Enterprise Risk Management User Guide

Approved 2017



The Saskatchewan School Boards Association (SSBA), League of Educational Administrators, Directors and Superintendents of Saskatchewan (LEADS) and Saskatchewan Association of School Business Officials (SASBO) organizations have jointly developed the Enterprise Risk Management Framework as a common ERM system for use in all school divisions across the province. This user guide will lead the Board and it's employees through the steps required to adopt, implement and monitor an Enterprise Risk Management system within their division.

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PURPOSE

The purpose of the Enterprise Risk Management (ERM) administrative procedure is to establish ERM roles and responsibilities as well as the strategy of the school division to manage its risks. The division will identify and manage its enterprise risks in support of its vision, values, guiding principles, goals and strategic plan. The division cannot seek to eliminate risk; rather, it will support that existing and emerging risks are identified, communicated, and effectively managed.

BACKGROUND

The school division is committed to ensuring that risk management practices are embedded into key processes and operations to drive consistent, effective and accountable actions, and decision making in management practice and Board governance. The school division's ERM framework is consistent with the practices suggested by generally accepted global ERM standards frameworks, and has at this time adopted a common framework endorsed by the SSBA, LEADS and SASBO.

ERM is designed to identify potential events/risks that may significantly affect the division's ability to achieve its vision, values, guiding principles, goals, and strategic plan. Through the ERM process, identified risks are assessed based on likelihood and impact. Management processes and controls are used to provide reasonable assurance that significant risks are sufficiently mitigated to support the achievement of the division's objectives.

ERM assists to assess the division's appetite for risk (risk tolerance) and identifies gaps where identified risks are either over or under mitigated. This leads to identification of opportunities and strategies to either close gaps where residual risk is higher than risk appetite or to reallocate resources from areas where residual risk is lower than risk appetite.

The end product of ERM includes a ranked risk register used in developing the annual strategic plan and budget. ERM is an ongoing process with administrative procedure and outcomes revisited and reported at least annually.

DEFINITIONS

The following definitions will apply for the purpose of this administrative procedure:

Enterprise Risk Management (ERM): ERM is an integrated enterprise-wide process established over time which links the management of risk to strategic objectives in order to improve organization performance. It creates a formal process for managing the myriad of risks an organization faces. While ERM is not the same as a risk assessment, the assessment of risk is an integral part of an ERM process.

Risk: An internal or external event, activity or situation that impacts the ability of the division to achieve its vision, mission, outcomes and goals.

Enterprise-wide Risks: For identification purposes, risks may occur in any one of the following categories: environment, facilities, financial, governance, government relations, human resources, information technology & support areas, managerial effort / capacity, operations, reputation, strategy & vision and student outcomes. Risks rated as high using division tolerance levels will be deemed enterprise-wide risks.

Financial Risk: The ability for the division to achieve its financial objectives.

Reputational Risk: Real or perceived event that has the ability to impact the public confidence in the division.

Inherent Risk: The possibility that risks will prevent an organization from achieving its objectives before the consideration of processes and controls are in place to manage or mitigate the risks.

Impact: Significance of a particular risk to the entity. The significance of a particular risk can range from insignificant to severe/catastrophic. Magnitude of impact is determined with respect to an organization's risk appetite, risk capacity, and organizational objectives.

Likelihood (of Occurrence): Probability that a particular risk will occur. These probabilities range from rare to almost certain.

Manage: To control or take charge of a risk in order to avoid or minimize its adverse impact on the division and to maximize its opportunity.

Mitigate: To lessen or minimize the adverse impact of a risk through specific management processes or internal control activities.

Optimize: To balance potential risks versus potential opportunities within the division's stated willingness or appetite and capacity to accept risk. This may require an organization to increase or decrease the amount of risk relative to the potential opportunity.

Residual Risk: Risk remaining after considering the effectiveness of management responses optimize(i.e., processes and controls used to manage or mitigate the risks).

Risk Identification: The process of identifying and understanding potential risks to the division.

Risk Management: The process of identifying, evaluating, selecting and implementing an action plan to avoid or mitigate threats and to leverage and maximize, where possible, risk opportunity.

Risk Monitoring: The process of reviewing and evaluating the effectiveness of the action plan implemented through the risk management process and identifying opportunities to minimize future reoccurrence of similar risk.

