Aon **2020** Independent Schools

RISK REPORT

AON

Table of Contents

About Aon's work in Education 3

Introduction: Building Resilience 4

Section 1: Risk Management Snapshot 7

Section 2: Brand & Reputation 11

Section 3: Staff Wellbeing, Student Safety & Allegations of Child Abuse 13

Section 4: Increasing Competition & Limited Access to Funding 18

Section 5: Cyber Threats & Privacy Data Breach 22

Section 6: Ability to Attract, Engage & Retain Talent 26

Section 7: School Governance & Changes to Legislation 30

Conclusion 35

Additional Resources 36

Contact us 38

Aon for Education

Aon has provided Independent Schools with risk management and insurance solutions over the last 40 years. Our commitment to the sector has allowed us to innovate and deliver competitive products and services.

Risks to schools are constantly evolving, and no school faces a single set of risks for more than a short period of time. Aon's commitment to schools extends to expand and share knowledge and insights on how to best mitigate and transfer risk, including emerging risk.

To have a conversation with one of our expert advisers, contact the Aon school insurance expert in your area.

Building Resilience

This report is based on responses collected from the Aon 2020 Independent Schools Risk Survey distributed to school executives and leaders.

The survey results identified the top five risk concerns nominated by respondents, which have only increased in significance since the 2018 research was conducted.

The resilience of communities and organisations across the world has been severely tested by a series of disruptive events.

In Australia, these included bushfires and floods that threatened lives and livelihoods. This was followed by the coronavirus pandemic, which forced people to recalibrate how we work, educate, live, and interact. Across every aspect of the community, this triumvirate of emergencies has revealed vulnerabilities in the preparedness of many organisations to protect their staff, students and operations during a crisis.

Top Risks identified in Aon's 2020 Independent schools Risk Survey	Movement from 2018 Report
1. Brand / reputation	←→
2. Student safety	←→
3. Increasing competition / decreasing enrolment numbers	←→
4. School governance	↓
5. Changes to legislation	**New**
6. Ability to attract and retain talented staff	←→
7. Access to funding	↑
8. Privacy / data breach	↑
9. Allegations of child abuse	←→
10. Malicious cyber threat (e.g. hacking, ransomware)	↑

Building Resilience

- **Brand and reputation:** During the crisis, the effectiveness of a schools remote learning program delivery (including the reliability of its technology platforms); the rigour of their responses to deal with an infection in their school; and the way they addressed parents' concerns over issues such as fee payments during school closures, all have the potential to cause reputational damage.
- **Student safety:** Some of the risks here include physical exposures to COVID-19; mental health issues arising from changes in learning routines (especially for Year 12 students); and increased exposure to cyberbullying or adult cyber abuse, while learning from home.
- **Increasing competition / Decreasing enrolments:** In an economic downturn, the government sector may pose a greater competitive threat to independent schools, while financial constraints could lead some parents to withdraw their child from a school or cancel a pending enrolment.
- **Access to funding:** In addition to the financial impacts of increasing competition or decreasing enrolments, schools could face additional threats to their income and cash flow due to requests for fee reductions or deferrals.
- **Malicious cyber threat:** The spread of the coronavirus pandemic has been accompanied by a sharp rise in cyber-attacks with criminals exploiting work-from-home security weaknesses; unleashing phishing attacks through bogus emails and websites purporting to offer COVID-19 health advice; and hacking collaboration applications (such as Zoom) to gain access to users' personal data.
- **Governance:** The increasingly complex nature of school management, coupled with a tighter regulatory environment, has led to heightened expectations from the stakeholder community.

Protecting people and operations through risk management

While students will long remember the coronavirus pandemic for school closures and being thrust into a remote learning environment, its impact on the independent schools' sector are much broader and – for some schools at least – will likely be felt far longer.

Building business resilience requires effective risk management strategies, and business continuity planning, that are both focused on ensuring schools can remain viable in the face of disruptive events.

For many independent schools' leadership teams and their Boards, building such resilience will be crucial to securing their long-term future.

To build resilience for times of uncertainty, and to protect people and operations during a crisis, school leaders and their Boards need to foster a risk culture and ensure that risk management planning is not just a one-off event, but something dynamic that remains relevant and effective through regular simulation, testing, and review.

"Schools teach resilience and are resilient by nature. And they're learners. You see schools that in a period of just months, have been through bushfires, through floods, and through global pandemic. From that, they've become more resilient and more focused on their community, and their response to critical incidents is much more embedded in their culture that it was before."

- Tracey Cain, CEO, Australian Public Affairs

Risk Management Snapshot

1. Brand and Reputation

2. Student Safety

3. Increasing Competition/Access to funding

4. Cyber Threats/ Privacy/ data breach

5. Ability to attract and retain staff

6. Governance

Risk Management Snapshot

Although the survey indicates that 71% of schools have a formally approved risk management plan in place, it's not clear what those plans encompass.

Many management teams concentrate their efforts on compliance, and policy and procedure – which are important components within a risk management framework – but lack a more comprehensive plan that can be effectively executed when a real crisis emerges.

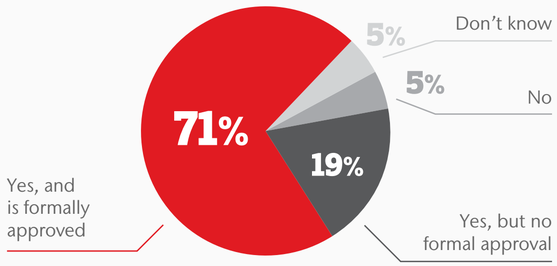
The wide constellation of risks across a school environment range from ensuring the safety and wellbeing of students and staff, maintaining day-to-day operations, and protecting and securing the school's property. A failure to effectively manage these risks could leave the school exposed to financial and legal consequences, and significantly tarnish its brand and reputation.

Given the critical role Boards play in monitoring major risks and assessing any changes to the risk environment, it's disturbing that only 35% of survey respondents believe their Board is strongly engaged around this issue. This finding accentuates the need for mandated Board member governance learning and professional development across all jurisdictions.

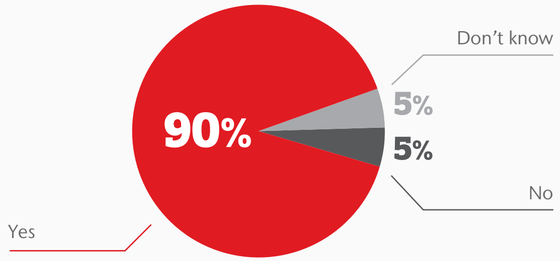
"From a risk management perspective, survey responses over the past five years show a growing risk maturity within the independent schools' sector, but there is still a wide gap between the most mature and the least mature."

- Marcus Vaughan, Director, Growth Strategies, RiskLogic

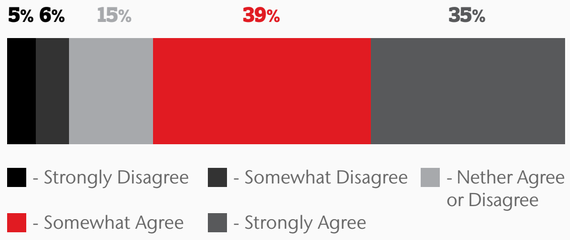
Does your school have a risk management plan in place?



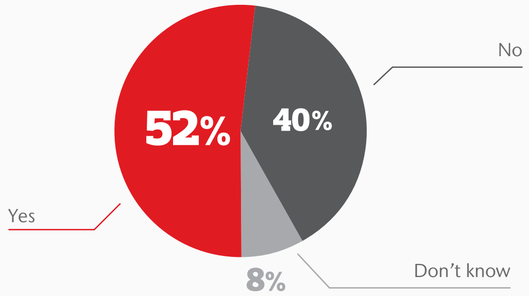
Our school has a documented Critical Incident Management Plan



Our school Board is engaged around risk management



Have you tested your Critical Incident Management Plan in the last 12 months?

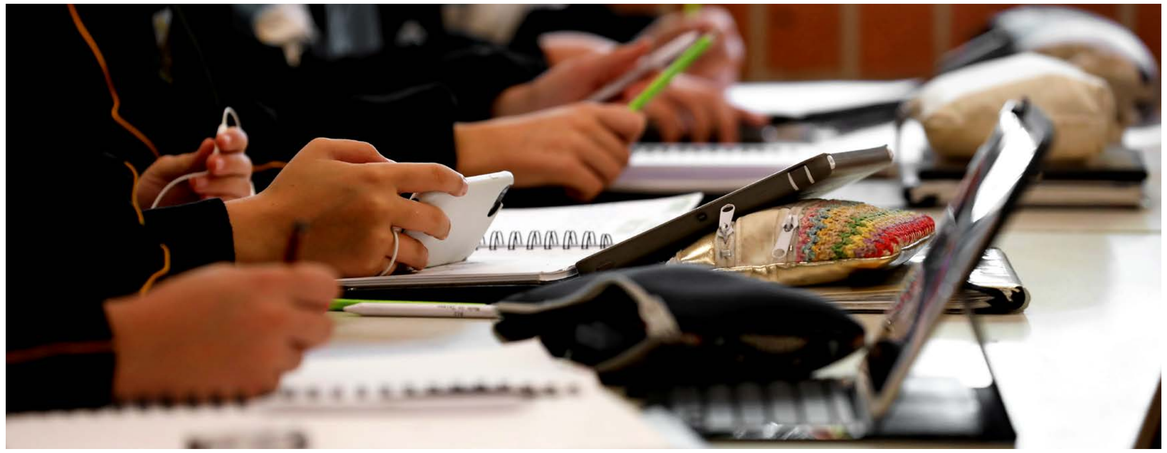


Risk Management Snapshot

The insights gained from risk assessments provide the basis for developing corresponding Critical Incident Management Plans (CIMP) that provide a framework for dealing with an incident or sequence of events that overwhelm the normal coping mechanisms of an organisation.

