the significant risks faced by departments in the delivery of their service responsibilities, receiving regular reports from Chief Officers identifying the significant risks and providing assurance that appropriate mitigation action has been identified and implemented.
8. Key changes in the strategy include:
  - i. A clearer framework to define risks, using the Cause, Risk and Effect model (Appendix 1, Page 10).
  - ii. A new 4x4 scoring model for likelihood and impact (Appendix 1, Page 11). This brings it in line with the risk matrices for Health and Safety and City of London Police.
  - iii. The introduction of a Target Risk Score (Appendix 1, Page 22) to indicate how the Current/Net risk score will reduce further with the in-progress or planned controls. This will be the optimum score for the risk in order for it to be manageable, taking account of the resources available and the ability of the City Corporation directly to manage the risk once external factors are considered.
  - iv. A clear escalation route highlighting how risks will be raised to management boards based on the risk score or risk type (Page 16). Service committees will continue receiving top departmental risks, now set at a risk score 16 or above, on at least a quarterly basis.
  - v. Service committees can recommend departmental risks be reviewed further at the Audit and Risk Management Committee and can recommend the risks be escalated on to the Corporate Risk Register.

### **Risk Management Information System**

9. As departments are becoming more familiar with risk management, greater focus is being placed on the risk registers, which is resulting in an administrative burden due to the manual collation process involved using spreadsheets. To reduce this burden, improve consistency and significantly improve the ability to provide dynamic risk reports the City Corporation is introducing a risk management information system.
10. Some of the benefits that can be achieved from a risk management system include:
  - a. Clearer oversight of Corporate, Strategic and Operational risks;
  - b. Greater transparency and visibility of risk management;
  - c. Assurance that risk portfolios are actively managed and that risk management is robust;

- d. Improving data quality and saving time (and expense) in administering risk registers;
  - e. Behaviour changes from gathering information to interpreting what is said and improving the ability to provide business intelligence for decision making;
  - f. Easier to share and communicate risk information;
  - g. Improved reporting of risk information and usage in other areas, e.g. risk-based audits; and
  - h. Real time information with a clear audit trail.
11. In addition to the above, a risk system will also allow customised reports to be produced which can focus on specific areas of interest, for example, producing a report for the top financial risks for a particular service area. This cannot be currently achieved due to the independent nature of the risk registers on MS Excel.

### **Planned Roll out**

12. It is planned that changes arising from the risk management strategy are rolled out alongside the rollout of the risk management information system. This will ensure that information placed in the new system is refreshed and fits in line with the new risk framework. Installation of the new risk management software has commenced, with a phased roll-out now underway and due to be completed by the end of March 2015.
13. The CLSG Senior Management Team reviews the Risk Register annually, normally in the Autumn Term, and more frequently if required as a result of the Bursar's updating between formal approval meetings. Depending on priorities, risk information is included on the agenda for the annual Governors/SMT Strategy Day (last discussed in July 2011). The Governor responsible for Health & Safety receives a copy of the Risk Register following SMT review (last delivered October 2014). Up until the implementation of the software planned for Quarter 4 2014/15 risk information will continue to be presented in the current format.

### **Cyclical Review of Corporate and Departmental Risks**

14. Over the last two and a half years, a structured approach to reviewing the City's strategic risks has been adopted. At the request of the Committee, a revised framework for the review of key departmental risks at the same time as seeking updates on Corporate Risks has been agreed with the Chairman of the Audit and Risk Management Committee and Chief Officers.
15. The new programme of risk review by Members of the Audit and Risk Management Committee commenced from 9 September 2014 with the Chamberlain's Department, with the City of London School for Girls scheduled for 3 November 2015.

## **Conclusion**

16. The risk management framework continues to be actively reviewed to make it easier and effective in order to embed it further in the City Corporation. Service committees are an essential part of the framework to enable the City Corporation to understand and manage risks and in order to achieve the objectives set out in their respective departmental business plans.

## **Appendices**

- Appendix 1 – Risk Management Strategy

### **Paul Nagle**

Head of Audit and Risk Management

T: 0207 332 1277

E: paul.nagle@cityoflondon.gov.uk

This page is intentionally left blank

# City of London Corporation

## Risk Management Strategy

Version 2.03

Approved by the  
Audit & Risk management  
committee  
13 May 2014



## Contents

<i>VERSION HISTORY</i> .....	<i>I</i>
<i>RISK MANAGEMENT POLICY STATEMENT</i> .....	<i>II</i>
<b>CHAPTER 1: INTRODUCTION</b> .....	<b>1</b>
WHAT IS RISK AND RISK MANAGEMENT? .....	2
PURPOSE OF THIS STRATEGY .....	3
<b>CHAPTER 2: MANAGING RISKS</b> .....	<b>4</b>
WHY MANAGE RISKS .....	4
ROLES AND RESPONSIBILITIES .....	5
<b>CHAPTER 3: THE RISK MANAGEMENT PROCESS</b> .....	<b>7</b>
THE RISK MANAGEMENT CYCLE .....	8
STEP 1: CLARIFY OBJECTIVES .....	9
STEP 2: IDENTIFY AND ANALYSE RISKS .....	10
STEP 3: ASSESS RISKS (4X4) .....	11
STEP 4: ADDRESS RISKS .....	12
<i>Ownership of Risks and Controls</i> .....	13
STEP 5: MONITOR AND REVIEW .....	14
<b>CHAPTER 4: REPORTING RISKS</b> .....	<b>15</b>
REPORTING FRAMEWORK .....	15
ROLE OF AUDIT AND RISK MANAGEMENT COMMITTEE .....	15
ROLE OF OTHER COMMITTEES AND DEPARTMENTS .....	15
RISK REGISTERS .....	17
CHALLENGING ENVIRONMENT .....	18
<b>CHAPTER 5: STRATEGIC IMPROVEMENT</b> .....	<b>19</b>
<b>GLOSSARY</b> .....	<b>20</b>
<b>APPENDIX 1 – RISK SCORING</b> .....	<b>22</b>
LIKELIHOOD SCORING GUIDE .....	23
IMPACT SCORING GUIDE .....	24
RISK MATRIX .....	25



