

'They will soar on wings like eagles ...'
Isaiah 40:31

collaborate | enrich | trust | innovate | aspire | nurture

Multi-Academy Trust Policy

Common Trust Policy, Use as Published

Risk Management Policy

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Version	Date	Author	Change Description
V1.1	November 2025	T.Howard	Added Purpose to (1. Introduction) Added Pointers for Rationalising Scores to (5. Addressing risks)

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1. Introduction and Purpose

Aquila, The Diocese of Canterbury Academies Trust (the Trust) is committed to providing a safe and secure environment for all its staff, pupils, volunteers and visitors and ensuring all of our schools can remain an ongoing concern.

Risk is an inherent aspect of all academic, administrative and commercial business activities so it is appropriate to ensure sound risk management principles become part of routine management activity.

The key objective of this policy is to ensure that the Trust has a consistent basis for measuring, controlling, monitoring and reporting risk across the organisation at all levels and so that risk awareness and action forms an integral part of our internal control and corporate governance arrangements.

The purpose is to bring consistency across schools when assessing risk by using the 4x4 matrix objectively and not emotionally and aim for scores that are evidence based, proportionate and comparable.

This policy has been written with our values of aspire and trust at its heart.

2. Objectives

- To identify and evaluate risks that could prevent the Trust from achieving the overarching strategic objectives or hinder the achievement of these
- To assess the likelihood of such risks occurring and the potential impact.
- To make decisions on how much risk to accept, the measures applied to avoid or mitigate the likelihood of risk

3. Roles and Responsibilities:

The Role of the Board of Trustees

The Board of Trustees (the Board) has responsibility for the total risk exposure of the Trust and will be responsible for:

- Approving major decisions affecting the Trust's risk profile or exposure
- Deciding on the Trust's appetite for risk
- Determining what types of risk are acceptable monitor and review mitigated risks
- Annually reviewing the Trust's approach to risk management and by review and approval of the Risk Management Policy

The Role of the Trust Audit and Risk Committee (ARC)

The ARC will support the Board, ensuring a framework is established and maintained for the identification and management of risk.

The Committee is responsible for:

- Overseeing the Trust's consolidated risk register
- Reviewing all risks identified as high priority ("red" risks)
- Ensuring lower priority risks are being managed and mitigated appropriately
- Ensuring risk associated with new projects are considered

The Role of the Local Governing Body (LGB)

The Chair of Governors will have oversight of the risk register for their school. It is their responsibility to ensure the register is managed and reviewed regularly and is an accurate reflection of the school's position. The LGB's will ensure appropriate mitigation is in place. The Risk Register must be considered at each full meeting of the LGB. The LGB is responsible for:

- Considering the risks that apply to their school
- Ensuring measures are in place to reduce risks
- Ensuring a regular review of practice and risk management is in place
- Assessing any risks that could impact or impede the strategic objectives

The Role of the Headteacher

The Headteachers across the Trust, will ensure, reports viewed by governors and trustees are a true reflection of the risks. Headteachers are responsible for ensuring the Risk Register is updated as necessary, ensuring appropriate assessment of risk over the academic year. They are responsible for:

- Supporting and implementing approved policies
- Developing risk responses, including contingency and business continuity programmes
- Providing adequate information in a timely manner to the Trust and the LGB on the status of risks
- Focusing and coordinating risk management actions and mitigation ensuring their effectiveness
- Raising the level of management awareness and accountability of risks
- Developing risk management culture
- Providing a mechanism for risk management to be discussed

4. Assessment, Likelihood and Impact of Risk

Each risk is scored on a 1–4 scale for likelihood and impact, resulting in a severity score between 1 and 16.

When scores are multiplied together the total score provides the quantifiable risk. The risk profile will then determine the severity of the risk through a RAG framework (Red, Amber, Green).