Even though 90% of schools surveyed have a documented CIMP, only 52% have tested it in the last 12 months. Those that had tested their CIMP prior to COVID-19 would likely have experienced a more assured transition to working and learning from home – and are better able to minimise the impacts to their business operations.

Testing a CIMP ensures that staff can respond with confidence, knowing that they've done this before, and is akin to creating neural pathways around the steps required in responding to a situation as it unfolds. Without testing, the response to a crisis is likely to be far less effective.



[1] https://www.agedcareinsite.com.au/2020/05/how-did-hong-kong-and-south-korea-record-no-coronavirus-deaths-in-aged-care/

Learning from other industries

The benefit of simulation exercises: Zero aged care facilities deaths in Hong Kong during COVID-19, The Guardian

As of early June 2020, there were no reported residential aged care deaths due to COVID-19 in Hong Kong. Despite the country's proximity to mainland China, and there being thousands of positive cases throughout the region, the aged care sector avoided seeing any deaths – a starkly different outcome to that experienced by the sector in most other countries.

According to Professor Terry Lum, head of social care policy at the University of Hong Kong, one of the reasons for this surprising outcome is that ever since the SARS epidemic in 2002/3, all nursing homes drilled infection outbreak scenarios four times a year, and employed an infection controller as standard practice[1].

Each facility was stocked with a three-month supply of personal protective equipment, and staff started wearing masks in January.

Through their risk planning and simulation exercises, these aged care facilities have not only been able to deliver on their promise to providing care to their vulnerable residents, but have no doubt also enhanced their reputation and trust within the community.

BCP vs CIMP:

Business Continuity Planning involves the process of creating a system design to identify and manage potential risks an organisation can face. Critical Incidence Management Planning is focused on preparing an effective response to a specific critical incident, such as a pandemic, in order to minimise the operational impact on the organisation.

Risk Management Snapshot

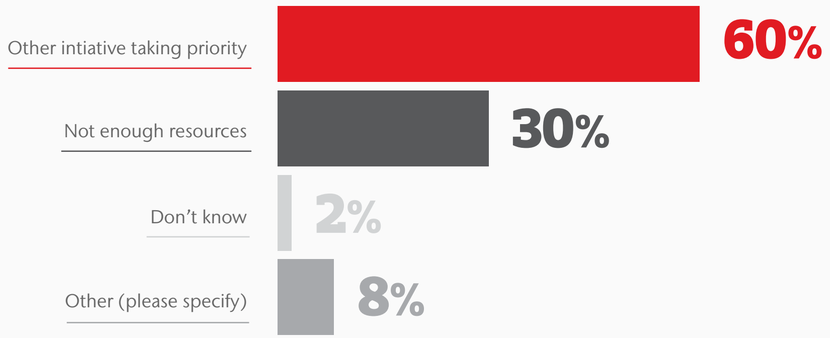
Every risk management plan should be matched to a Business Continuity Plan (BCP), which focuses on reducing the impact of an adverse event on an organisation and restoring its operations as quickly and as safely as possible.

The interconnectedness and importance of these two components of an effective risk management strategy, is clearly not fully understood across the sector, with only 35% of respondents confirming they have tested BCP plans in the last 12 months. The survey results have shown that 65% of schools still have not tested their Business Continuity Plans in the last 12 months.

In light of the business-disrupting impact of the coronavirus pandemic, and given that other incidents will continue to happen (albeit not on such a universal scale), school Boards should ensure that developing a BCP is considered a priority, and where necessary, engage external advisers to work with the business manager and leadership team to put such a plan in place.

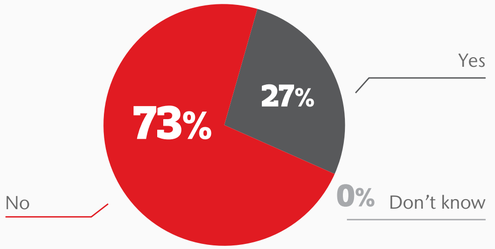
One of the many benefits of BCPs is that they can make it easier to estimate the costs of executing a contingency strategy. These insights can also be used to ensure the level of Business Interruption cover is adequate, thus further protecting the school from the financial impacts of an adverse event.

What would you say is the main hurdle in developing a documented Business Continuity Plan for your school?

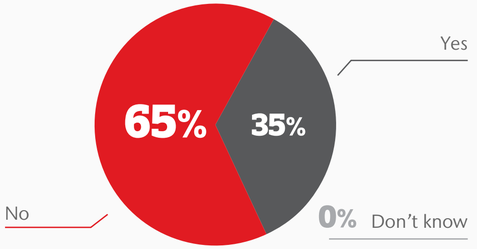


Does your school has a documented Business Continuity Plan?

Our school has invoked a Business Continuity Plan in last 12 months



Our school has tested its Business Continuity Plan in last 12 months



Risk Management Snapshot

In a crisis, a BCP can only be effective if it's been validated and recently tested. Scenario testing should be undertaken every 12 months, as well as staff training to ensure those with designated responsibilities within the BCP understand their role, and that all other members of staff have an appropriate level of capability to respond when required.

A BCP needs to be regularly revised to reflect fundamental changes within the school (such as the construction of a new building, substantial changes in student numbers, or a move to cloud-based computing). As new and emerging risks are identified, appropriate responses to them should also be incorporated into the BCP.

"Business continuity plans are often out of date and basically ineffective as they've either been drafted ten years ago, haven't been validated, or haven't been tested. In a real-life situation, many schools may find that these plans won't be as effective as they should be.

"Perhaps COVID-19 will have elevated the importance of having proper risk management programs in place."

- Richard Slatterie, Client Manager, Aon

The importance of risk management in the current education insurance market:

Over the past few years, insurance placements for the education sector have become increasingly challenging.

The most significant cost to insurers has been the rise in catastrophic events (especially floods and bushfires). When these move through communities, they usually hit schools, and hit them hard.

From a workers' compensation perspective, slips, trips, and falls, as well as muscular skeletal injuries remain a concern, with the physical condition of an ageing workforce as much a contributor to these as is the physical condition of the school environment. Likewise, mental health related claims, and those for psychological injuries have spiked significantly.

Astute risk management that works to identify and eliminate preventable risks, is the first step in reducing claims and minimising future premium increases. In addition to ensuring reasonable cover and protection are in place, it's important that cover is appropriate and delivers value.

Top Tips:

In the aftermath of an event that requires the implementation of a CIMP or BCP, it's important to conduct a formal debriefing to compare the documented process with the response. The questions to ask include:

- What worked for us, and what didn't work?
- What things should we continue doing, and what should we stop doing?
- What can we implement to make our response to future events more robust?

Taking the opportunity to learn from the responses to an actual event, will enable schools to develop better BCP and CIMP for building resilience against risks.

Brand & Reputation

A school's position in the community is influenced by how it manages a series of other risks such as student and staff safety and wellbeing, business interruption, and financial governance, as well as its ability to attract and retain great talent and deliver solid academic outcomes.

In essence, brand and reputation are two complementary concepts. Brand itself is often more a symbolic representation (such as a school's crest emblazoned on a uniform), that provides an immediate recognition of that organisation. Reputation, however, creates the value within that brand, and over time becomes the driver of emotional responses toward the brand.

For schools, reputation is largely a measure of how well they execute on their trusted position to provide duty of care to students and parents. A breach of that trust – which can become public very quickly – can lead to long term damage to the school's brand and reputation.

Concern for brand and reputation should inform the way all schools are managed and governed. It should be a deeply embedded cultural response, however, that response should be based on ensuring student safety and duty of care come first, rather than on taking shortcuts to stem the reputational outfall should something go wrong.

"You can lose in the court of law and get fined. Some people might be terminated, and perhaps your insurance will need to make a payment. These are all very predictable things. If you have well trained professionals, you can put these things to rest and get on with business."

- John Morgan, President and CEO, Japan and Asia, Hill + Knowlton Strategies

If you lose in the court of public opinion, at the end of the day, trust is eroded. When you lose trust, things just don't happen, and you may well be on your way to being out of business[2].

The risk of reputational contagion

Although brand and reputation are normally considered in the context of an individual organisation, it should also be viewed as a collective concern and responsibility. When more than one school has an incident or a series of incidents, there is the risk that this breach of trust might be seen as symptomatic of a particular brand or group of schools, or even of the entire independent schools sector.

"It's surprising that there are still some schools that acknowledged the importance of maintaining their brand and reputation, but don't really think about how they actually manage it. We try to emphasise that it's not a risk of itself but is impacted by events that are obviously critical to schools, and especially their trusted duty of care to students and parents. Brand and reputation risk isn't going to go away. It's simply going to become more complex."