Risk Opportunity: The return which may be realized if risk is assumed but managed in a manner that maximizes its potential benefit.

Risk Appetite: Level of risk an organization is prepared to accept to achieve its goals and objectives (i.e., the level of tolerance for risk in a company).

Risk Owner/Leader: An individual that has been given the authority to manage a particular risk and is accountable for doing so.

Management Effort: The use of resources and implementation of processes to support the division achieving its strategic objectives.

ROLES AND RESPONSIBILITIES

The following defines roles, accountabilities and responsibilities for: Identifying and evaluating key risks; Documenting and managing the response to key risks; Facilitating appropriate risk/reward decisions at all levels of management; Communicating risks, and management's responses and priorities to all relevant staff; and for Governance of risk management at the division.

Board of Trustees

The Board has ultimate responsibility for risk in the school division and therefore, the Board should provide governance oversight of the division's ERM program. This responsibility is demonstrated through review of at least the following items:

- The division's ERM framework (initially with updates as required).
- ❖ Management's risk appetite/tolerance levels, if formally developed (annually).
- Management's risk register and risk assessment results for the division's top enterprise-wide risks (annually).

The Board must determine how involved it is going to be in the various ERM activities outlined in this guide. This decision may weigh many factors including human resource capacity within the division, and then general degree of Board involvement in other division activities. The Board may be very involved in some or all of these activities.

The Board may also delegate certain oversight responsibilities of the ERM program to their own Audit and Risk Committee, or may choose to provide oversight as a "committee of the whole".

The SSBA Governance Handbook, found at http://ssbagovernancehandbook.ca/section-2/ includes the Chapter: What Board Members Need to Know about Governance and Risk which in turn includes the section entitled "Key Questions the Board Should Ask About Governance and Risk".

Audit and Risk Committee

The Audit and Risk Committee (as a subcommittee of the Board) may have certain delegated responsibilities for oversight of the ERM program from the Board. The Audit and Risk Committee is responsible for reviewing, and presenting to the Board as required, the following:

- Changes to the division's ERM framework.
- Changes to management's risk appetite/tolerance levels, if formally developed.
- Management's risk register and risk assessment results for the division's top enterprise-wide risks.
- Action plans to address risk mitigations and opportunities identified as high priority.

Director of Education

The Director is accountable to the Audit and Risk Committee and Board of Trustees with respect to ERM, and is responsible for ensuring the ERM framework approved by the Board is implemented and operational through:

- Championing risk management within the division to ensure the division remains focused on risk management.
- ❖ Integration of ERM into the strategic, business and operational planning and decision-making.
- Ensuring effective risk identification, risk assessment, risk management and risk monitoring processes within the division.
- Consulting, as required, with the division's employees or external consultants to effectively manage all aspects of risk.
- Providing ERM status updates (either directly or via a designate) at every Audit and Risk Committee, and at least once per year to the Board of Trustees, on risk management activities, as well as if any significant risk changes or issues arise.

Budget and Audit Manager (CFO)

The Budget and Audit Manager is accountable to the Director of Education and is responsible to managing the implementation and maintenance of the ERM administrative procedure and framework by:

- Developing, monitoring and revising the ERM administrative procedure.
- Coordinating the risk identification, risk assessment, risk management and risk monitoring processes.
- Preparing status updates at least once per year to the Director of Education on risk management activities, as well as if any significant risk changes or issues arise.

Executive and Administrative Councils

The Senior Administration team is accountable to the Director of Education and is responsible for:

- Active participation in the risk assessment process, including promoting the division's ERM Administrative Procedure and Framework as well as expectations for the management of risk.
- The formal identification of risks that impact the division's strategic goals and objectives.
- Assisting to rank risks, based on the division's impact and likelihood criteria.
- Monitoring progress in managing risks and implementing improvement opportunities.
- * Reporting at Executive or Administrative Council meetings on the status of risk items delegated to specific risk owners.

- Communicating the expectations of staff impacted by the identified ERM risks.
- Communicating ERM results to all staff.

DEVELOPING AN ENTERPRISE RISK MANAGEMENT FRAMEWORK

STEP 1: Board Enterprise Risk Management Policy Development

The first step is for the Board to decide to adopt an ERM Framework as a method to communicate about Risk, between the Board and the Director of Education of the school division.