Active Risks				
Likelihood/Impact	Minor	Moderate	Major	Critical
Almost Certain	3		5	3
Likely	33	11	61	15
Unlikely	31	56	82	20
Almost Never	172	215	243	63

Likelihood

- Almost Certain – Will happen in most circumstances
- Likely – Could happen at some point / occurs occasionally
- Unlikely – Rare, but possible
- Almost Never – Very rare / exceptional circumstances

Impact

- Minor – Easily managed, minimal disruption, no long-term effect
- Moderate – Noticeable impact, requires management, some short-term loss/disruption
- Major – Significant impact on operations, health/safety, finances or reputation
- Critical – Severe impact, potential regulatory/legal failure, lasting harm

1. Addressing Risks

When assessing the response to the risks, the LGBs and Board will challenge responses to ensure that the risk is well-managed and that potential threats don't materialise.

The risk register allows for one of five responses to the risk as outlined below:

- Tolerating risk is where no action is taken. This may be because the cost of instituting controls is not cost-effective or the risk or impact is low therefore considered acceptable. For instance, tolerate the risk of procuring a supplier with a poor credit rating, provided the goods/services could be obtained relatively easily from someone else.

- Treating risk involves controlling it with measures to minimise the likelihood of occurrence or impact. There may also be contingency measures to reduce the impact if it does occur. For instance, train more than the statutory minimum of staff as paediatric first aiders and to put in place a rota for first aid cover during lunchtimes.
- Transferring risk may involve the use of insurance or payment to third parties willing to take on the risk themselves.. For instance, decide to take out insurance to mitigate the risk of the excessive costs of supply staff in the event of extended staff absences.
- Terminating risk can be done by altering an inherently risky process to remove the risk. If this can be done without affecting operations, then removal should be considered, rather than attempting to treat, tolerate or transfer. Alternatively, if a risk is ranked highly and the other potential control measures are too expensive or otherwise impractical, the rational decision may well be that this is a process that should not be performed at all. For instance, decide not to contract with a related party to eliminate the reputational risk
- Monitor the risk to assess whether existing treatments or mitigating actions are having an impact and allow for alternative responses to be used at a later date.

Pointers for Rationalising Scores

When assessing or comparing scores, ask yourself:

- Evidence – What data, incidents, audits, or near-misses support this score?
- Controls – Are mitigations already in place? Should the score be lower as a result?
- Context – Does your school’s environment/building/staffing genuinely change the risk level?
- Over-cautious? – Is this “worst-case thinking” without a realistic likelihood?
- Under-cautious? – Are we dismissing the risk just because it hasn’t happened yet?
- Comparability – If another school scored differently, why? Is one approach more grounded?
- Action vs. Acceptance – Does this score help prioritise real action, or is it noise?

2. Monitoring & Review:

To ensure the LGB’s and Board are provided with up to date information, Headteachers will be responsible for monitoring risks. As a minimum, the risk register will be reviewed and updated in advance of the ARC meetings to provide an accurate reflection of the current risks, this will be at the end of term 1, 3 & 5. While this is the minimum requirement, it is recommended that risks are reviewed frequently where they link to strategic priorities and risks pertinent to the school over the academic year.

The LGB will review the risk register at each full meeting and can delegate oversight of specific core risks in line with its committee structure. Where no committee structure exists, governor monitoring should be linked with risk areas and particularly those where there is a high likelihood the risk could materialise.

ARC will identify and evaluate the significant risks faced by the Trust by:

- Providing adequate information in a timely manner to the Board on the status of risks and controls
- Guiding the focus and reviewing all reports from internal audits and monitoring the implementation of any recommendations
- Receiving an annual review of the effectiveness of the system of internal control and risk management from internal audit
- Receiving an annual report from the external auditor on the effectiveness of the internal controls reviewed as part of the audit.
- Annually reviewing the Trust’s approach to risk management and by review and approval of the Risk Management Policy

In addition to the risk register, the trust will undertake regular external audits, internal scrutiny and compliance visits. These will provide an indication of risks across the trust offer the Board a wider verification of the analysis of the risks.

The Trust will review this policy every year and assess its implementation and effectiveness.