- Kevin O'Reilly, Director, Industry Verticals, Aon

[2] Managing Brand and Reputational Crisis in the Age of Disruption, The Risk Revolution , Aon Australia

Brand & Reputation

Minimising the firepower of social media

The rise of social media has changed the pace at which a reputational risk may eventuate. Social platforms are often used as the first avenue of expressing issues, prior to contacting the school principal directly.

Commentary direct from the public avoids the process constraints of journalists and traditional media organisations. Anybody can publish anything. As a result, a misinformation campaign is exceedingly difficult to deal with, especially because schools are unable to effectively respond on social media due to the risk of breaching privacy. This makes it much harder to deal with reputation risk.

Many independent schools are investing time and resources into developing relationships with their school communities, and establishing forums for open discussion, feedback, and complaints, so that parents don't need to air their concerns to either social or traditional media.

"When a crisis occurs, if the school principal doesn't put out a clear media statement, the media will simply keep trolling other people to find out more. Whether it's right or wrong, they'll just keep asking members of the school community – even retired teachers – and using this information to create their own version of the story. The reputational damage from this can be quite powerful."

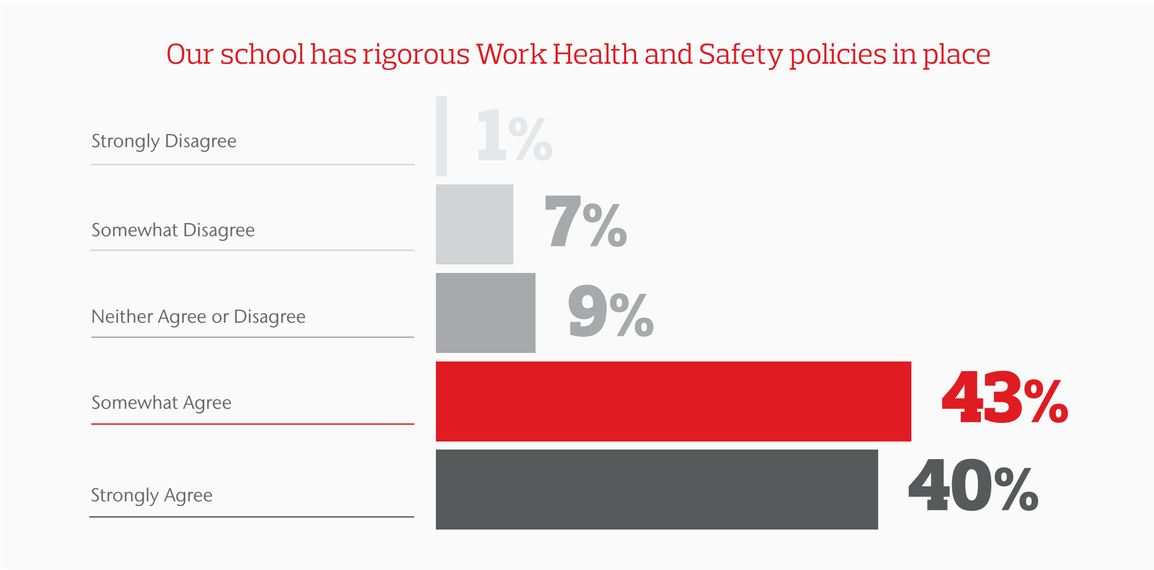
- Alison Smith, Regional Director, Aon

Top Tips:

1. Brand and reputation should sit on the risk register and be discussed with some level of detail at Board level.
2. In addition, there should be a formal process in place to check and identify reputational risks so that they receive Board level attention.
3. Brand and reputation are such a complex and concerning risk category that the Board chair and the head of school should drive response and engagement.
4. Exposures to brand and reputation can be mitigated by running simulations and developing responses to different scenarios. Having a pre-coordinated practice of being able to react to a situation can help prevent a brand and reputation issue from getting out of control.
5. Crisis communications training should be provided to a key member of the leadership team so they can quickly provide clear statements to the media as the situation unfolds.

Staff Wellbeing, Student Safety & Allegations of Child Abuse

If brand and reputation is a key concern for independent schools' leadership teams, a comprehensive approach to ensuring the safety and wellbeing of students and staff is integral to mitigating that risk.



While the vast majority of schools surveyed (83%) say they have comprehensive work health and safety (WHS) policies in place, there is nonetheless a worrying number that don't seem to be sufficiently engaged in ensuring they meet the ever-increasing WHS requirements of governments and regulatory authorities.

Establishing effective WHS policies and processes is a cornerstone to creating healthy and safe work and learning environments for staff, students and school visitors. Developing a sound WHS policy requires a whole-of-school approach that extends from the boardroom to the playground.

Standalone WHS policies could be of little worth if they are not tailored to the individual needs of that school, or fully understood, followed, and enacted by all members of staff. Likewise, when an injury or illness occurs, the WHS policy should be reviewed and – if appropriate – updated to minimise the risk of a similar incident occurring.

"Managing the multiple aspects of Work Health and Safety remains a challenge for many schools. In addition to workers' compensation issues relating to staff, and their duty to ensure the health and safety of teachers, students, and visitors, schools are seeing an increase in psychological injuries. However, as mental health issues can be both invisible and fluid, they are harder to manage and address. Of additional concern, due to changes in WHS legislation over recent years, a serious accident or injury could potentially expose business managers, principals and Board members to personal legal liability."

- Vanessa Hilton, Client Manager, Aon

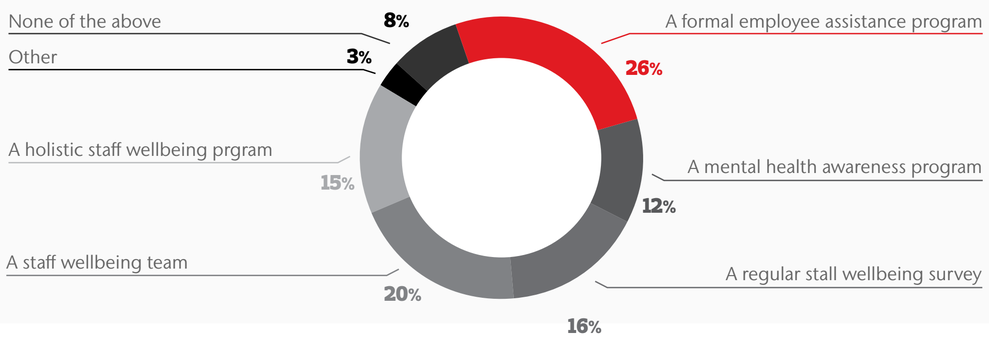
Staff Wellbeing, Student Safety & Allegations of Child Abuse

Uptake in staff wellbeing programs

The survey revealed that 85% of schools have implemented at least one type of staff wellbeing program, with 22.3% indicating they have implemented all five programs nominated in the survey. Employee assistance programs are the most widespread at 49%, but it's of great concern that 8% of respondents don't offer any wellness programs at all.

When wellbeing programs are delivered as part of a positive and supportive workplace culture, they not only boost employee health and morale, but can also reduce absenteeism, workplace injuries, and workers' compensation claims, while underscoring a nurturing workplace culture and boosting morale.

Regarding staff wellbeing, has your school implemented any of the following?



Mental health-related issues continue to rise

In its list of occupations most at risk of work-related mental health conditions, Safe Work Australia lists teaching as the second highest, accounting for 8% of serious mental health condition claims[3]. It's likely that mental health and psychological injury-related claims within the schools' sector may rise in the aftermath of the coronavirus outbreak.

Interactions with parents are also becoming more challenging, with our research showing that parents are becoming more demanding in their expectations of teachers. As a result, teachers increasingly need to act as counsellors and conciliators, even though they aren't necessarily equipped with the skills to diffuse such conflict.

Teachers are generally sympathetic, emotional, and caring people who are attracted to teaching because they want to make a difference in the lives of their students. Aon's Independent Schools research over the past years has indicated an increase in the topic of teachers' mental wellbeing.

Yet, despite the importance of mental health to overall wellbeing, only 12% of schools surveyed offer a mental health awareness program.