Below, find a sample Board Policy establishing an ERM Framework, and some subsequent decisions that have to be made.

ERM Policy / Board Policy: Here is a Sample Board Policy that contains language to support the ERM role of the Board. This can be quite simple in nature, as it simply signals that the Board will use a strategic method to manage risk.

Once a commitment to the Strategic Plan piece – the "what" – has been made, the "Enterprise Risk Management" section delivers the "how".

Sample:

Policy 1 - ROLE OF THE BOARD

As the corporate body elected by the voters and the ratepayers that support the school division, the Board of Education is responsible for the development of strategic directions, goals and policies to guide the provision of educational services rendered within the division, in keeping with the requirements of provincial legislation and the values of the electorate.

Specific areas of responsibility are:

Strategic Plan

Provide overall direction for the school division by establishing purpose, vision, principles and belief statements, and goals.

Annually set priorities and outcomes.

Approve annual report for distribution to the public.

Annually approve budget (driven by the Strategic Plan).

Annually evaluate the effectiveness of the school division in achievement of student learning.

Monitor progress toward the achievement of outcomes.

Provide governance oversight of the Enterprise Risk Management program.

Enterprise Risk Management

Ranking of risks to the school division

Establish processes to mitigate risk to the school division

Conduct annual review of risks and the actions taken to address those risks

STEP 2: Risk Identification

Once you have established an ERM Policy and have formally adopted the ERM framework, the next step is to conduct a Risk Identification exercise focussing on your school division.

The outcome of this step is to identify any and all risks that threaten the achievement of the Board's strategic goals.

The Risk Identification stage is a dialogue that initially begins within the Board itself and/or within the Senior Administration team itself using a risk category list, such as the one on the next page.

Risks identified by the Board only or by the Administration only are likely to be skewed to one perspective or the other, so a more rounded view will be achieved through the two groups coming together at some point to identify a common list.

The size of the school division may have an impact on how this process is conducted, so it will be a task for your Board to determine the best option in your environment.

The Board may be heavily involved in risk identification in all categories, or may focus only on certain categories – like governance or finance for example – and then rely on the Administration team to identify risks in other areas that would impact their ability to achieve the strategic goals set by the Board.

This flexibility in process demonstrates how easy it is to adapt the ERM Framework to any size of school division.

For at least the initial identification process, it could be very valuable to engage a group facilitator.

When identifying risks, your school division should consider:

- Current and future expected risks.
- Risks associated with recent internal changes in the business.
- * Risks associated with external change in the business or political environment.
- ❖ The root causes for the risks (i.e., the source of the risk: why, how, and where the risks originates, either outside the organization or within its processes or activities) in order to achieve a more rigorous risk assessment and to better position the school division to manage the risks.

Using the risk categories below as a guide, the identification process can work down to highlight the unique circumstances of your school division. This list is not exhaustive.

- Environment Health and Safety
- Facilities
- Financial (ex: government funding formula and the ability for the division to achieve its financial objectives)
- Human Resources
- Information Technology & Support Areas
- Governance (ex: Board Authority)
- ❖ Government Relations
- Managerial Effort / Capacity (ex: Human Resources Teacher's ability to teach all students)
- Operations
- * Reputational (ex: protecting privacy and cyber security)
- Strategy & Vision
- Student Outcomes

After the initial identification process, best practice seems to be to continue with the identification cycle on an on-going basis (at least annually) and on an ad-hoc basis as required for significant changes or new processes, programs and initiatives.

The cycle identifies key risks on a functional or strategic basis which are then integrated to derive key enterprise-wide risks.

You will find the best risk identification practice for your Board as you work the process, but ensure that a review of the risk list is on the Board's agenda at least once per year.

An **Appendix** at the end of this user guide contains specific examples of Education sector specific risk categories to be used as a starting point in your risk identification process.

STEP 3: Risk Assessment

The Risk Assessment step identifies the significance of those risks that might affect the achievement of the school division's objectives.

Risk assessment considers both the **likelihood** that an identified risk will occur and the **impact** that risk would have, if it did occur, on the achievement of the division's objectives.

This step can be completed by the Board and/or the Senior Administration team through some form of voting system, such as weighted voting.

