

TITLE				REF		VERSION
Risk Management Policy				CP018		V5
APPROVAL BODY:				DATE		REVIEW DATE
Corporation Board				30 th April 2024		3rd January 2026
LEAD PERSON		Head of Governance				
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RISK MANAGEMENT POLICY

Policy Statement

Activate Learning adopts a proactive approach to identifying and managing risks to the Group and its strategic aims. The Corporation Board and its committees work openly and collaboratively with the Group Executive Team to set and implement an appropriate risk appetite and to recognise and manage risks accordingly.

Purpose

This policy sets out our approach to risk management and our responsibilities within that, including how the Group makes use of internal audit.

Scope

This policy applies to all staff and governors of Activate Learning, in so far as the Group's risk management culture affects us all, and particularly applies to management staff and the Corporation Board.

Responsibilities

The **Corporation Board** is responsible for setting the risk management culture and risk appetite of the Group, identifying acceptable and unacceptable types of risk, and setting expectations of management and staff accordingly. The Board is responsible for monitoring the management of significant risks and approving decisions that materially affect the Group's risk profile, whilst seeking assurance regarding the management of less significant risks. The Board reviews the Group's risk management approach annually.

The **Audit and Risk Committee** is responsible for monitoring and approving the Group's Corporate Risk Register and associated action plans, making recommendations to the Corporation and assigning risk management responsibilities to other Corporation committees as appropriate. The Committee advises the Corporation Board about the effectiveness of the Group's risk management systems.

The **Group Executive Team (GET)** is responsible for identifying and assessing strategic risks affecting the Group and updating the Strategic Risk Register accordingly. The GET is responsible for ensuring that risks are monitored, managed effectively, and mitigated where practical, in line with the agreed risk appetite.

Group Directors are responsible for identifying and assessing risks affecting their directorates and ensuring that risks are effectively mitigated and escalated to the GET as appropriate.

Commitment Statement

Activate Learning's systems of internal control is made up of several elements that come together to ensure we can identify and respond to risk. These elements include:

- Assessment of risk: We assess and report risks to the GET through the organisation's leadership structure and the GET regularly review risks to the Strategic Plan. Significant risks are recorded on the Strategic Risk Register and regularly monitored, and the GET agree actions to improve controls.
- **Policies and procedures**: We operate a robust framework of policies and procedures, which are approved within an agreed scheme of delegation and subject to regular review.

- **Reporting**: Our reporting structures are designed to ensure that key risks are escalated to the relevant bodies and effective controls are implemented and monitored.
- **Business planning and budgeting**: Our business planning and budgeting process facilitates the setting of objectives, robust action planning and appropriate allocation of resources. We monitor business plans through regular reporting.
- **Faculties and Divisions:** Our Directors ensure that key risks in their directorates are identified, assessed, and mitigated, and will notify the GET about emerging risks. Improvement actions and risk indicators are monitored regularly at directorate level.
- **Group Risk Register**: The Group Strategic Risk Register is a working document which supports risk assessment and mitigations. It is updated with emerging risks as appropriate. The Risk Register is regularly reviewed by the GET, the Audit and Risk Committee and the Corporation.
- Internal audit: We operate an internal audit programme that is informed by the Strategic Risk Register and supports the annual review of risk management. Internal audit reports and recommendations are reviewed by the Audit and Risk Committee.
- **External audit**: The Audit and Risk Committee receives feedback on how effective our internal financial controls are, as part of the annual audit.
- **Third party reports**: From time to time we engage external consultants to review key business risk areas.

Annual Review of Risk Management

The Audit and Risk Committee undertake an annual review of how effective our internal controls and risk management are and reports their findings to the Corporation. This review considers both past performance and whether the internal controls will be sufficient for future risk management. The review accounts for the following factors:

- **The control environment**: Are our organisational structures, leadership capability and culture suited to our objectives and targets?
- **Ongoing risk identification and assessment**: Do we identify and address areas of high exposure promptly? Do we effectively prioritise risks and allocate resources accordingly?
- **Information and communication**: Are risk management reporting clear and effective? Are emerging risks and breakdowns in our internal controls promptly identified and addressed?
- **Monitoring and corrective action**: Do we take corrective action quickly when an issue arises? Do we learn from our mistakes?

Business Continuity

We maintain a Business Continuity Plan that ensures that we can respond to unexpected incidents which present a significant risk to the Group. This plan identifies key decision makers and pre-agreed strategies for tackling the most likely threats.

References

This policy should be read in conjunction with the following Activate Learning Policies and Procedures:

- Business Continuity Plan
- Strategic Risk Register
- Data Protection and Information Security Policy
- Corporate Ethics Policy
- Health, Safety and Environment Policy