[3] https://www.safeworkaustralia.gov.au/doc/infographic-workplace-mental-health

Staff Wellbeing, Student Safety & Allegations of Child Abuse

The National Redress Scheme

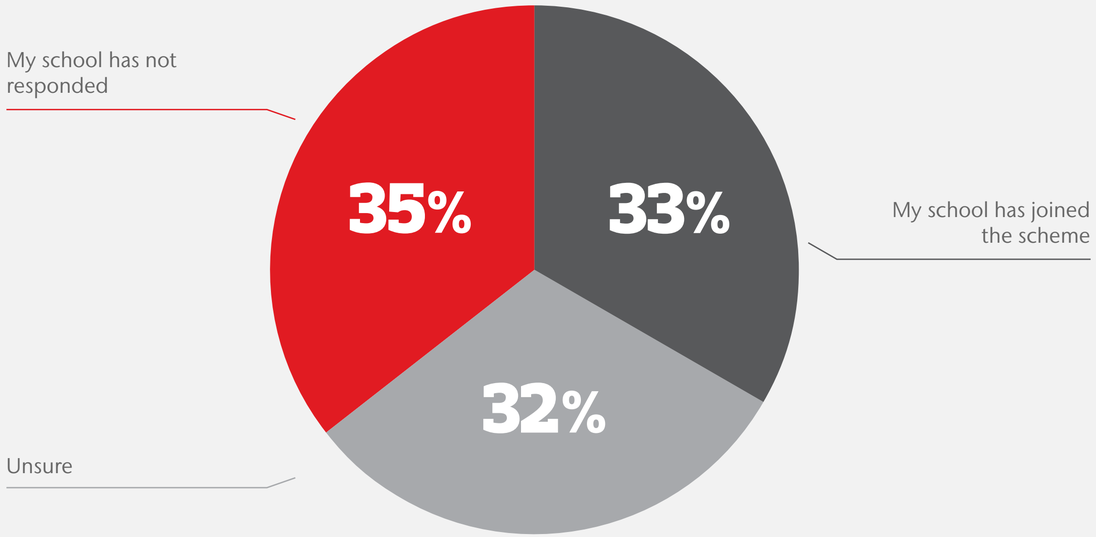
The National Redress Scheme was established in 2018 by the Australian Government in response to one of the key recommendations of the Royal Commission into Institutional Abuse of Children. The Scheme provides support to people who experienced institutional sexual abuse; holds institutions accountable for this abuse; and helps victims of such abuse gain access to counselling, a direct personal response, and a Redress payment.

Every institution named in the Royal Commission report, or named in a subsequent application to the Scheme, is expected to join the Scheme, and must have provided a written statement setting out their intention to join it by 30 June 2020 – and then join as soon as possible, but no later than 31 December 2020[4]. Failure to join may result in financial sanctions and changes to an organisation's charitable status.

Undoubtedly, independent schools have been incredibly focussed on child protection for some time now, and the accreditation process requires child protection policies to be updated and followed. However, while there is a general perception that the Royal Commission brought to light every case of abuse, historic cases and allegations will continue to surface.

There is some anecdotal evidence that some victims of abuse who have not shared their experience with their parents, may wait until the parents have passed-away before they bring allegations, rather than burden them at this late stage of their life.

How has your school responded to The National Redress Scheme?



[4] https://www.nationalredress.gov.au/applying

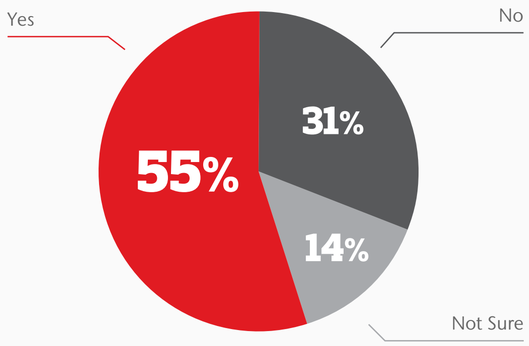
Staff Wellbeing, Student Safety & Allegations of Child Abuse

Concussion risk management

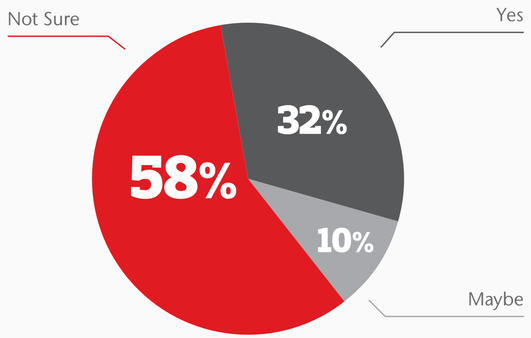
Concussion risk is not limited to AFL, NRL and Rugby Union.

Concussion risks stretch across a wide range of physical activities, such as: gymnastics, equestrian, and even standard slips, trips and falls.

Is your school exposed to concussion risk, such as through sport?



Do you have a Concussion Risk Management plan in place?



Sport and physical education are integral to most independent schools' curricula. In addition to the health benefits of promoting physical fitness, participating in sports activities can assist cognitive development, personal wellbeing, and social integration. Studies also show that academic achievement is maintained or enhanced by increased physical education, physical activity, or sport[5].

However, over the last five years there's been an increasing awareness around concussion risks in sport in general. It is estimated that across all football codes in Australia, the probability of concussion is one in seven[6].

Concussions can occur at any age, however, children are more susceptible than adults, because their brains are not yet fully developed and thus more vulnerable to injury.

While concussion is not a new risk for schools, the growing understanding and awareness of the long-term health consequences of concussion, have made it an issue that needs to be better understood and comprehensively managed.

The survey shows that although 55% of schools acknowledge exposure to concussion risk, only 32% have a concussion risk management plan in place.

"When it comes to ensuring the physical safety of students – minimising slips, trips and falls as well as muscular skeletal injuries, the biggest challenge for schools is that young people are developing their competencies and don't yet have fully formed prefrontal cortexes, which is why children will do some stupid stuff. However, you want to create an environment that's safe but not constricted. There needs to be a way for them to explore the boundaries – so it's the challenge of balancing that risk."

- Peter Salmon, Digital Director, Broking, Aon

[5] https://www.icsspe.org/system/files/Stead%20and%20Neville%20-%20The%20Impact%20of%20Physical%20Education%20and%20Sport%20on%20Education%20Outcomes.pdf

[6] https://sportconcussion.com.au/policy-development/

Staff Wellbeing, Student Safety & Allegations of Child Abuse

Clusters and the second wave

Since the reopening of schools in May 2020, there have been numerous individual school closures due to a member of the school community testing positive to COVID-19. These have caused extended interruptions, leading to short periods of stay-at-home learning, while facilities are deep cleaned.

Like workforces, schools will need to adopt and enforce heightened health and cleaning protocols for the foreseeable future. However, schools face the additional challenge of social distancing protocols, while staggered or part-time schedules may create inconsistent learning environments.

In addition, there may be a need to develop safety protocols for those teachers at greater risk of developing COVID-19.

Schools also need to a have a pre-coordinated practice in place to respond to the breakout of a cluster of infections within the school. In addition to a strong focus on minimising infection spread to students and staff, such a plan should also consider the reputational consequences of not being prepared.

"Over the last couple of years, we've seen a significant spike in mental health and psychological related claims and injuries. Its uncertain if this is as a result of changes occurring within schools and the pressures on education professionals or if this is a natural consequence of what is happening across the community in general. Right now, teachers are under increasing pressure to maintain students education standards as a result of COVID-19 and ongoing public health response activities applied by public health authorities. Many also fear they are under far greater risk of explore to COV?ID-19, and feel vulnerable going back into the workplace, knowing they're in the frontline. It's likely this has resulted in greater anxiety for teachers and school staff."

- Mario Machado, National Practice Leader – WHS, Aon

Travel Risk

COVID has emphasised the importance of a robust travel assistance and travel insurance program. In order to keep students and staff safe, schools have cancelled, postponed or amended scheduled trips and excursions. This has left some schools financially burdened whilst others who have invested in sound insurance protection have been indemnified. For the remainder of 2020 and into the future, prior to booking, any trips need to be carefully investigated with appropriate advice sought on the risks to student and staff safety. Contact Aon for further information on cover for travel-related risks.

Increasing Competition & Limited Access to Funding

The capacity of independent schools to deliver high quality education programs is inextricably linked to their revenue and their capacity to access adequate levels of government funding.

And while financial security is a constant risk concern for the sector, a school's ability to attract sufficient fee-paying students is also highly dependent on its competitive positioning, and its brand and reputation risk management.

The survey responses show that schools continue to be concerned with their financial stability, nominating decreasing enrolments and increasing competition as the third most pressing risk, and access to funding as their fourth. While these were existing concerns for leadership teams, they have been further compounded post-pandemic outbreak through disruption to program delivery and a potentially significant economic downturn.

Even in the best of times, most schools are balancing tight budgets and looking for creative ways to utilise limited resources effectively. However, over the next twelve months, Boards will need to be diligent in ensuring their financial house is in order and may need to realign their strategy to remain financially stable.

One of the key issues the industry will be faced with is capacity of parents to pay fees, and the ability of schools to sustain at-risk enrolments until that capacity has been restored.

Strength in sector support

The depth of support for independent schools within their own communities may provide a much-needed buffer against the worst impacts of the forthcoming economic headwinds.

Increasing Competition & Limited Access to Funding

Maintaining enrolments is crucial

Independent schools are essentially a pastoral service and will need to vigorously examine the ways they can minimise any risks that may exist relating to loss of enrolments. If they don't put their students and their communities first, they will leave themselves vulnerable to competition from non-fee-paying schools. The actions they take will also have a direct and lasting impact on brand and reputation.

In particular, where a student has been in a school for a number of years, or is in years 11 or 12, it is incumbent upon schools to do everything they can to maintain that student's enrolment and not subject them to the stress of changing schools at a time when there may already be trauma at home due to the loss of jobs or the loss of a business.

"During the lockdown / remote learning period of the 2020 pandemic, a number of schools proactively applied fee discounts rather than waiting for parents to request fee relief. There is evidence that the social media kudos these schools received has already led to increases in their enrolment waiting lists."

- Andrew Leahy, Branch Manager, Aon

Other strategies to consider might include a deferral of fees (even with fees paid after the child leaves the school), discounts for advanced fee payments (which will enhance cash flow), a reduction in fees on as-needs basis, or – if there is capacity – the use of bursaries.