The key result is that the risks identified are all placed on the heat map using an agreed upon system. The "hotter" the placement of the risks, the more immediacy is attached to the risk.

Likelihood:

First, assign a "likelihood" of happening to each of the identified risks by estimating the probability of the risk occurring during the planning horizon:

Rare	Unlikely	Moderate	Likely	Almost Certain
Extremely rare: less than once every 10 years at school division	Has happened occasionally: once in 5-10 years at school division	Periodic occurrence is possible: once in 3 years at school division	Has occurred previously and could reasonably occur again: once in 1-2 years at school division	Extremely likely to occur: multiple times per year at school division

Impact:

The impact of the identified risk is assessed by estimating how the impact would be characterized if the risk occurred:

Insignificant - The consequences are dealt with by routine day-to-day operations.

Minor - The consequences would threaten the efficiency or effectiveness of some aspects of the school division, but would be dealt with internally.

Moderate - The consequences would not threaten school division, but the administration of the school division's strategy would be subject to significant review or changed ways of operating.

Major – The consequences would threaten the survival of the school division in its current form or the continued effective function of a strategic area, or would require the intervention by the Director of Education or the Board.

Catastrophic – The consequences would likely result in significant organizational or structural changes at the school division, or would likely cause major problems for the school division's stakeholders or the Ministry of Education.

The impact of identified risks is to be assessed by considering the following criteria, all of which would be rewritten to reflect your particular school division.

Impact Factors Impact Categories		Minor	Moderate	Major	Catastrophic
Financial impact of event is less than \$100,000		Financial impact of event exceeds \$100K, but is less than \$500K Financial impact of event exceeds \$500K, but is less than \$2.5M		Financial impact of event exceeds \$2.5M, but is less than \$15M	Financial impact of event exceeds \$25M
Reputational One negative article in one publication		Negative articles in more than one publication Short term negative media focus and concerns raised by stakeholders		Long term negative media focus and sustained concerns raised by stakeholders	Stakeholders lose faith in management or Trustees
Managerial Effort / Capacity Impact can be absorbed through normal activity		Some management effort is required to manage the impact	Can be managed under normal circumstances with moderate effort	With significant management effort can be endured	Potential to lead to the collapse of the organization
Government Relations Routine ministerial inquiries		In-depth ministerial inquiries	Concerns raised by Ministry of Education	School division's ability to deliver on mandate is questioned	Ministry loses faith in the organization
Legal action threatened		Civil action commenced / threatened / moderate fine assessed assessed		Criminal lawsuit commenced / significant fine assessed	Jail term of any length for a Trustee / Director multiple significant fines assessed
Student Outcomes	Immaterial Student achievement student achievement achievement show a decline		Parent's complain about student achievement	Overall student competency levels are below standards	Inability to satisfactorily deliver curriculum or key programs

Heat Mapping:

Each risk is mapped according to its likelihood of occurring and the impact of it occurring:

Heat Map					
5 Almost Certain	5	10	15	20	25
4 Likely	4	8	12	16	20
3 Moderate	3	6	9	12	15
2 Unlikely	2	2	6	8	10
1 Rare	1	2	3	4	5
Likelihood Impact	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic

For example: a "snow day" is an event that is almost certain to happen (5), but has an insignificant impact (1) on achieving the Board's strategic goals and so would be rated as a $5 \times 1 = 5$, or yellow level risk.

The value of this process is that each Board will use the map in the same way, but may assign different values to the same risk. Consider forest fire risk. One Board is "almost certain" to be impacted by a Forest Fire in the next year, and the impact it would have on student attendance could be "moderate" depending on the time of year and the duration of an evacuation event. This risk would be assessed as a 5 x 3 or "15" and is within the orange section. Your Board would want to ensure that there are some risk mitigation plans in place to manage the attendance issue arising from forest fires. For most Boards in the province, forest fire risk is not significant.

An example of a human resources risk is that the teachers in your school division may not be prepared or able to teach the diverse members of the student body and also achieve good educational outcomes for all students (FNIM, EAL, special needs). The Board may assess

the likelihood of this as "unlikely" due to the quality of your hiring practices, but if it did occur, the impact could be "major", resulting in a Risk Score of "8", or yellow level risk.