## Version History

This strategy builds on and replaces earlier versions of the risk management handbook and is intended to be a high level document that provides a framework to support the City Corporation's statutory responsibility for managing risk.

It also allows the City to further strengthen and improve its approach to risk management enhancing its ability to deliver its corporate aims and objectives successfully.

The risk management strategy sets out key objectives across a three year rolling period but will be reviewed annually to ensure it remains fit for purpose.

### Version control:

Date	Version Number	Comments
21/04/11	1.0	- Risk Management Handbook created
22/04/14	2.0	- Refreshed Risk Management Handbook and renamed as Risk Management Strategy
21/10/14	2.01	- Minor typographical changes
23/10/14	2.02	- Minor typographical changes
28/10/14	2.03	- Job title change

# **CITY OF LONDON CORPORATION'S** **RISK MANAGEMENT POLICY STATEMENT**



**THE CITY OF LONDON CORPORATION (COL) RECOGNISES AND ACCEPTS ITS RESPONSIBILITY<sup>1</sup> TO MANAGE RISKS EFFECTIVELY IN A STRUCTURED MANNER IN ORDER TO ACHIEVE ITS OBJECTIVES AND ENHANCE THE VALUE OF SERVICES PROVIDED TO THE COMMUNITY.**

**In pursuit of this policy COL has adopted a risk management strategy that captures the following key objectives:**

- Enables corporate, departmental and programme objectives to be achieved in the optimum way and to control risks and maximise opportunities which may impact on COL's success;
- COL recognises its responsibility to manage risks and support a structured and focused approach that includes risk taking in support of innovation to add value to service delivery.
- Risk management is seen as an integral element of the Corporation culture;

**These key objectives will be achieved by:**

- Establishing clear roles, responsibilities and reporting lines for risks and their controls at all levels;
- Ensuring that Members, Chief Officers, external regulators and the public at large can obtain necessary assurance that the Corporation is mitigating the risks of not achieving key priorities and managing opportunities to deliver more value to the community, and is thus complying with good corporate governance;
- Complying with relevant statutory requirements, e.g. the Bribery Act 2010, the Health and Safety at Work Act, the Local Government Act and more;
- Providing opportunities for shared learning on risk management across the Corporation and its strategic partners;
- Monitoring arrangements on an on-going basis.

## **APPETITE FOR RISK**

**City of London Corporation seeks to minimise unnecessary risk and manage residual risk to a level commensurate with its status as a public body so that:**

- The risks have been properly identified and assessed;**
- The risks will be appropriately managed, including the taking of appropriate actions and the regular review of risk(s);**

**The City of London Corporation will also positively decide to take risks in pursuit of its strategic aims where it has sufficient assurances that the potential benefits justify the level of risk to be taken.**

APPROVED BY:

Alderman Nick Anstee

(Chairman of the Audit and Risk Management Committee)

John Barradell

(Town Clerk and Chief Executive)

<sup>1</sup>Accounts and Audit Regulations 2011

## Chapter 1: Introduction

In a rapidly changing environment, with the effects of reduced public funding, the changing demographics and the continual demand on services, the City of London Corporation is faced with an unprecedented challenge to deliver its statutory obligations, provide high quality services, as well as manage the associated social and financial implications.

The interlocking challenges faced from budget pressures, supplier failures, security issues, and so on, has created a complex matrix of risks, all requiring some level of management.

Amongst these challenges however opportunity can also be created for those who are best placed to embrace, innovate, collaborate and manage new risks.

This strategy has been developed to provide guidance on the City's approach to managing both opportunities and threats within the business environment, and through adoption will help to create an environment which meets the needs of the City's citizens, partners and other key stakeholders.

Aligned with this we will aim to be an exemplar of good practice and we will continue to meet our statutory responsibility to have in place satisfactory arrangements for managing risks, as laid out under regulation 4 of the Accounts and Audit Regulations 2011:

**“The relevant body is responsible for ensuring that the financial management of the body is adequate and effective and that the body has a sound system of internal control which facilitates the effective exercise of that body's functions and which includes arrangements for the management of risk.”**

Only by active management of risks will the City of London Corporation be able to meet its corporate objectives which in turn will enhance the value of services provided to the City.

## **What is risk and risk management?**

The word 'risk' is a very common term used in everyday language and will be referred to by many professions from both the public and private sector. It is a concept which has grown from being used to describe a narrow field of risks which are to be avoided, to a wider, more holistic focussed world where importance is placed on how to manage risk rather than avoiding it.

The following definition for risk<sup>2</sup> has been adopted by the City of London Corporation:

***“The effect of uncertainty on objectives”***

Risk management is a business discipline that every working sector uses to achieve objectives in an efficient, effective and timely manner. Our risk management definition is<sup>2</sup>:

***“The systematic application of principles, approach and processes to the tasks of identifying and assessing risks, and then planning and implementing risk responses”***

<sup>2</sup>OGC: Management of Risk

## **Purpose of this strategy**

The City of London Corporation is a complex organisation, comprising a number of departments with very diverse operations. By adhering to this strategy, the City of London Corporation will be better placed to meet all its objectives in an efficient, effective and timely manner.