Importantly, schools need to communicate openly and clearly with parents in a timely manner about fee payments and relief options. Here, the pastoral element – knowing and understanding the school community – becomes even more important. This will allow schools to be proactive in their engagement with families and therefore reduce the risk that parents simply take their children out of a school because they are too proud to ask for assistance.

Maintaining enrolments and continuing in-person classroom teaching are also vital to ensuring Government funding levels are maintained.

"During the 2008 financial crisis, there was an increase in enrolments in many larger, high-fee schools and smaller, low-fee schools. While some mid-fee schools with populations of around 100 students experienced losses, in general they were quite small."

- Anonymous Industry Specialist

Increasing Competition & Limited Access to Funding

Changes in the funding regime

A new Commonwealth independent school funding model will see a reduction of approximately $600 million in funding to the sector over the next ten years[8]. The new capacity-to-pay model is based on the incomes of parents whose children attend a school, while the previous socio-economic status (SES) measure assessed the need for funding based on the community in each school's catchment area.

Despite the overall funding decrease, many schools in low SES areas will receive significantly more support[8]. However, a middle group of higher-fee schools in certain regional and metropolitan locations will see a considerable reduction in their level of funding. In general, high-fee urban schools in high socio-economic areas won't be significantly impacted as they already receive only minimal Government funding[9].

Across the sector, funding will be indexed by 3% each year, for the next ten years, and a 'choice and affordability fund' worth around $460 million has been negotiated by sector associations with the federal government. This fund will be used to help schools develop a sustainable business model as they transition to a lower Commonwealth funding regime[10].

[8] https://www.education.gov.au/what-quality-schools-package-and-what-does-it-mean-my-school

[9] https://www.education.gov.au/what-australian-government-doing-support-students-regional-and-remote-schools

[10] https://www.education.gov.au/what-choice-and-affordability-fund

Increasing Competition & Limited Access to Funding

Competition and disruption

Economic uncertainty creates deep concern about maintaining current and future sources of revenue and heightens the need to be aware of competitive threats.

Media coverage of the queues outside Centrelink offices at the commencement of the COVID-19 lockdown, together with Australian Bureau of Statistics figures in May showing large increases in the rates of both unemployment and underemployment, provide a telling picture of the widespread economic distress being felt by families across all communities[11].

In such an environment, non-fee government schools may present a significant competitive threat to certain sections of the independent schools' sector. For some of the smaller independent schools, the competitive threats may also come from other schools in the same catchment area that appeal to a similar socio-economic group. For this cohort, there will be an increasing need to look for differentiators that deflect from the focus on fees.

The sector should also consider the future potential competitive threat of low-cost, high-quality micro-schools entering the Australian education market. Growing in popularity in the United States, these schools focus solely on providing students with access to the best teachers across subjects tailored to a student's needs and vocational ambitions, while keeping costs low by not offering anything other than tuition.

Alternative competition such as this may put revenue models under pressure and force schools to better align their offerings to match the type of learning a new generation of students may want, and deliver the outcomes parents expect from their investment in their child's education.

Top Tips:

Maintaining financial viability in an economic downturn

1. Develop a strategy for offering fee relief, fee discounts, and other ways to maintain enrolments. Examine the appropriateness of your current non-payment of fees policy.
2. Plan and model downside scenarios – what if x% of fees are not paid on time, what if enrolments fall by y% – so you can better anticipate funding requirements.
3. Understand the impacts that changes in enrolments or teaching delivery may have on your Government funding.
4. Utilise trusted professional advisers to assist in stress testing your key assumptions.
5. Engage openly and ongoingly with key stakeholders, including parents, staff, landlords, banks, and regulators

[11] https://www.abs.gov.au/ausstats/abs%40.nsf/mediareleasesbyCatalogue/F00771E26218DFB1CA258479001AAD2E#:~:text=Employment%20falls%20by%20a%20further%20227%2C700%20in%20May,-Seasonally%20adjusted%20employment&text=Unemployment%20increased%20by%2085%2C700%20people,5.2%20per%20cent%20in%20March).

Cyber Threats & Privacy Data Breach

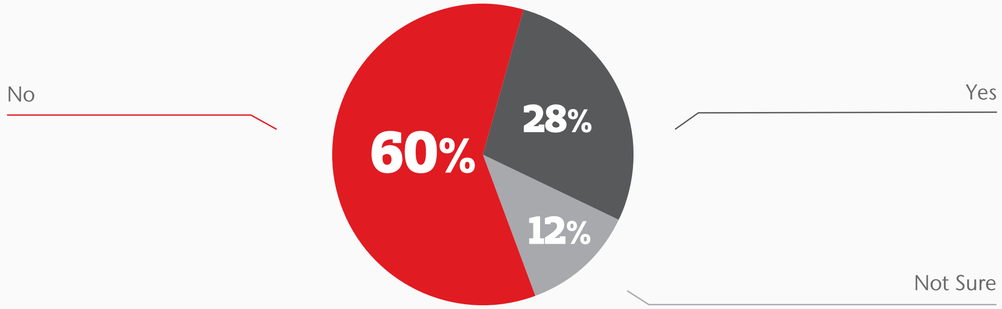
Technology plays a crucial role in almost every aspect of a school's operation and the current generation of digital-native students expect classroom access to digital resources that inspire creativity, facilitate communication, and simplify collaboration.

Given the importance of maintaining a robust and secure technology environment, it's not surprising that cyber-attacks, privacy breaches, and IT systems failure, are ranked amongst the key risk concerns for school leadership teams. While such incidents have the potential to impact many different aspects of a school's operation, and may compromise the safety and privacy of staff, students, and their parents, they can also lead to significant brand and reputation damage.

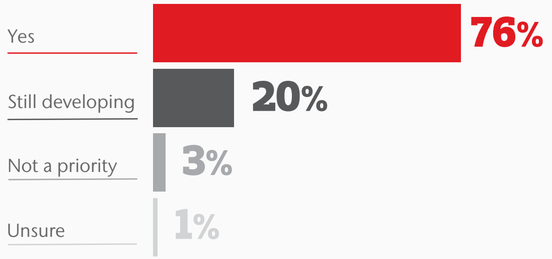
Yet despite this, 24% of schools surveyed are either: still in the process of developing a plan to implement preventative measures around cyber security and control; believe that such security is not a major concern; or don't have such plans in place.

The survey also revealed that 28% of schools have experienced a cyber-attack, while 68% are concerned about a future cyber-attack.

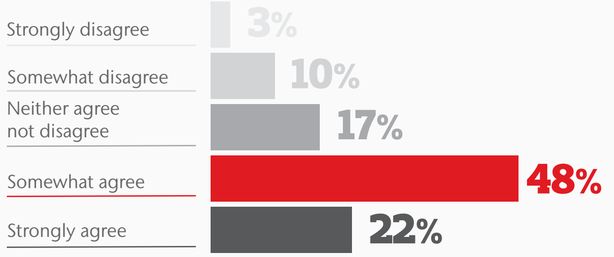
Has your school been the subject of a cyber attack?



Does your school have preventative measures in place around cyber security and control?



"I am concerned about my school being subject to a future cyber attack"



Cyber Threats & Privacy Data Breach

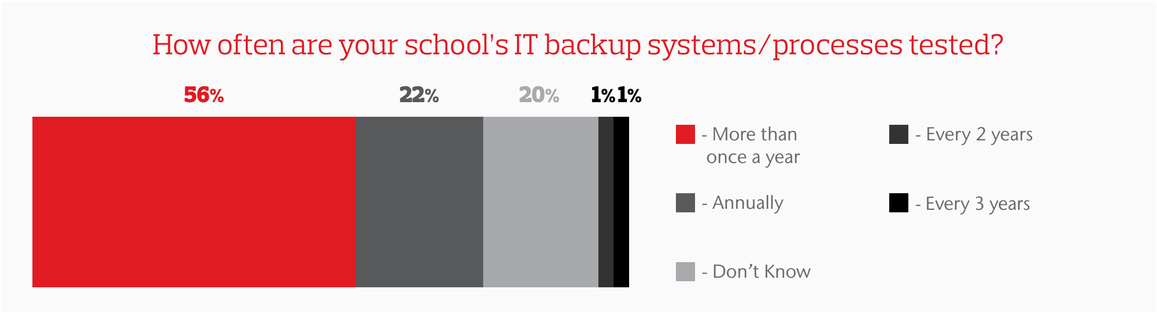
Independent schools remain an attractive target

The rich repository of extremely sensitive personal and financial information held by independent schools (especially in relation to students and their parents), makes them an extremely attractive target for cybercriminals.

Attacks on these schools are usually motivated by financial gain, such as through:

- Selling personally identifying data to other criminal groups
- Demanding a ransom for unlocking encrypted files
- Diverting parents' school fee payments into the attacker's account
- Committing invoice fraud against the school as well as the parents

Schools may also be perceived as having less robust IT security, and with everyone from four-year-olds through to late teenagers using virtual collaboration tools, one infected laptop can easily provide hackers with backdoor access to the school's IT systems.



The survey revealed that 56% of schools test their IT back-up systems and processes more than once a year, and 22% do so annually. A further 20% don't know whether they are tested, while the remainder did so every two or three years.

