



Twyford
C of E
Academies Trust

Document Title	Risk Management Policy & Procedure
Committee Responsible for Policy	Board of Directors (in consultation with the Audit and Risk Committee)
Review Frequency	Every 3 years
Last Reviewed	March 2026
Next Review Due	March 2029
Policy Owner	Richard Lane (Director of Finance & Operations)

Assessment of the Impact of a Policy on Equality & Diversity

Policy: Risk Management Policy			
Impact assessed by: R Lane		Date: 12/3/2023	
1. What is the potential for this policy impacting a person or group with a protected characteristic differently (favourably or unfavourably) from everyone else? Low risk. The only potential impact is that the Trust may under-assess the risk of failing to address inequality issues.			
2. How would this be evidenced? Discrepancy between the evaluation of the risk of failing to address inequality issues in the risk register and other evidence such as complaints or other evidence of equality issues not being addressed.			
3. What is the impact of the policy and latest changes on people with protected characteristics?			
Protected Characteristic	Impact before change*	Impact after change*	Comments
Age	Neutral	Neutral	
Disability	Neutral	Neutral	
Gender Reassignment	Neutral	Neutral	
Marriage and civil partnership	Neutral	Neutral	
Pregnancy and maternity	Neutral	Neutral	
Race	Neutral	Neutral	
Religion or belief	Neutral	Neutral	
Sex	Neutral	Neutral	
Sexual orientation	Neutral	Neutral	

* Positive/Negative/Neutral.

4. Policies are required to reduce or eliminate inequality and disadvantage and promote diversity. Does this assessment indicate that the Policy and latest changes pass or fail this test? Pass
--

Log of Changes

July 2025: Add risk capacity and tolerance.

March 2026: Reference to DfE guidance added.

Risk Management Policy and Procedure

The Board of Directors is committed to maintaining the long-term health of the Trust. The Trust will seek to minimise risks through a suitable system of controls which manage the level of risk such that the residual risk after any mitigating actions can be borne without serious permanent damage to the Trust. In formulating this policy Directors have been guided by [Academy Trust Risk Management Guidance](#) produced by the Department for Education.

1 Statement of Principles

1.1 Risk Appetite/Tolerance

- The Trust will not undertake an activity with an uncertain outcome where the sole intended purpose is to make a financial gain.
- The Trust recognises that any advances in the provision of education will not be possible unless the Trust takes risk. Directors, officers and staff have a responsibility to strike the right balance between too passive an approach (taking little or no risk and thereby failing to make improvements) and too active an approach (taking too much risk and thereby imperilling the Trust).
- The Trust's capacity to accept risk is limited by its financial resources and ability to recover from reputational damage. Taking risk appetite and capacity for taking risks together indicates the Trust's ability to tolerate risk. The Trust's tolerance for risk will be re-assessed each time this policy is reviewed.

1.2 Risk Management

- The Trust will maintain an effective control framework designed to contain risks where cost-effective to do so and to manage risks effectively.
- This risk framework forms an important element in the Trust's internal control system. The operation of the risk management framework is reviewed annually by the Audit Committee of the Board of Directors. The Trust's risk register is reviewed by the Resources Committee and the Audit and Risk Committee at each of their meetings.
- The Trust will develop an internal culture where all managers "think risk" in all that they do and break down each activity into its risk elements and the possible financial impact of each element.
- Major external threats to the Trust will be identified and monitored and contingency plans made to respond effectively in the event of such threats materialising.
- Residual risks will be defined for all proposed activities and where that residual risk is unacceptable, and there is no means of reducing the risk to an acceptable level, the project will be rejected.
- The authority to take decisions involving risk will be appropriate to the level of risk and will be clearly defined and communicated. In general all significant risk needs to be approved by the Board of Directors or the appropriate Committee unless specific delegation has been made to managers.

- Where it is cost-effective to do so, the impact of risks materialising will be minimised by appropriate insurance cover or other indemnity.
- In addition to this policy and procedure which mainly deals with the management of high-level risks impacting achievement of corporate objectives, reference should be made to the Health & Safety Policy which particularly deals with the assessment and management of operational/health & safety risks.