Every risk is linked to a business objective and this strategy will help enforce a proactive stance to managing these risks, ensuring that less time is spent reacting to situations and more time is spent taking advantage of opportunities.

Listed below are some of the benefits of successfully implementing this strategy:

- Ability to satisfy statutory requirements (under the Local Government Act 1999), government regulations (e.g. Corporate Manslaughter Act, Health and Safety at Work Act, Children's Act 2004, Care Bill 2014, and more) and compliance related matters (e.g. financial and contractual regulations, Bribery Act 2010, and more);
- Protecting and enhancing the City of London Corporation's reputation;
- Better management and partnership working with city partners, improving safeguards against financial loss and reducing chances of organisational failure;
- Increased innovation, value for money and visual improvements in service delivery;
- Improved ability to justify decisions being taken and reduced risk of mistakes, reducing complaints and improving customer satisfaction;
- Ensuring teams achieve goals and objectives, and increasing their competitiveness (against other organisations);
- Common understanding of risk management for consistency and ease of application;
- Improved assurance levels arising from audit and external inspections, providing confidence to customers that risks are being controlled;
- Effective resilience to changing environmental conditions, to protect key services.

## Chapter 2: Managing risks

### Why manage risks

Effective risk management is an on-going process with no overall end date as new risks (threats and opportunities) arise all the time.

The Corporation is fully committed to developing a culture where risk is appropriately and effectively managed for which the following benefits will be achieved:

- An increased focus on what needs to be done (and not done) to meet objectives;
- More effective allocation of resources reducing incidences of mistakes and providing greater control of costs – demonstrating value for money; Greater transparency in decision making and enhanced ability to justify actions taken;
- Improved resilience against sudden changes in the environment including, but not limited to, natural disasters and risks related to supplier failures;
- Reduction of the Corporation's insurance costs, in turn protecting the public purse;
- Improved safety for staff, partners and residents; and
- Minimised losses due to error or fraud across the Corporation.

### Choosing whether to eliminate or innovate

Innovation by its very nature involves taking risks, and as a consequence, places greater demand on all of us to ensure that those risks are well managed.

One of the key aims of risk management is to ensure that the process supports innovation, not by preventing it - but rather helping to take well thought through risks that maximise the opportunities of success.

***Good risk management is about being "risk aware" not "risk averse"!***

## Roles and Responsibilities

The City Corporation considers risk management to be an intrinsic part of the Corporation's system of corporate governance. It is recognised that for this to be effective it is vital that everybody within the Corporation understands the role they play in effective management of risk.

<b>Tier</b>	<b>Responsibility</b>
Court of Common Council	Overall accountability for risk management.
Audit and Risk Management Committee	Providing assurance to the Court on the effectiveness of the risk management framework and its application. The Chairman is the Member Risk Champion.
Service Committees	Oversee the significant risks faced by Departments in the delivery of their service responsibilities.
Chief Officers Group	Collective responsibility for management of Corporate risks.
Chief Officers Summit Group	Promoting, steering and monitoring risk management for the Corporation. The Chief Officers Summit Group oversees the strategic elements of risk management.
Business Support Director	Officer Risk Champion, promoting risk management and leading Senior Management engagement. The Business Support Director is the Chairman to the Risk Management Group and also attends the Audit and Risk Management Committee.
Risk Management Group	Promoting and embedding risk management, with key outcomes reported to the Chief Officers Summit Group. The Risk Management Group oversees the operational elements of risk management.
Head of Audit and Risk Management	Deputy Chairman of the Risk Management Group and provides assurance to the effectiveness of the internal control environment.
Corporate Risk Advisor	Provides risk management support and advice to the Corporation. Also responsible for promoting the consistent use of risk management, developing the risk framework and facilitation of the City of London's Corporate Risk Register.

<b>Tier</b>	<b>Responsibility</b>
Individual Chief Officers	Accountable for effective risk management within their department, reporting to their relevant service Committee(s) – this responsibility cannot be delegated.
Risk Owner	The person that is accountable for the overall management of the risk, including bidding for resources to control the risk.
Control Owner	The person that has accountability for a particular task to control an aspect of the risk, either the Cause or the Effect. The role is accountable to the Risk Owner.
Departmental Risk Coordinators	Promoting, facilitating and championing the implementation of risk management within their department.
Service/ Project Managers	Accountable for effective management of risk within their areas of responsibility.
Employees	Maintaining an awareness and understanding of key risks and management of these in day-to-day activities.

Outcomes of this strategy will be achieved by working closely with many key teams within departments such as Health and Safety, Insurance, Corporate Performance & Business Development, Project Management, Contingency Planning and more.

The ultimate responsibility for risk management lies with the Court of Common Council and the Town Clerk. However, it must be stressed that **risk management is the responsibility of everyone working in, for and with the City of London Corporation.**



## **Chapter 3: The risk management process**

Essentially risk management is the process by which risks are identified, evaluated, controlled and monitored at regular intervals. It is about managing resources wisely, evaluating courses of action to support decision-making, protecting clients from harm, safeguarding assets and the environment and protecting the Corporation's public image.