An increase on attacks during COVID-19

Reports from multiple companies involved with threat intelligence reveal a massive upsurge in malicious cyber-attacks following the outbreak of Covid-19 [12, 13]. The learn-from-home environment has exposed security weaknesses, and the widespread use of communication and collaboration software has provided more attack vectors for criminals to gain access to an organisation's IT system.

There has also been a rise in phishing, vishing, and smishing (which use bogus emails, telephone calls, or text messages purporting to be from a trusted entity, to trick recipients into sharing confidential or sensitive information), while ransomware attacks have grown – and not just in number, but also in the size of the ransom being demanded. Both these attack methods are often used against schools.

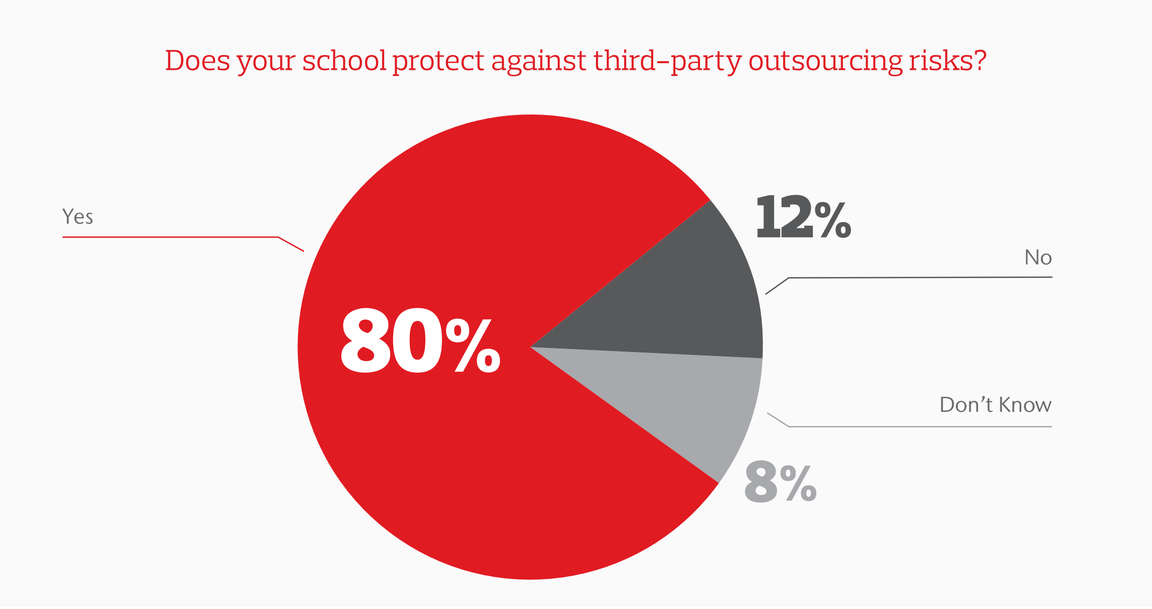
Additionally, attacks have become more sophisticated and complex, with criminals increasingly registering fake domains and redirecting their victims to websites that look authentic and trustworthy. There has also been a rise in 'spear phishing' attacks, where the attackers do extensive research and reconnaissance on their eventual target.

[12] https://home.kpmg/xx/en/home/insights/2020/03/covid-19-staying-cyber-secure.html

[13] https://aoninsights.com.au/covid-19-cyber-risk-implications/

Cyber Threats & Privacy Data Breach

When cyber risk isn't taken seriously enough, and there hasn't been sufficient investment in risk management and mitigation, it becomes a question of whether due care has been practised. And increasingly, regulators and insurers view cyber risk as a Directors and Officers liability issue.



"While most organisations don't ignore cyber risk, they don't take it seriously enough. As a result, they don't invest as much as is needed, and therefore don't practice due care."

- Chris McLaughlin, Director, Aon Cyber Solutions

The uptake of cloud-based computing and managed services within the independent schools' sector has grown substantially in the past two years, with the report showing that 80% of schools now utilise third-party services, up from 60% in 2018.

From a risk-management perspective, it is important that school leadership teams and Boards understand that accountability and responsibility remain with the school and cannot be outsourced to a third party.

When choosing third-party IT suppliers, due diligence is vital – reliance on Service Level Agreements (SLAs) and contracts doesn't provide sufficient assurance – and the supply chain risks need to be fully understood. In addition, the client organisation is usually responsible for managing the cloud service controls and configuring them in a way to meet their data security requirements.

Cloud service providers often market themselves to certain industry groups, and while this has advantages, if a vulnerability is exploited in one school's system, it can open the same vulnerability to others within that provider's ecosystem.

The Zoom video conferencing platform, widely used by schools during the COVID-19 lockdown, was hacked at the beginning of April this year, with 500,000 user accounts offered for sale on the dark web[14].

[14] https://www.bleepingcomputer.com/news/security/over-500-000-zoom-accounts-sold-on-hacker-forums-the-dark-web/

Cyber Threats & Privacy Data Breach

Building cyber resilience in the middle of a crisis

COVID-19 has demonstrated the importance of developing risk management strategies to minimise the threat of disruptions during an emergency or crisis. Some of the keys to building such cyber resilience include:

1. Use up to date, patched, VPNs for all remote access to the school's internal systems.
2. Ensure that third-party providers and internal IT people are keeping network patches up to date, to mitigate vulnerabilities and weaknesses.
3. Consider the value of engaging a managed service security provider that offers threat monitoring to identify suspicious external and internal activity across your network.
4. Review your cyber risk management plan to see if risks need to be reprioritised due to the changes in the risk environment.
5. Ramp up education awareness campaigns with regular and relevant communication to all staff. Develop tips for families with a focus on safe practices for children working from home.

Top Tips:

Providing a secure work, or learn-from-home environment

- Connect staff and students to the school's internal systems via a virtual private network (VPN) when they are working or studying from home
- Implement firewalls and put controls on what specific users may access
- Test your VPN to ensure you have enough bandwidth to support all staff and students, in the event there is a return to remote work and study
- Ensure antivirus and security software is installed on all laptops, and that these are regularly updated and patched.

Top Tips:

Selecting third-party IT suppliers

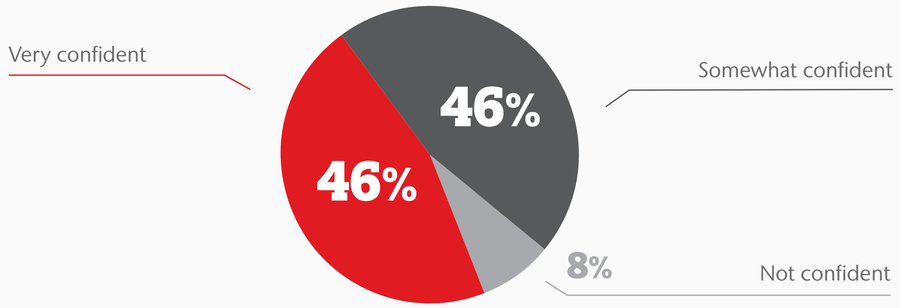
- Understand the functionality of what is being procured, and be clear about which party is responsible for various configurations and controls
- Research the organisation's reputation, and ascertain they can provide the services long-term
- Request evidence of ISO 21001 or other certification and determine whether they've had any previous service breaches.

Ability to Attract, Engage & Retain Talent

Finding, hiring, and retaining the right talent remains a challenge for most independent schools, with only 46% expressing great confidence in their recruitment procedures.

The disparity in levels of confidence around talent and engagement practices across schools, is likely influenced by the variance in the size of student populations across the sector, where 36% of schools have fewer than 200 enrolments, and a further 44% have between 200 and 1,000[15].

How confident are you that your school has the right procedures in place to hire and retain great talent?



In smaller schools that don't have a dedicated human resources manager (or department), the people charged with hiring and inducting new recruits may not have the skills required to manage that process, or to deliver on the expectations of young graduates.

More concerningly, the entire schools' sector continues to be adversely impacted by the decades-long decline of teaching as a career of choice, with high achievers choosing professions with better pay and greater challenges – even though they may also have had an interest in teaching[16]. Those who are good at learning are often better placed to teach, but according to a Grattan Institute report released in 2019[17], only 3% of high achievers choose teaching for their undergraduate studies, while 19% choose science, 14% health and 9% engineering.

The effects of this reduced pool of quality graduates is further compounded by the attrition rate during initial teacher education, as well as within the first five years after graduation. A 2016 study by the Australian Institute for Teaching and School Leadership (AITSL)[18] concluded that factors driving early career attrition include:

- Unstable patterns of employment
- Heavy workloads
- The increasing complexity of a teacher's work.

The study also found retention rates are higher when graduate teachers experience:

- A supportive school environment
- Stable permanent employment
- Adequate pedagogical preparation.

[15] https://isca.edu.au/about-independent-schools/about-independent-schools/independent-schools-overview/

[16] https://www.abc.net.au/news/2019-08-26/why-high-achieving-students-reject-teaching-careers/11447172

[17] https://grattan.edu.au/wp-content/uploads/2019/08/921-Attracting-high-achievers-to-teaching.pdf

[18] https://www.aitsl.edu.au/docs/default-source/research-evidence/spotlight/spotlight---attrition.pdf

Ability to Attract, Engage & Retain Talent

Pay and benefits

One of the broadest recruitment obstacles for independent schools is to think beyond the singular lens of pay, and a focus on whether their benefits program is comparable to that of other schools.