1.3 Roles

- The Board of Directors (mostly through the Audit and Risk Committee) has overall responsibility for ensuring there is a risk management policy and a common approach to the management of risk throughout the Trust through the development, implementation and embedding within the organisation of a formal, structured risk management process. The Audit and Risk Committee review the risk register at every meeting, reviews the Risk Management Policy annually and reports to the full Board of Directors annually on the operation of the internal control system, including risk management. The annual report to the full Board of Directors includes the latest risk register and a review of risk management arrangements. The Resources Committee also reviews the Risk Register at every meeting. Major decisions exposing the Trust to significant risk are reserved for the Board of Directors.
- Trust Senior Managers are responsible for overseeing the day-to-day operation of the Risk Management Policy and Procedure taking day-to-day decisions which expose the Trust to moderate degrees of risk. Trust Senior Managers are also responsible for reporting annually to the Audit and Risk Committee on the risk management environment.
- The Director of Finance & Operations is the designated risk champion and is responsible for coordinating the review and update of the risk register and ensuring that the risk register reflects new project risk assessments.
- Middle/Senior Managers are responsible for owning those risks on the risk register over which they have some control. This role involves monitoring the risk environment, taking steps to mitigate risks and reporting on changes in the environment and mitigation measures in place each term. The Trust Executive also acts as a Risk Management Group which reviews the risk register during the termly update.
- All staff are responsible for reporting risks faced by the Trust to their line manager as they become aware of them.
- The Responsible Officer/Auditor is responsible for reviewing the operation of risk management arrangements regularly and reporting findings to the Audit and Risk Committee.

2 Risk Procedure

2.1 Corporate Risk Management - The Risk Register

The Trust's risk system will have the following characteristics:

- A risk register spreadsheet will be used to identify, prioritise and manage the risks we face.
- The Director of Finance & Operations is responsible for overseeing the maintenance of this spreadsheet and progress with actions by managers.
- Managers are responsible for reviewing/identifying new risks and reviewing the risk register for all risks assigned to them each term.
- In November of each year Trust Senior Managers report to the Board on the internal control and risk management environment. This review will take in, among other things, the risk register. During this exercise, the Trust Senior Managers evaluate the probability and amount of a loss and the effectiveness of controls in place managing the risk to arrive at an overall rating.

2.2 'Embedding' Risk Management in the Organisation

Risk Management should be 'embedded' in the normal management processes of the Trust. The following measures are intended to achieve this:

- During the induction process new staff will be made aware of the risks involved in their job. The Human Resources Manager will cover risks of a general nature (such as general health and safety issues). The employee's line manager will cover risks specific to the post, with reference to the latest risk register.
- Managers will have a standard agenda item at each one-to-one meeting with staff and team meetings dealing with risk – inviting staff to identify new risks and problems with controls in place to manage risks.
- The annual development planning process will include an assessment by each manager of the risks which could impede the implementation of their plan and mitigating actions they are taking.
- Managers will appraise staff each year on how they have mitigated risk.
- Managers themselves will be appraised on how they have mitigated the risks for which they are responsible.
- From time to time measures will also be taken to raise the profile of risk management with staff.
- Activities which involve unusual levels of risk will routinely be risk assessed in accordance with procedures set out in Trust policies covering Health & Safety, School Trips and First Aid and Supporting Pupils with Medical Conditions.

2.3 New Project Risks

- For all significant new projects (those where potential exposure exceeds £0.3m) a [risk assessment form](#) will be completed and considered along with the proposal (by the Board of Directors or management team as appropriate to the decision). The Director of Finance & Operations will regularly check that forms are completed for projects where they are required. Where it is decided to proceed with a project but there are significant risks the details will be added to the risk register and reviewed termly in line with the process described above.

Appendix A

New Project Risk Assessment Form

A. Description of risk	B. Potential Loss £000s	C. Probability of Risk Materialising in any one year 100%=will definitely occur	D. Expected annual loss £000s (B x C)	E. Impact without measures (High/ Medium/ Low)	F. Measures to reduce, control or manage the risk and means of ensuring that these measures are operating effectively	G. Impact with measures in place (High/ Medium/ Low)