Whenever an activity takes place, there will be an outcome that will either lead to a success or failure. In undertaking the activity there will be a number of factors which needs to be right to determine whether the activity is a success or not, or to put it the other way round, there are a number of risk factors which, if they are not managed properly, will result in failure rather than success.

Risk Management is also a business planning tool designed to provide a methodical way for addressing risks. It is about:

- Identifying the objectives and what can go wrong;
- Acting to avoid it going wrong or to minimise the impact if it does;
- Realising opportunities and reducing threats.

## The risk management cycle

The risk management process is broken down into five steps illustrated below:

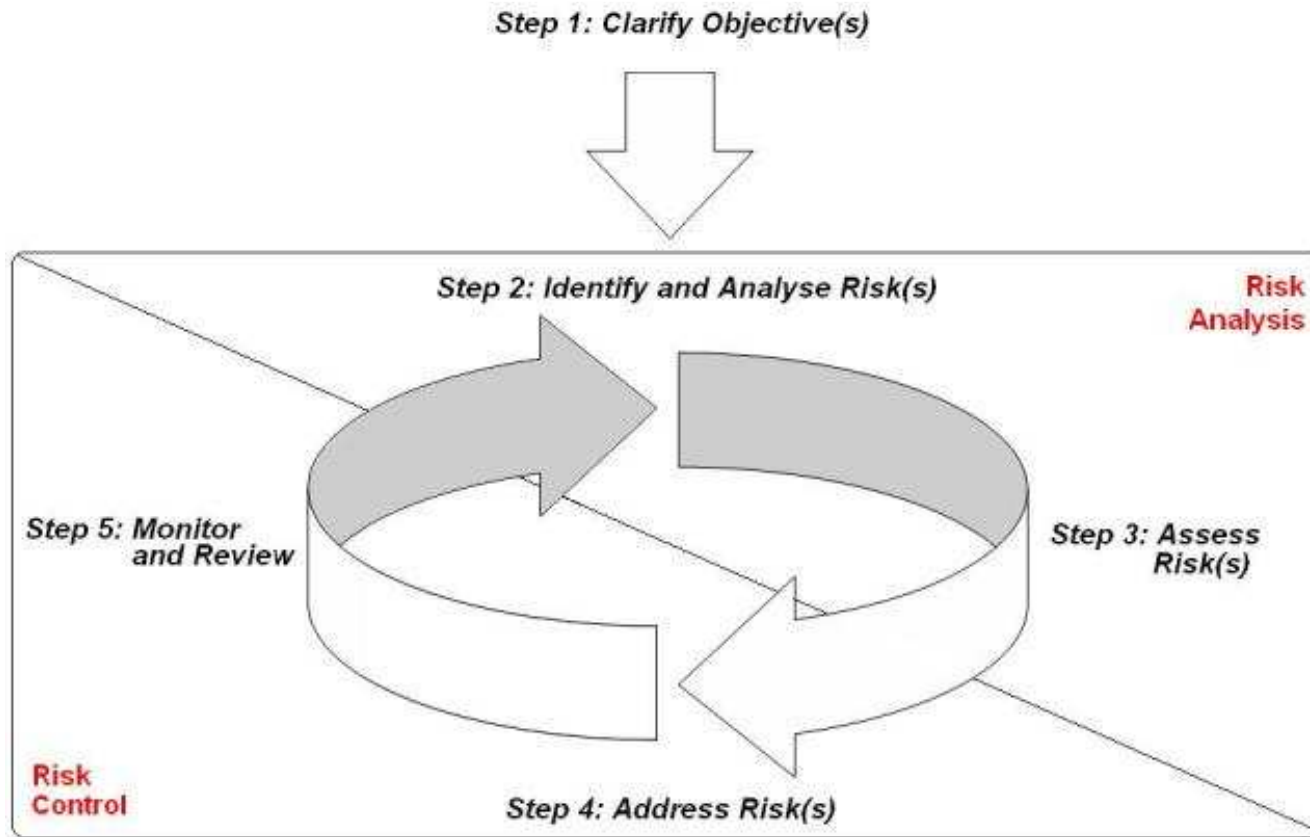


Figure 1: City of London's risk management cycle

## **Step 1: Clarify Objectives**

It is difficult to think about risks in isolation, so the first step is to be clear about the objectives and key deliverables. This part of the process requires information about the (planned) activity.

This will include an understanding of:

- The corporate/departmental/project objectives;
- The scope of the activity;
- The assumptions that have been made;
- The list of stakeholders; and
- How the activity sits within the corporate/departmental/project structure.

### ***This includes:***

- Making sure that everyone is clear about the relationship between the services and its wider environment;
- Identifying internal and external stakeholders;
- Understanding the Corporation and its capabilities, as well as its objectives and strategies that are in place to achieve them.

**Note:** Risks will always be linked to a Service, Departmental or Corporate objective.

## **Step 2: Identify and Analyse risks**

The aim of this step is to identify the risks to the (planned) activity that may affect the achievement of the objective(s), which can either be positive or negative.

Consultation is required from different levels of management and staff members, and sometimes customers and stakeholders, asking the following questions:

- What might prevent the achievement of the stated objectives?
- Has it gone wrong before?
- Who should own this risk?
- When should we start managing this risk?

It is widely recommended to identify risks through workshops and/or training sessions. However, there are many other methods which can be used such as questionnaires, a Strengths - Weaknesses - Opportunities - Threats analysis, brainstorming sessions, and more.

During the identification stage the following information needs to be gathered:

- The description of the risk, in terms of Cause → Risk → Effect;
- The nature of the risk – for example, political, financial, reputation, and more; and
- The name of the individual taking responsibility for the risk (i.e. the risk owner).