There is a great deal of transparency in the sector around salaries, but the first step to attracting and retaining the right people is to determine what skills, behaviours, and capabilities are required to build on and execute the school's strategy. Doing this provides a better understanding of what an ideal candidate looks like and enables an appropriate program of attraction and retention to be developed. For teaching positions, opportunities for ongoing professional development, and the prospect of better work/life integration, should be integral to that offering.

In general, those attracted to teaching tend to be highly relational and altruistic people with a deep care for the wellbeing of children and students. Many are also motivated by a moral sense of duty to make society better through education.

While offering a competitive salary is important, dedicated teachers looking to advance their careers, are often seeking opportunities to do interesting work, or to be aligned with a particular approach to learning or education.

"In their recruitment, some schools tend to look for a background of performance in similar types of schools. They look into the past history to see themselves, however that may often significantly diminish the pool of people they can attract and retain. By looking into the future versus the past you can focus on what you want them to deliver rather than what has been done in the past. By doing that, you open-up the available talent pool to yourself".

- Simon Kennedy, Partner, Rewards Solutions, Aon

Building leadership and skills capacity

The quality of teaching delivered by many independent schools is reliant on the skills of a small core of highly accomplished long-tenured teachers, many of whom may have 30 or more years of experience. In contrast, the remainder of a school's teaching staff is often much younger and less experienced.

As the older cohort move toward retirement (or leave the profession prematurely due to stress or burnout), an experience gap becomes evident, leaving schools at risk of not having enough skilled, tenured people to fill those positions and provide the continuity in teaching delivery that students and their parents expect.

Ongoing leadership development should occur through the four career stages (graduate, proficient, highly accomplished, and lead), to build the leadership and skills capacity that will allow existing teaching staff to be ready to take on more senior positions, as they arise.

A commitment to developing capability also increases engagement and can assist a school attract a higher calibre of talent when recruiting. In turn, this can positively impact brand and reputation by enabling the school to maintain consistency in its academic offering.

Ability to Attract, Engage & Retain Talent

Refining performance reviews and management

A small majority of schools (56%) conduct annual reviews of employee engagement, which is only a very slight increase on the 2018 survey results, while just over 40% of respondents believe they are effectively utilising insights gained from these reviews to help inform their strategic decision making.

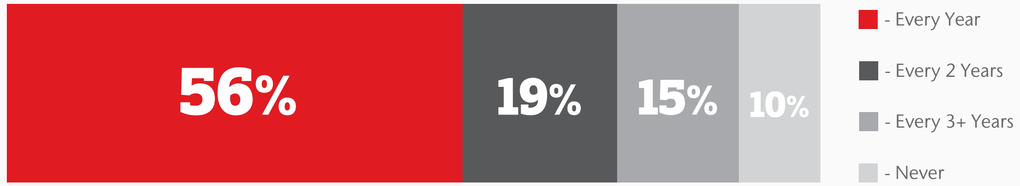
Again, these results may reflect the difference between schools that have a strong and active HR department and/or a commitment to developing the leadership skills and ways of being that build relationships and develop people, and those that don't.

The recent literature[19, 20] around the benefits of performance review and management calls for ongoing informal conversations rather than a very formal process. This might include middle leaders creating high performance expectations aligned to school and student outcomes - as well as having more frequent conversations with their colleagues about performance and personal growth points. However, many middle leaders find this one of the most challenging leadership aspects of their roles.

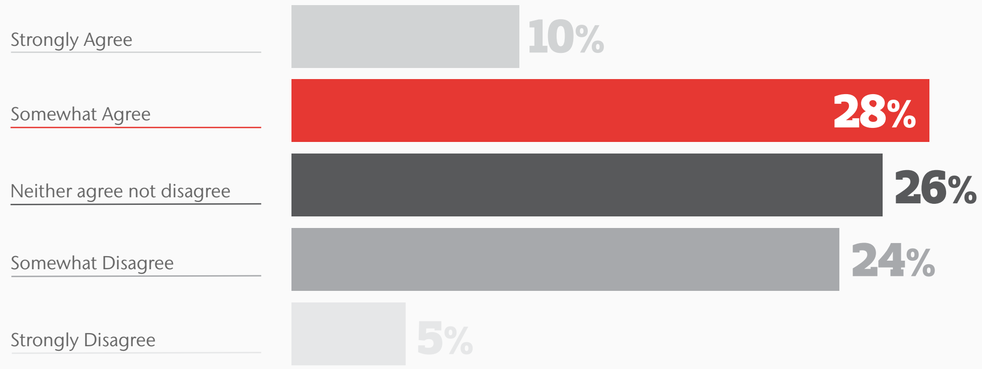
"Schools that purposefully pursue engagement with the employee lifecycle in an authentic and developmental way, are more likely have a culture where staff motivation and performance is kept high. Accordingly, this influences the school to be viewed as workplace of choice"

- Dr. Jennifer Davies, Dean, AIS Leadership Centre at the Association of Independent Schools of NSW

Please indicate how regularly you conduct a review of employee engagement:



"Our school is effective at utilising engagement survey results to inform strategic decision making"



[19] https://www.gartner.com/smarterwithgartner/motivate-employees-with-ongoing-forward-looking-feedback/

[20] https://hbr.org/2016/10/the-performance-management-revolution

Ability to Attract, Engage & Retain Talent

Top Tips:

- Start the recruitment process by establishing what are the behaviours, skills, and capabilities you're looking for in a candidate, so that they can help you deliver on your strategy
- Build your program of attraction and retention around the types of things these people value, such as supporting them to continue their own education (whether through tertiary work, sabbaticals, or other means).
- Reframe the way you go to market with an employee value proposition and clearly articulate what you are looking for. Outline what sets your school apart from others.
- Deliver on what's been promised. If you claim that the school has an inclusive culture, ensure you have programs that support this in a meaningful and authentic way.
- Canvas staff for input into the types of programs that would work for them within the school's culture, and be transparent about the ones that are achievable, and the reasons why others aren't.

School Governance & Changes to Legislation

Twenty years ago, a position on a school Board was a pleasant, non- taxing, voluntary role.

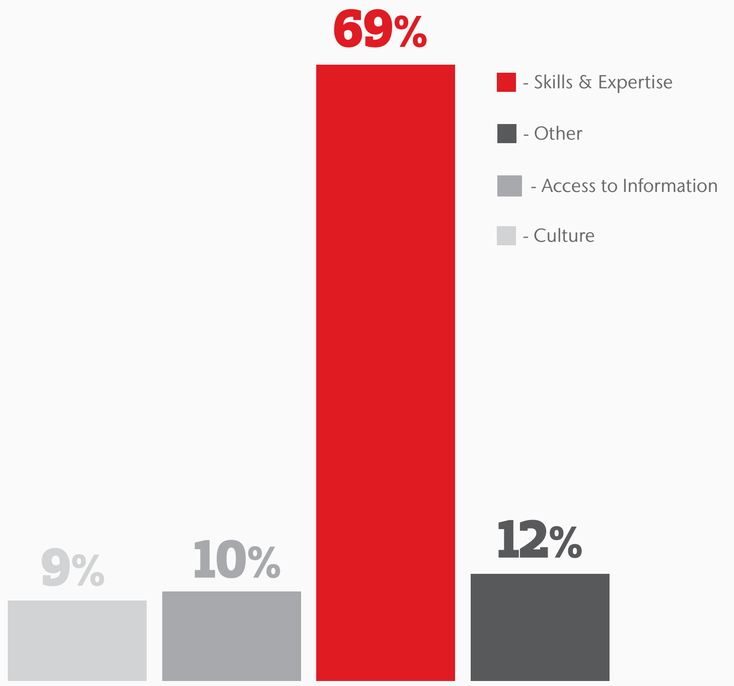
The increasingly complex nature of school management today, coupled with a tighter regulatory environment, has led to heightened expectations from the stakeholder community. This leads to the belief that the competencies of school Board Directors are on a par with those in the corporate world. Over the next twelve months, in a post-COVID-19 environment with its business continuity and financial risk implications, good governance and oversight from Boards will be vitally important.

As a risk issue, governance rated lower in this year's survey than it did in 2018. At that time, the findings and recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse had only just been released, putting a sharp focus on the role a Board plays in providing oversight of how a school exercises its duty of care to students and staff.

The slightly lower risk ranking may also reflect the continued uptake in Board member governance training and professional development. In part, this has been driven by legislation in New South Wales, which mandates that directors complete a minimum amount of professional development during their tenure, to remain eligible to be on an independent school Board. While requirements vary across the states and territories, all Board members should be encouraged to undertake governance training, even if it's not a legislated requirement.

Given the breadth of risks that Boards now need to consider, even directors with a professional or corporate background recognise there are gaps in their understanding of, and experience in, the requirements for effective school governance.

Within your school board, what would you say is the main obstacle to effective governance?



School Governance & Changes to Legislation

In addition to their corporate responsibilities (including finance, competition reputation, regulatory compliance – and more), school Boards also need to understand sector-specific and pastoral issues, such as oversight around student and staff safety and wellbeing.

An ongoing challenge for Boards is the requirement of a different sets of skills – which underscores the need for Board membership to reflect a diverse range of backgrounds, interests, and experiences.