Each identified risk will be assessed using this heat map. The outcome of the risk assessment will clearly show which risks need the most attention. Your risk assessment process can be conducted in three ways:

- collaboratively between the Senior Administration team and the Board, or
- in parallel, with each group conducting separate assessments and then comparing outputs, or
- solely through the Senior Administration team to assess the risks and report the outputs to the Board.

Regardless of how your Board arrives at the ranked risk listing or risk register, there now is a list to focus on in terms of Risk Mitigation / Management.

STEP 4: Risk Mitigation / Management

One of the Board's roles in the ERM process is to set the risk tolerance for the school division. The Board should review the following guidance chart to ensure it properly captures the level of risk appetite so as to guide the Senior Administration team in developing appropriate risk responses.

After plotting risks on the Heat Map in the previous step, the Administration team can now establish an appropriate "response option" for each, in order to optimize risk management.

The Guidance chart below shows how the four risk responses correlate to the Heat Map:

Guidance on Risk Mitigation / Management				
Risk Rating	Action Required			
Extreme (16-25)	Mitigate, transfer or avoid. Immediate attention required. Action plan developed by risk owner			
High (10-15)	Mitigate or transfer. Action plan for mitigation or transfer developed by risk owner/leader.			
Moderate (5-9)	Accept or mitigate. Action plan for mitigation developed by risk owner/leader.			
Low (1-4)	Accept and monitor. No further action required.			

Accept – school division accepts, manages and monitors the level of risk and takes no action to reduce the risk (e.g. cost of mitigation is greater than the benefit).

Mitigate – school division accepts some risk by implementing control processes to manage the risk within established tolerances.

Transfer – school division transfers the risk to a third party (e.g. obtaining insurance).

Avoid – school division feels the risk is unacceptable and will specifically avoid the risk (e.g. cease the activity).

The Board's ongoing role in this section is to monitor activity, through receiving reporting, in order to support the Administration team with budgets and decision making to manage risks properly, and to advocate within the community and the Ministry for other resources to manage these identified risks.

The Administration's role is to develop risk controls, or risk mitigation plans and report on the implementation and impact of those controls.

Further, these risks should be assigned "Risk Leaders" from amongst the administration team who take responsibility for specific mitigation activities and the related reporting functions. Depending on the capacity of the division, there may be a few or many Risk Leaders.

The Risk Register or Risk Control List

This tool lists and describes all of the top enterprise-wide risks in a register. With the risk register, the school division should also identify the key risk mitigation processes or controls that are in place to address the top enterprise-wide risks. This should take the form of a succinct description of what is actually being done to manage the risk, and should only include key controls that comprise actions and processes which are demonstrably managed and clearly relate to the risk in question.

Business Planning Process Integration

The school division will ensure that the top enterprise-wide risks, and corresponding action plans, mitigating processes and controls, as documented in the risk registry are formally discussed and considered during the development of school division's strategic, business and operational plans.

STEP 5: Risk Monitoring

ERM requires periodic monitoring and updating of the school division's risk profile to identify and react to changes in key risks affecting the organization on a timely basis.

Such a monitoring process also helps ensure that risks are being analyzed to identify patterns and accumulations of risk, and help ensure that enterprise-wide responses are effectively planned and implemented where necessary.

Your school division should engage in a high-level review of the risk register once per year (approximately six months after the last annual risk assessment) to identify whether new key risks have emerged or changes in existing key risks (in terms of likelihood or impact) or in the mitigation processes have arisen since the last annual risk assessment.

In general, the ERM oversight function provided by the Board can be achieved in one of two ways, depending on the will of your Board. Both practices are common, and regardless of which method is used, it is important that all members of the Board review the reports at some time:

- ❖ A subcommittee of the board that monitors ERM activity and reports to the Board.

 The subcommittee receives reports from the Senior Administration as part of a regular and ongoing monitoring process, and in turn reports to the whole Board; or
- ❖ A "Committee of the Whole" that conducts the monitoring activity and directly receives reports from Senior Administration or Risk Leaders.

STEP 6: Risk Reporting

The Board's main function is to provide oversight for the school division, and so one of the most important aspects of ERM is in the formal or annual reporting process. Completion of the reporting cycle demonstrates that the Board has engaged the school division in the ERM process.