### Step 3: Assess Risks (4x4)

Every risk should be assessed to help determine how much attention is given to the particular event. This is done by ranking the risks with a set of scores determined by their individual likelihood and impact rating.

The City of London Corporation uses a 4 point scale and the multiple of the likelihood and impact gives us the risk score, which is used to determine the risk profile. See Appendix 1 for details on how risks should be scored.

The risk score is placed on the Risk matrix (Figure 2) and is used to help prioritise and assist risk owners in the actions they need to take to manage the risk.

		Impact			
		Minor (1)	Serious (2)	Major (4)	Extreme (8)
Likelihood	Likely (4)	4	8	16	32
	Possible (3)	3	6	12	24
	Unlikely (2)	2	4	8	16
	Rare (1)	1	2	4	8

Figure 2: COL risk matrix

Step 5 highlights how often risks should be reviewed and Chapter 4 highlights how the risk scores are used for reporting purposes.

#### **Step 4: Address Risks**

Without this step, risk management would be no more than a bureaucratic process. Addressing risk involves taking practical steps to manage and control it.

Not all risks need to be dealt with in the same way. The common risk response outlined below should help in considering the range of options available when responding to risks.

Importantly, when agreeing actions to control risk, consideration is required on whether the actions themselves introduce new risks

#### Threat responses

When managing threats, the controls that are put in place should help to effectively reduce the risk to a manageable level. There are four approaches that can be taken when deciding on how to manage threats:

- **Reduce:** A selective application of management actions, by applying internal control to reduce either the likelihood or the impact, or both, designed to contain risk to acceptable levels, e.g. mitigation action, contingency planning and more;
- **Transfer:** Shifting part of the responsibility or burden for the loss to another party, e.g. through outsourcing, insurance, etc;
- **Avoid:** An informed decision not to become involved in a risk situation. This can be challenging as the City of London Corporation may not be able to avoid risks associated with its statutory functions;
- **Accept:** An informed decision to accept the likelihood and impact of a particular risk. For example, the ability to do anything about a risk may be limited, or the cost of taking any action may be disproportionate to the potential benefit.

## **Ownership of Risks and Controls**

Having identified and defined the risks, it is essential that someone "owns" them (i.e. the risk owner). This is not the same as being responsible for carrying out the tasks or actions for the risk (i.e. the control owner). This is a critical part of the step as without a named individual it is unlikely that the risk will be managed.

### Risk Owner

It is important that the risk owner, where possible, be:

- A person who has the ability to influence the outcome of the event, one way or another;
- A person who can be accountable for the delivery in the area where the risk would have an effect;
- A person who can take charge and lead nominated control owners.

From a departmental viewpoint, the risk owner should be a member of the department's management team.

### Control Owner

Control owners are responsible for carrying out the tasks or actions for the risk, as assigned by the risk owner.

It is important to note that:

- Control owners can be different from the Risk owner;
- Control owners can be from a different department to the Risk owner;
- A risk may contain many controls, therefore many control owners, however only on an exceptional basis would one control be assigned to multiple risks.

Control owners can be any officer within the organisation, but must have an adequate reporting line to the Risk owner.

### Step 5: Monitor and Review

Once risks have been identified and appropriate controls and action plans put in place to manage them, it is essential to routinely monitor their status. Risks change, due to many factors, and it is essential that they are periodically reviewed to capture any new events which may affect the delivery of our objectives.

As a guide, risks should be reviewed in management meetings using the following criteria:

Risk Type	Standard Review	Programmes, projects and partnerships
Red Threats	1-3 months	Monthly
Amber Threats	3 months	Monthly
Green Threats	6 months	Quarterly

**Note:** At least annually, each risk register should be reviewed in its entirety.



## **Chapter 4: Reporting risks**

### **Reporting framework**

It is essential that risk management is used as a tool to assist good management and to provide assurances to relevant officers and Members that adequate measures have been taken to manage risk.

Escalation of risks ensures that managers have a clearer picture on risks or potential issues facing service areas. This helps in the overall decision making process by allowing senior staff to allocate resources or review areas of concern.

Page 16 illustrates the reviewing and reporting framework to support this escalation and assurance process.

### **Role of Audit and Risk Management Committee**

As set out in its formal terms of reference, the Audit and Risk Management Committee is responsible for monitoring and overseeing the City Corporation's risk management strategy and needs to be satisfied that the assurance framework properly reflects the risk environment. It is through this Committee that the Court of Common Council discharges its responsibility for obtaining assurance that those risks faced by the Corporation are being appropriately managed.

### **Role of Other Committees and Departments**

It is the role of each Service Committee and Department to maintain and act on its own risks, working closely with the Risk and Assurance Manager if need be. The criteria for escalating risks should be agreed by the relevant Service Committee and Chief Officer.

The Audit and Risk Management Committee will concentrate on monitoring the Corporate Risks faced by the City Corporation, and the measures taken to control the risk. The Audit and Risk Management Committee will also seek assurance regarding the effective operation of this framework at Committee level.