An overwhelming majority of survey respondents (almost 70%), identified the difficulty in finding directors with the right skills and experience, as the main obstacle to effective governance.

School leadership teams need to be aware of the capabilities of people within their own communities – such as those with corporate risk management expertise – while Boards should look annually at their combined skill sets to see whether any gaps have emerged, and what type of people they need to recruit.

This further highlights the need for schools to support and promote professional development and education, not only to ensure that Board members are skilled-up and able to meet their governance requirements, but also to make Board membership a slightly less daunting consideration for potential new Board members that don't have a governance background.

"To understand the effectiveness of your board, you should benchmark it against other Boards in your sector, and across corporate governance results as well as sector-specific results. Engaged board members are motivated by seeing their own data and having it benchmarked to others (who are anonymised)."

- Fiona Mercer, CEO & FOUNDER, Governance Evaluator

Education Sector Governance Evaluator

Governance Evaluator, in partnership with Aon, has developed a comprehensive, data-driven, platform for building governance capability for independent school directors.

The education-specific content addresses the key governance themes of Curriculum, Staff and Student Safety and Wellbeing, and Talent Development to enable governing bodies to assess their current performance and potential for improvement.

The programs are completed online and can be tailored to match an individual director's skill gaps and areas of need.

For further information, visit: governanceevaluator.com

School Governance & Changes to Legislation

Not-for-profit funding obligations

Independent schools must be registered as not-for-profit entities to be eligible for Australian Government (as well as state and territory government) funding. In addition, to ensuring they maintain their funding, they must also comply with various legislative and regulatory requirements.

In New South Wales, for example, independent schools and their Boards must meet the obligations outlined in Section 83C of the *Education Act 1990* (NSW) (Education Act), which sets out clear directions on a range of activities that, if not adhered to, could jeopardise the school's not-for-profit status, and hence leave it in breach of its funding obligations.

In June 2019, the NSW Department of Education published its revised *Not-For-Profit Guidelines for Non-Government Schools*[21], which sets outs five main areas of compliance, including:

- Establishing appropriate controls and governance systems to manage financial affairs
- Providing evidence that financial transactions and decisions are transparent, at arms-length, and of reasonable market value
- Demonstrating there are no conflicts of interest between personnel and related entities, or, that those conflicts are being appropriately managed
- Producing audited annual financial statements
- Maintaining records that substantiate compliance with other regulatory and legislative requirements.

The guidelines are extensive and detailed, and require schools to not only be operating as a not-for-profit entity, but also have the governance, policies, and business records in place, to demonstrate they are making appropriate use of their tax-payer funding.

Schools that can't demonstrate compliance with the Act, risk either a loss or reduction in government funding, or having conditions placed on their operations. In a worst-case scenario, the government may terminate the entity's funding, and demand repayment of previous financial support.

[21] https://education.nsw.gov.au/content/dam/main-education/about-us/our-people-and-structure/media/documents/DOC19_563153__Not-For-Profit_Guidelines_for_Non-Government_Schools_June_2019.pdf

School Governance & Changes to Legislation

Validity of virtual board meetings

The work-from-home and social distancing requirements introduced to help contain the spread of COVID-19 has seen boards use video conferencing technologies to hold meetings. But are the decisions from these meetings valid, if the school's constitution (or governing rules) are out-dated and don't include provision for electronic meetings? For example, the constitution might require that the notice of a meeting sets out a 'place' where it will be held, which requires a physical location.

Where a school is governed by the Corporations Act, this concern has been provisionally addressed by the Federal Government through a temporary modification to the Act, which puts virtual meetings on a more secure legislative footing[23].

For other schools, unless the constitution or the rules specifically prohibit the board from meeting electronically, or state that Board meeting must be held in person, there may be a slight risk that virtual meetings might be considered a procedural irregularity.

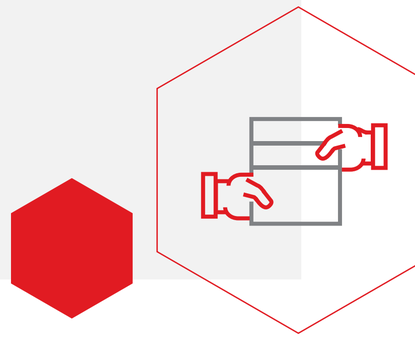
As with all other meetings, it's important to ensure electronic meeting are properly constituted – for example, there's a quorum; sufficient notice was given; and that there weren't technical issues prevented one or more of the Board members to access the video conferencing application.

In the next few months, when decisions around school finances will become increasingly important, boards should make sure that their constitution doesn't prevent them from holding meetings electronically, and that there is nothing else that would prevent those meetings being procedurally fair if they were conducted that way.

When reviewing their constitution, Boards should also be mindful of the comments arising from the Financial Services Royal Commission and Disability Royal Commission regarding the central role boards play in governance and organisational culture[24].

"School constitutions, like those of all organisations and entities, shouldn't be locked away in a cupboard and gathering dust. They should be taken out every now and then and reviewed in conjunction with legal counsel to ensure they comply with all the applicable laws and reflect current societal expectations around the roles of boards and councils."

- Amanda Ryding, Partner, Colin Biggers & Paisley



[22] http://aicd.companydirectors.com.au/resources/covid-19/virtual-member-meetings

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School Governance & Changes to Legislation

Appropriate, and reasonable market-value insurance

Section 83C[25] of the Education Act sets out clear restrictions requiring that payments for goods and services, including insurance, should be 'appropriate' and represent 'value' (which does not always mean obtaining the cheapest price).

When purchasing insurance, the intent of the guidelines is to ensure that there is reasonable cover in place, including protection from balance sheet exposures. If a school simply obtains the cheapest cover option, but as a result is underinsured, an adverse event could see the school's funding being redirected to paying for losses, rather than going toward achieving its educational initiatives and goals. Likewise, cover that is unnecessary or excessive, may not meet either the 'reasonable market value' or 'appropriateness' test.

Even where schools are in receipt of minimal government funding, limited resources need to be used wisely.

In addition to being transparent and at arms-length, these types of transactions can provide evidence of obtaining reasonable market value where the broker or third-party insurance adviser provides evidence of insurer negotiations.

"There's a common misconception that the requirement for financial transactions to represent 'reasonable market value' is about getting the cheapest price. In meeting their obligations under the Act, schools need to understand that 'value' is interlinked with 'appropriateness'. The cheapest price may not always deliver the most appropriate solution and as a result, their government funding is not being used effectively or efficiently."

- Lynette Walsh, Regional Director – Commercial, Aon

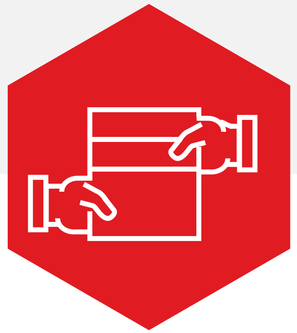
Top Tips:

Assessing governance should be a conversation between the directors, in which they assess issues such as:

- What does good governance look like, and how do we compare?
- What are our individual responsibilities as directors, and those as a board?
- Are we addressing these responsibilities, and if so, how?

A comprehensive Board evaluation can lead to:

- More effective decision making
- More efficient meetings
- Identification of areas for director capability development
- An improvement in relationships with management



[25] https://www.schoolgovernance.net.au/news/new-nsw-not-for-profit-guidelines-for-non-government-schools-new-exceptions-for-sharing-school-assets-and-providing-onsite-ancillary-services

Conclusion

For the independent schools' sector, the next 12–18 months are likely to present a multitude of challenges arising from an expected downturn in the economy.

The domino impact of a pandemic may force changes to both learning methods, and the overall face-to-face teaching environment.

Risk management, in all its various forms, needs to become an integral part of school culture, from the playground to the boardroom. Foresight and preparedness will be key to successfully leading schools through these potentially difficult times. Critical incident management and business continuity plans will need to be reviewed and revised to incorporate the lessons learned from the coronavirus lockdown and further updated as other situations arise. Just as importantly, those plans should be fully tested, and all relevant members of the school community be trained to understand their role in the execution of those plans.

The focus will be on leadership teams and board members. The decisions made and the actions taken may have far reaching impacts, including those on brand and reputation. Where schools don’t have a dedicated risk manager (or lack the knowledge of an experienced director), they should consider engaging external advisers to assist them in developing a comprehensive risk management framework. Effective risk management – including risk transfer through appropriate insurance solutions – will help build the resilience schools require for continuity into the future.

Resources

Additional Resources

A Game Plan for Concussion - Webinar

Whistleblower Laws - Webinar

Good governance starts with people - Webinar

3 steps to keep you cyber safe

Business interruption

Promoting mental health in the workplace

Decision Making in Complex & Volatile Times: Key to Managing COVID-19

View our Wellbeing For Home video series

RiskLogic Webinar on Pandemic Planning (COVID-19)

4 Ways to Manage Your Cash Flow During a Pandemic

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Contact us:

Aon Independent Schools Page

About Aon

Aon plc (NYSE:AON) is a leading global provider of risk management, insurance brokerage and reinsurance brokerage, and human resources solutions and outsourcing services. Through its more than 72,000 colleagues worldwide, Aon unites to empower results for clients in over 120 countries via innovative risk and people solutions.

For further information on our capabilities and to learn how we empower results for clients, please visit: http://aon.mediaroom.com

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