Internal reporting

At a minimum, upon the completion of the annual risk assessment process, as noted in the Roles and Responsibilities for ERM section above, the following is reported to the Board of Trustees:

- Prioritized risk register displaying the top organization-wide risks;
- The corresponding key risk mitigation processes or controls; and
- Any strategies that were developed to address key risks that were determined to be insufficiently mitigated.

Status Reporting:

At least once per year, the school division will engage in high-level reviews of the risk register. The following is reported to the Board:

- That the review has been undertaken;
- Any new risks that have been identified, including ranking the new risk based on the likelihood and impact heat map; and
- Significant changes in existing key risks or mitigations processes.

External Reporting

Any discussions of risk that occur within externally facing reports, such as the **Annual Report** or **Strategic Plan**, should be consistent with the annual risk assessment results. That is, the identification of risks for external disclosure purposes should not be a completely separate process from the regular risk management process with different key risks being identified in external reporting.

APPENDIX A – RISK EXAMPLES

	Category	Short Title	Risk Description
1	Financial	Government funding formula	There is a risk that the government's education funding formula does not provide a predictable, stable funding level, and may not appropriately reflect the school division's needs based upon its diverse makeup of students compared to other school divisions.
2	Human Resources	Teachers ability to teach all students	There is a risk that teachers may not be prepared or able to teach the diverse members of the student body and also achieve good educational outcomes for all students (FNIM, EAL, special needs).
3	Operations	Supporting FNIM students	There is a risk the school division may not have sufficient tools and resources to support FNIM (First Nations, Inuit and Metis) students to achieve desired educational outcomes.
4	Operations	Delivery of Quality Education	The current growth and change in makeup of student population (diversity; EAL; French immersion; special needs) results in a variety of risks to the delivery of quality education to all students (facility capacity, busing, class size, front-line staff equipped to teach diverse students, parent and society expectations, etc.).
5	Governance	Board authority	There is a risk that the Board remains responsible for operations and educational outcomes, but has lost significant information and autonomy to act given that much decision making authority has transferred to the provincial and municipal governments (e.g., funding model; setting mill rates; Ministry strategic plan; setting school calendar and total hours of instruction).
6	Reputation	Ethical breaches by teachers	There is a risk that ethical breeches by teacher or other front-line staff will result in reputation damage, possible legal or financial penalties, or parents switching students to other school divisions.
7	Facilities	Facility maintenance capacity	There is a risk the school division may not have the operational resources (funding or staff) to adequately maintain all of its schools in the future, resulting in further facility degradation, a sub-optimal teaching environment, and higher capital costs over the long-term for major repairs and replacements.

8	Operations	Child safety risk	There is a risk that incidents regarding the safety of children, including violence and threats, within care takes significant resources to prevent and manage, and could result in reputational damage, financial costs or legal action. (For example, prekindergarten transportation)
9	Facilities	Quality of facilities	There is a risk that space constraints in, and overall facility quality of, schools may result in a lower quality of education delivered to students (i.e., many schools over-capacity; teaching is occurring in spaces not intended for classrooms).
10	Human Resources	Front line succession planning	There is a risk the school division will not be able to hire a sufficient number of high-quality administrators (i.e., Principals and Vice-principals), teachers, education assistants and other front-line staff as long-tenured staff retire.
11	Operations	Performance management - student outcomes	There is a risk the school division may not have effective and robust processes or tools to measure student outcomes (from students, parents and staff) in order to keep improving good practices and cease ineffective practices.
12	Reputation	Privacy and cyber security	There is a risk the school division may be the subject of a cyber security breech or internal leak resulting in the loss of private or confidential information, resulting in reputational damage, loss of credibility and possible legal action.
13	Operations	Demonstrating educational performance	There is a risk the school division may not appropriately understand the outcomes required to achieve the curriculum and demonstrate that it is truly being taught in order to achieve its educational goals and pass ministry assessments.
14	Support Areas (including IT & Admin)	Continuity planning	There is a risk the school division may not be able to provide appropriate educational continuity or emergency response to manage plausible events (hazards; catastrophes; pandemics) while managing the cost of continuity planning.
15	Facilities	School closures for safety reasons	There is a risk that if the school division had to close all or a significant portion of one of more schools for safety or structural reasons, there would be significant challenges getting students to, and accommodating them at, other facilities.