## Review and Reporting Framework

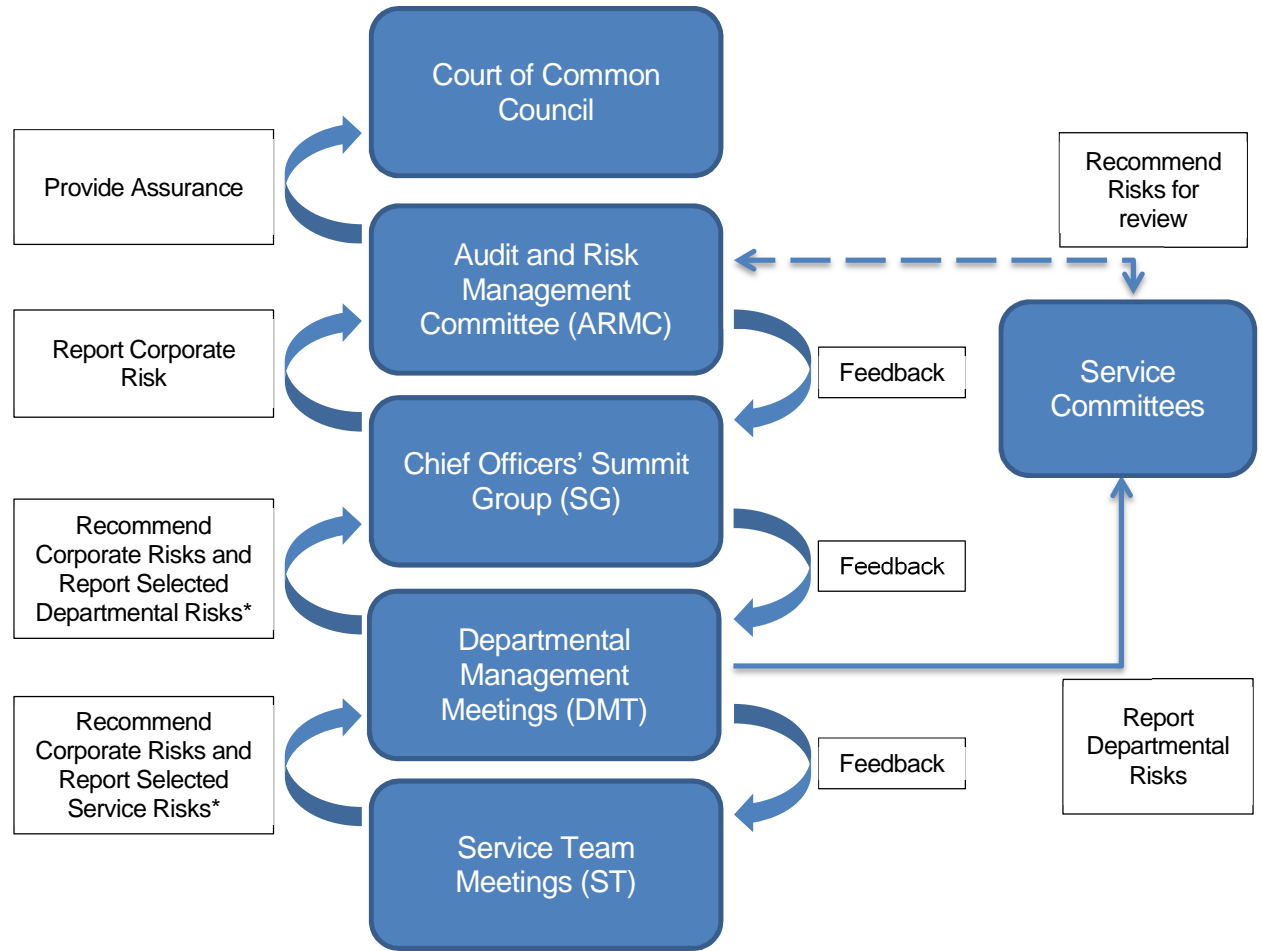
Risks will be escalated using a bottom up process depending on the risk score (i.e. Risk tolerance) and/or management recommendation.

Corporate Reviews will be undertaken either every two or three months.

Departmental Reviews should be adapted to suit the structure of each respective department, although as minimum should be done Quarterly.

Annual review of all risks should be undertaken as a minimum.

Reporting Criteria		
Corporate reviews	ARMC	Oversee Corporate risks
	SG	Identify Corporate/Departmental risks and review all Departmental risks of score 24 or more.
Departmental Reviews	DMT's	Identify Corporate/Departmental risks and review all Service Teams risks of score 16 or more
	ST's	Identify Corporate/Departmental risks and review all Service risks of score 6 or more
	Team meetings /121's	Identify potential Corporate/Departmental risks and review all current risks



\*exception basis

## Risk Registers

Key risk registers are listed below along with their escalation criteria (based on risk score).

Corporate Risk Register	The Corporate Risk Register is used to highlight and assure Members that key risks are being effectively managed. These risks are extracted from various areas of the Corporation's risk system as directed by the Members and approved by the Town Clerk and Chief Officers (See Glossary for definition of Corporate Risk).
Top Risk Register	This register flows out from the Departmental risk registers and is challenged and moderated quarterly by the Chief Officer's Summit Group (SG).  Risks which are escalated here are those with a risk score of 24 or more.
Departmental risk register	This register flows out from the Service risk registers and is challenged and moderated quarterly by the Departmental Management Teams (DMT's).  Risks which are escalated here are those with a risk score of 16 and above.
Service risk register	This register flows out from the Service area/Team risk registers and is challenged and moderated quarterly by the Service Team Meetings (ST's).  Risks which are escalated here are those with risk score of 6 and above.
Programme and Project risk registers	Where it is considered appropriate, major partnerships, programmes and projects will produce and maintain their own risk registers. Risk to the programme/project should be recorded within Project Vision and managed through the corporate Project framework.

## Challenging environment

There is a strong support framework in the City Corporation to challenge risks and to provide assistance to departments. Below lists some of the key groups which assist with this:

<p>Audit and Risk Management Committee</p>	<p>On a periodic cycle each Corporate risk and a nominated Departmental risk register is challenged by Members of the Audit and Risk Management Committee. These sessions allow Chief Officers to demonstrate how risks are being managed and allow Members to directly question any areas of interest.</p>
<p>Chief Officers' Summit Group</p>	<p>Each quarter the Chief Officers' Summit Group review all the top risks for the Corporation (of score 24 and above) and challenge and moderate as necessary. Corporate risks are escalated by the Departmental Management Teams and upon approval are escalated to the Audit and Risk Management Committee.</p>
<p>Departmental Risk Coordinators</p>	<p>The risk coordinators provide advice and guidance on the application of the Risk Management Strategy, working closely with the Risk and Assurance Manager. They are the first point of call for risk related matters for their department providing operational support.</p> <p>The Risk Coordinators meet as a group on a 6 monthly basis with representatives from the City of London Police, Internal Audit, Health and Safety, Contingency Planning, Corporate Performance &amp; Business Development and Insurance.</p>

## Chapter 5: Strategic Improvement

This strategy is based on strengthening and improving the City's approach to risk management, enhancing its ability to deliver its corporate aims and objectives successfully. It is recognised that to significantly improve the risk management capability and the maturity of the Corporation will be a journey requiring continuous review and improvement activity.

The Risk Management Strategy will be regularly reviewed. Further activities to enhance existing arrangements will be identified by reviewing emerging best practice and assessing their suitability for implementation in the context of the aims, objectives and organisational culture of the Corporation. Once assessed and agreed, further improvement activities will be implemented through the risk management improvement plan.

Below lists some of the key activities/projects which will assist in delivering the strategy.

<b>Project / Task</b>	<b>Brief summary</b>	<b>Target date / Frequency</b>
Introduce a Risk Management Information System	To procure an online risk register tool ensuring consistency, transparency and a clear audit trail for risks and controls.	Aug 2014
Improve skill set and raise awareness of risk management	Create a suite of tools to raise awareness and assist officers in the management of risks.	Jan 2015
Review new framework	Review the risk maturity of the organisation on a yearly cycle.	Annual review
Introduce Opportunity Risk Management	Subject to the organisations risk maturity level, introduce the opportunity risk methodology and look to report opportunity risks.	Review in 2015/16

## Glossary

Consistent understanding and application of language provides a sound basis for embedding risk management. To promote this consistency, the following key terms are defined:

Term	Definition
Cause	<p>Definite events or sets of circumstances which exist in the department, programme/project, partnership or their environments, and which give rise to uncertainty.</p> <p>Causes themselves are not uncertain since they are facts or requirements.</p>
Control Evaluation	A measure to determine how effective the controls are.
Control Owner	The person that has accountability for a particular task to control an aspect of the risk, either the Cause or the Effect. The role is accountable to the Risk Owner.
Controls	Measures taken to control the impact or likelihood of risks to an acceptable level.
Corporate risk	<p>Strategic or Operational risks reported to the Audit and Risk Management Committee for assurance purposes.</p> <p>One or more of the following criteria must apply:</p> <ul style="list-style-type: none"> <li>▪ The risk relates directly to one or more of the Strategic Aims or Key Policy Priorities.</li> <li>▪ A risk that has significant impact on multiple operations if realised.</li> <li>▪ There are concerns over the adequacy of departmental arrangements for managing a specific risk.</li> </ul> <p>Corporate risks can also be those requested by the Audit and Risk Management Committee specifically.</p>
Current / Net risk	The re-assessed level of risk taking in to account the existing controls.
Effect	<p>Unplanned variations from objectives, either positive or negative, which would arise as a result of risks occurring.</p> <p>Effects are contingent events, unplanned potential future variations which will not occur unless risks happen.</p>
Operational Risk	Risks arising from or relating to the execution of day-to-day operations and service delivery.

<b>Term</b>	<b>Definition</b>
Original / Gross risk	The assessed level of risk on the basis that no mitigating controls are in place.
Risk	The effect of uncertainty on objectives.
Risk Management	The systematic application of policies, procedures and practices to the tasks of identification, evaluation, and mitigation of issues that threaten the achievement of defined objectives.
Risk Owner	The person that is accountable for the overall management of the risk, including bidding for resources to control the risk.
Strategic risk	Risks arising from or relating to long term departmental objectives.
Target risk	The level at which the risk will be deemed as acceptable.

## Appendix 1 - Risk scoring

Risk scoring is purely subjective. Perceptions of a risk will vary amongst individuals and hence it is better to score the risk collectively than leave it to one person's judgement.

### Definitions

1. **Original/Gross score:** the level of risk perceived before any mitigating actions/controls have been put in place.
2. **Current/Net score:** the level of risk currently perceived by the user/management, taking in-to account any controls.
3. **Target score:** the preferable score for the risk to be in order for it to be manageable, thinking in term of what resources are available, and the ability of the Corporation to directly manage the risk once external factors are considered.

### Risk scoring method

Risks are scored in terms of likelihood and impact

→ Risk should be scored by first determining how likely it is to occur (**Likelihood**)

→ It should then be rated according to the worst case scenario if it should arise (**Impact**).



**Likelihood scoring guide**

The criterion below is not exhaustive and intended to be used as a guide. **You will need to come to a management consensus when scoring risks.**

	Rare	Unlikely	Possible	Likely
	1	2	3	4
Criteria	Less than 10%	10 – 40%	40 – 75%	More than 75%
Probability	Has happened rarely/never before	Unlikely to occur	Fairly likely to occur	More likely to occur than not
Time period	Unlikely to occur in a 10 year period	Likely to occur within a 10 year period	Likely to occur once within a one year period	Likely to occur once within three months
Numerical	Less than one chance in a hundred thousand (<10 <sup>-5</sup> )	Less than one chance in ten thousand (<10 <sup>-4</sup> )	Less than one chance in a thousand (<10 <sup>-3</sup> )	Less than one chance in a hundred (<10 <sup>-2</sup> )

## Impact scoring guide

The criterion below is not exhaustive and intended to be used as a guide. **You will need to come to a management consensus when scoring risks.**

		Minor	Serious	Major	Extreme
		1	2	4	8
<b>THREATS</b>	Service Delivery / Performance	Minor impact on service, typically up to 1 Day	Service Disruption 2-5 Days	Service Disruption > 1 week to 4 weeks	Service Disruption > 4 weeks
	Financial	Financial loss up to 5% of Budget	Financial loss up to 10% of Budget	Financial loss up to 20% of Budget	Financial loss up to 35% of Budget
	Reputation	Isolated service user/stakeholder complaints contained within business unit/division	Adverse local media coverage/multiple service user/stakeholder complaints	Adverse national media coverage 1-3 days	National publicity more than 3 days. Possible resignation of leading Member or Chief Officer.
	Legal / Statutory	Litigation claim or fine less than £5,000	Litigation claim or fine between £5,000 and £50,000	Litigation claim or fine between £50,000 and £500,000	Multiple civil or criminal suits. Litigation claim or fine in excess of £500,000
	Safety / Health	Minor incident including injury to one or more individuals	Significant Injury or illness causing short term disability to one or more person	Major injury or illness/disease causing long term disability to one or more person.	Fatality or life threatening illness / disease (e.g. Mesothelioma) to one or more persons
	Objectives	Failure to achieve Team plan objectives	Failure to achieve one or more service plan objective	Failure to achieve a Strategic plan objective	Failure to achieve a major corporate objective

## Risk Matrix

The following chart shows the area the risk will fall in to dependant on its score, with red being the most severe and green being the least. The scores within the chart are multiples of the likelihood and impact.

e.g. (Likelihood of) 4 x (Impact of) 4 = (Risk Score of) 16

Impact scores increase by a factor of 2, thus having greater weighting in comparison to the Likelihood scores.

		Impact			
		Minor (1)	Serious (2)	Major (4)	Extreme (8)
Likelihood	X				
	Likely (4)	4	8	16	32
	Possible (3)	3	6	12	24
	Unlikely (2)	2	4	8	16
Rare (1)	1	2	4	8	

Figure 2: COL risk matrix

### What the colours mean (as a guide):

- Red - Urgent action required to reduce rating
- Amber - Action required to maintain or reduce rating
- Green - Action required to maintain rating

This page is intentionally left blank

<b>Committee:</b> Board of Governors of the City of London School for Girls	Date: 4 February 2015
<b>Subject:</b> Action Taken under Urgency Procedures	<b>Public</b>
<b>Report of:</b> Town Clerk	<b>For Information</b>
<b><u>Summary</u></b>	
<p>This report advises Members of action taken under urgency procedures by the Town Clerk in consultation with the Chairman and Deputy Chairman since the last meeting of the Board, in accordance with Standing Order No. 41(a).</p> <p><b>Recommendation</b> That the action taken since the last meeting of the Board be noted.</p>	

## **Main Report**

### **Revision of Mandatory Policies**

1. The City of London School for Girls was inspected by the Independent Schools Inspectorate (ISI) between 20<sup>th</sup> and 23<sup>rd</sup> January 2015. In their pre-inspection discussion of regulatory checks, the Reporting Inspector (RI) informed the Headmistress (EH) that three mandatory policies required revision in order to be compliant with the January 2015 ISI Regulatory Requirements (RRs).

2. The RI further advised that, assuming that the necessary approval could be obtained for the required revisions, the existing versions of the three policies on the website and portal should be replaced and parents and staff informed accordingly as soon as possible and not later than 23<sup>rd</sup> January 2015 in order to achieve compliance. Authority was therefore given to the adoption of the revised versions using urgency procedures on 20 January 2015. I understand that the necessary steps have now been taken and, in particular, the revised policies, concerning Behaviour Management, Child Protection and Complaints can be found on the School's website at:-

<http://www.clsq.org.uk/page/?title=school+policies&pid=114>

3. For Members information, the changes to the extant approved policies were relatively minor and are summarised below:

#### **Behaviour Management**

- Addition of a clear statement that the school does not use corporal punishment.
- Reference to January 2015

### Child Protection (CP)

- Need for all staff to read Part 1 of Keeping Children safe in Education (KCSIE) as a minimum.
- CP training as specified by Local Safeguarding Children Board (LSCB).
- Volunteers' awareness of CP arrangements.
- City Corporation main contact details.

### Complaints

- Clarification of apparent overlap between informal and formal stages.
- Reporting route relationship to subject matter.

*[Copies of background papers concerning the decision is available to Members upon request from the contact below]*

### **Contact:**

Jacqui Daniels

Town Clerk's Department

Tel: 020 7332 1480

Email: [jacqui.daniels@cityoflondon.gov.uk](mailto:jacqui.daniels@cityoflondon.gov.uk)

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank