BOHUNT
EDUCATION TRUST

RISK MANAGEMENT POLICY

Approved by: Finance, Audit & Risk Committee		Date: 2nd December 2025
Next review date:	Autumn Term 2027	

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1. Purpose of Policy

Bohunt Education Trust (the Trust) has introduced this Policy to provide the operational framework within which its ethos of Enjoy Respect Achieve is reflected in its management of risks, and identification of responsibilities in the management of those risks and to ensure its legal duties and charitable purposes are met effectively.

The Policy provides a risk management framework which:

- Protects Trust students, staff and assets
- Anticipates and manages changing social, environmental and legislative requirements
- Identifies, measures, manages, monitors and reports threats to the Trust's business objectives
- Mitigates risk and where possible reduces the costs arising from risk events
- Embeds risk management processes in both day-to-day operations and governance

2. Legislation and Guidance

This Policy complies with and discharges the Trust's legal duties with respect to:.

- Academy Trust Handbook
  https://www.gov.uk/government/publications/academy-trust-handbook
- DfE Guidance on Academy Risk Management (Sept 2019)
  https://www.gov.uk/government/collections/academy-trust-financial-management-good-practice-guides
- Governance Handbook

This policy also complies with our funding agreement and articles of association.

3. Equalities Assessment Impact Statement

The Trust is committed to treating all people equally and with respect irrespective of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. We are committed to eliminating discrimination and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face and our duties under the Equality Act 2010. We have reviewed the effect of this policy on those who may face additional or different barriers to securing its benefits than the population as a whole and have not identified any particular groups that may be more significantly impacted detrimentally by the implementation of this Policy than the general population. There are no mitigations to be taken to rectify this.

We do however consider that use of this Policy does ensure that we keep awareness at all times of the Trust's duties in law to any particular group that can more generally often face barriers to equal treatment.

4. Roles and Responsibilities

4.1. All Staff

All staff are responsible for the implementation of this policy in accordance with Section 1 of the Risk management Guidelines in Appendix 1.

4.2. Trust Board and its Committees

4.2.1. Board of Trustees

Key to the principles underpinning the Trust's approach to risk management is that the Board of Trustees has responsibility for overseeing risk management, including contingency and continuity planning within the Trust as a whole and for maintaining a sound system of internal control that supports the achievement of the Trust's policies, aims and objectives whilst safeguarding public funds and other funds and assets for which it is responsible.

The Board of Trustees fulfils its role by establishing a system of internal control that includes:

- Approving and reviewing a series of policies that underpin the internal control process including the Scheme of Delegation, LGB and Trust Board sub committee terms of reference, the risk register, and related policies including Finance Policy and its Health and Safety Policy and Premises Documents
- Agreeing objectives, plans and resources by means of the budget and Trust Development Plan (including as further detailed for each School in each School Improvement plan)
- Approving this policy, the Trust risk register and reviewing them carefully to identify risks
- Considering carefully the advice from the BET Executive, and the internal and external auditors together with advice from other external consultants or inspectors
- Appoint an audit and risk committee in accordance with the Academy Trust Handbook

4.2.2. ~~Finance~~ Audit and Risk Committee

The Board of Trustees has delegated so far as it is able its responsibility under section 5.2.1 above of this Policy to its Audit and Risk Committee . The Committee fulfils its role by monitoring the implementation of the system of internal control set out in section 5.2.1 and scrutinising all reporting under section 5.2.1 before making recommendations to the Board around any action or proposed course of action or no action. In particular, the Committee directs the Trust's internal scrutiny programme ensuring that risks are being addressed appropriately through internal scrutiny. The committee liaises closely with the internal and external auditors and reviews the whole Trust Risk register regularly. The committee ensures that significant risks and the adequacy of the Trust's internal control framework, including financial and non-financial controls are reported to the Board and otherwise by exception to the Board.

The Trust's Audit and Risk Committee will further consider the following matters:

- the Trust's ability to respond to changes in internal and external environment since the last review;
- the scope and quality of the Trust's Executive's ongoing process of monitoring the systems of internal control
- the effectiveness of the overall approach and policy to risk management and whether changes or improvements to processes and procedures are necessary

- the extent and frequency of reports on internal control to the Board's Finance, Audit and Risk Committee and whether this is sufficient for the Board to build up a cumulative assessment of the state of control and effectiveness of risk management·

4.2.3. Education Committee

The Education Committee keeps under close review the current Trust risk register in considering and scrutinising reporting and proposed courses of action relevant to its terms of reference and takes due account of any change in risk profile arising from any matter under its terms of reference.

4.3. CEO

The CEO is responsible for ensuring that the BET Executive reviews the Trust Risk Register at least twice a year, identifying and closely monitoring key risk indicators and updating the Risk Register accordingly, taking account of the movement of risk profiles, scores and mitigation as advised by each School LGB to the CEO. The CEO also is responsible for ensuring all Heads deliver 5.4 below.

4.4. Heads of Schools

All heads of Schools are responsible for ensuring that they and their senior leaders carry out day-to-day risk management, assess operational risks and identity and report risks to the school governing body through the school risk register. The review of the School risk register takes place at least twice a year, identifying and closely monitoring key risk indicators and updating the Risk Register accordingly, taking account of the movement of risk profiles, scores and mitigation. All such updates must be notified to the BET Executive in accordance with the arrangements in place as notified by CEO from time to time

4.5. Local Governing Bodies

Each School Risk Register is reviewed annually by the School Local Governing Body and the governing body works with the Leadership team to identify risks and ensure plans are in place to minimise any impact on the academy Trust and its pupils. Furthermore significant risks are reported annually and otherwise by exception to the BET Director of Governance and CEO.

5. Impact of Risk Management Approach

The Trust's approach to risk management:

- Identifies and evaluates risks which could prevent the Trust as a whole or any one School from achieving the Trust's strategic aims and objectives for the whole Trust or with respect to any one School , including the delivery of targets and KPIs set by the Board of Trustees, or makes the achievement of any of these substantially more difficult.
- Assesses the likelihood of such risks occurring (very low, low, high, very high) and the potential impact of such occurrences with particular reference to the areas of finance, reputation and planning/operations.
- Prioritises risks by use of the above scoring and ratings, determining the level of priority for risk mitigation, ensuring the Trust will prioritise risks that are very low likelihood and very high impact over risks with very high likelihood and very low impact, as the former could be catastrophic for the trust.

- Enables informed decisions to be taken on how much risk to accept, the actions/controls applied to avoid or mitigate the likelihood of such circumstances arising, to retain or transfer risk or insure against the consequences and assign responsibility for implementation.

6. Key Principles in Risk Management Approach

The following key principles apply in the Trust's risk management approach:

- An open and receptive approach to solving risk problems is adopted by the Trust
- When reviewing the School or Trust Risk Register LGBs and the Trust Board's Finance, Audit and Risk Committee will consider the following matters:
  - Whether the risk categories, items and mitigation continue to reflect risks to the achievement of the School's or Trust's strategic objectives, as defined initially by reference to the School Development Plan/Trust Development Plan
  - Whether the categories of risks as set out in the risk register continue to reflect the risks that the School or Trust are now exposed to
  - Changes in the nature and extent of significant risks
  - The Trust's risk appetite or level of exposure for the Trust as a whole as set out in the Risk Appetite Statement in Section D below
  - Any matters relating to internal control reported by the internal auditors which the LGB or Trust Board's Finance Audit and Risk Committee is monitoring
  - Incidents of any fundamental control failings/risk events or weaknesses identified during the year and the impact that they have had or could have had on financial results
  - The effectiveness of the Trust's and School's reporting processes
- The Trust makes conservative and prudent recognition and disclosure of the financial and non-financial implications of risks.
- The Trust uses a weighted scoring for all identified risks, early warning indicators, milestones on actions and details sources of assurance over the controls in place, relevant to each identified risk.
- All colleagues within the Trust are encouraged to be involved in the risk management process by the reporting of risks through to the senior leadership teams. The Risk Management Guidelines ensures that ownership of risk is fully embedded across the Trust.
- The Trust has a Public Interest Disclosure Policy in place and has procedures for whistleblowing, to protect those who report individuals they believe are doing something wrong or illegal. Staff, visitors, volunteers and contractors should know what protection is available to them if they report someone, what areas of malpractice or wrongdoing are covered in the Trust's whistleblowing procedure, and who they can approach to report a concern. The Trust ensures all concerns raised with them by whistle-blowers are responded to properly and fairly.

7. Statement of Risk Appetite

The Risk Appetite statement specifies the amount of risk the Trust is willing to seek or accept in the pursuit of its long term strategy. It indicates the parameters within which the Trust would want to conduct its activities.

7.1. Prioritisation of Risks

The need to avoid risks relating to Safeguarding, Quality of education, compliance, financial prudence and maintenance of reputation will take priority over other factors. For example, it will not be acceptable to undertake risks in certain areas such as quality of teaching and learning. For the avoidance of doubt, the Trust is open to innovation in education and student experience, if this supports and enhances the curriculum and outcomes and does not expose it to undue finance or compliance risks.

7.2. Balancing Risks

A balanced assessment has to be taken of risks of any activity or not doing an activity- in many cases there are risks attached to both doing something and doing nothing.

The Statement below is a guide indicating the areas to be innovative; areas to be conservative and compliant, and the boundaries which should not be crossed, and where the Board would need to be notified.

7.3. Statement of Risk Appetite

The Trust's approach is to minimise its exposure to safeguarding, compliance, reputational and financial risk, whilst accepting and encouraging a degree of risk in pursuit of its strategy. It recognises that its appetite for risk varies according to the nature of the proposed activity, and that its acceptance of risk is subject to ensuring that potential benefits and risks are fully understood before developments are authorised, and that measures to mitigate risk are established.

7.4 Risk control

The trust board will consider the following when deciding the appropriate risk treatment option(s), balancing the potential benefits from the achievement of objectives against the costs, efforts, or disadvantages of proposed actions.

Accepting/ 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 so low that they are considered acceptable

Treating risk involves controlling it with actions to minimise the likelihood of occurrence or impact. There may also be contingency measures to reduce impact if it does occur

Transferring risk may involve the use of insurance or payment to third parties willing to take on the risk themselves (for instance, through outsourcing)

Terminating risk can be done by altering an inherently risky process to remove the risk. If this can be done without materially affecting operations, then removal will 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 the academy trust will not be performing at all

8. Training

All staff will receive training and development in the operation of this Policy as determined by their line manager and the guidelines commensurate with their role in its implementation and with regard to any specific duties allocated to post holders under this Policy. All staff receive training at induction and then subsequently with respect to the management of risk in general as well as the operation of this Policy commensurate with the nature of their role and as determined by their line manager, and taking account of specific risks that arise in the context of the performance of their specific role.

9. Monitoring provisions

Monitoring is ongoing and continuous, as this supports the trust's understanding of whether and how the risk profile is changing. Monitoring also provides assurance on the extent to which the mitigating actions and controls are operating as intended and whether risks are being managed to an acceptable level.

The risk register is central to risk monitoring. As risks are identified, they will be logged on the register and the associated control measures documented.

The risk register will be maintained by Trust staff and overseen and reviewed by the Audit and Risk Committee at least annually as required by the Academy Trust Handbook.

The Audit and Risk Committee will review this policy at least every three years. The risk register is kept under review twice each year by the same Committee or more often depending as required by circumstances.

10. Links to other policies

This Policy is underpinned by all Trust policies as all policies deliver the Trust's framework within which its ethos is delivered and thus risks arising but specifically links can be made to

- Public Interest Disclosure Policy
- Anti Bribery and Corruption and Acceptance of Gifts Policy
- Finance Policy
- Health and Safety Policy
- Data Protection Policy
- Scheme of Delegation
- Safeguarding and Child Protection Policy
- Educational Visits Policy
- Staff, LGB and Trustee Codes of Conduct (reviewed annually)

Appendix 1- Risk Management Guidelines

1. All staff are responsible for Risk Management

All BET staff recognise that effective risk management protects and adds value to their School and therefore the Trust as a whole through supporting the Trust and each School's objectives by:

- Improving decision making, business planning and prioritisation by comprehensive and structured understanding of the wider business environment
- Supporting more efficient allocation and use of resources within the School or Trust · Enhancing communication between schools and services
- Protecting and enhancing School and Trust estate, assets, reputation and image · Developing and supporting staff and the School's and Trust's knowledge base
- Helping to focus the internal control & scrutiny and audit plan

2. The Structure and Administration of Risk Management

2.1. The Trust Board as advised by the BET Executive and where appropriate through its Finance Audit and Risk Committee

- Sets the tone and influence the culture of risk management within the Trust through the Risk Management Policy and by keeping the Trust risk register under review;
- Though the Trustees' Annual Report, reports annually on the effectiveness of the risk management process in the Trust in ensuring that the Trust is able to achieve its strategic objectives and approves changes or improvements to key elements of its processes and procedures
- Determines the appropriate risk appetite or level of exposure for the Trust and each School in its Risk Appetite Statement as set out in the Risk Management Policy
- Approves major decisions affecting the Trust's risk profile or exposure or that of any one School
- Sets the Risk Management policy and strategy for risk management
- Monitors the management of significant risks to reduce the likelihood of unwelcome surprises or impact
- Satisfies itself that the less significant risks are being actively managed, with the appropriate controls in place and working effectively, including through the planning of internal audit

2.2. The Local Governing Bodies

- Support and influence the development of awareness of all staff that risk management is part of the School's culture in all its activities
- Support and monitor the implementation of policies approved by the Trust recognising that the management of risk is inherent in each policy (examples include Data Protection, Health and Safety, Safeguarding, Acceptable Use, Behaviour) as well as through the specific Risk Management Policy
- Support the Head of School and BET Executive in raising the level of all staff awareness and accountability for the risks that arise in each School
- Review the School risk register at least annually, advising the COO (and Governance Lead) of most significant risks, which will be monitored more regularly by the LGB
- Satisfy itself that less significant risks are being actively managed in the School with appropriate controls in place

- Monitor the implementation of KPIs and the School's strategic plan and identify any perceived new risks or failures of existing control measures
- Advise the Trust Board through the *Director of Governance* and CEO of any significant matters

2.3. The BET Executive and Director of Governance in particular as the Risk Management Champion

- Ensure the communication dispersal of vital information
- Provide guidance, interpretation and understanding of appropriate mitigation of the risk
- Review the Trust risk register at least twice a year to allow for consideration of exposure and prioritisation of work in the light
- Consider early warning indicators reported by Heads of Schools, LGBs and other internal control mechanisms that BET Executive operate

2.4. The Heads of Schools

- Have primary responsibility for managing risk on a day-to-day basis in their School · Have responsibility for promoting risk awareness within the School's activities; · Identify and evaluate the significant risks faced by their School for consideration by their LGB,
- BET Executive and where appropriate, the Trust Board and its Finance, Audit and Risk Committee
- Ensure that risk management is incorporated at the conceptual stage of activities or projects as well as throughout a project
- Ensure that review of the risk register and risk management is at least a termly management meeting item to allow consideration of exposure and to prioritise work in the light of effective risk analysis
- As part of the regular review of the risk register, review key performance indicators and progress towards objectives and report early warning indicators to BET Executive
- Report systematically and promptly to the BET Executive any perceived new risks or failures of existing control measures

2.5. All Staff

- Understand their accountability for individual risks
- Understand that risk management and risk awareness are a key part of the Trust's culture
- Understand how they can enable continuous improvement of risk management response
- Report systematically and promptly to senior management any perceived new risks or failures of existing control measures

3. Risk Identification

Risk is not only about adverse events, it is also about missed opportunities. All areas of activity within the School and Trust and partnerships with third party organisations are considered together with the barriers that would prevent the activities being as successful as they should. The key risks that each School and the Trust as a whole faces will be those that would stop School or the Trust achieving its objectives in these areas.

First, all staff with responsibility for delivering strategic aims, KPIs or targets understand the School's and Trust's strategic objectives and the legal and regulatory environment in which the Trust operates.

Secondly, BET Executive and Heads of School translate these objectives into operating aims in the form of the BET Development Plan and the School Improvement Plan supported by detailed plans applicable to each area of School activity including the teaching of each subject and performance indicators for each area. This is an ongoing annual exercise with regular updating of the progress towards the delivery of the aims.

The next step identifies the barriers to preventing each area being as successful as it should, and in the Trust are identified through the structured approach of the Risk Register.

There are many methods for grouping risks, starting from either categorising risk or analysing it using a functional approach. The Trust has chosen to categorise risk and these are set out in the Risk Register in detail.

The risks that have been identified are recorded on the School risk register and updated to the risk register for each School. Significant risks are advised by Heads of Schools (to the CEO and Director of Governance) and LGBs to Director of Governance and CEO and incorporated, as determined by the BET Executive, into the Trust risk register.

4. Risk Estimation (Assessing Likelihood and Impact); Prioritisation and Mitigation

Having identified the risks that the School/Trust is facing, these are prioritised into a manageable order so that action can be focused on the significant risks. At this stage in the risk management process the focus is about the risks that threaten the achievement of the Trust's operating aims and objectives. Risk prioritisation will enable necessary action to be taken at the relevant level of management in the School or the whole Trust.

The Risk Register sets out the way in which risks are assessed and scored, prioritised and mitigated.

5. Risk Monitoring

The likelihood or impact of an identified risk can change for a number of reasons including:

- Nature of the risk has changed or is changing
- Existing controls are inadequate or not functioning
- New controls are introduced

6. Risk Reporting

Different levels within the School/Trust need different information from the risk management process. Reporting mechanisms are implemented and operated in different activity areas for each School and the Trust as a whole and each School.

Early warning indicators including relating to the delivery of targets and performance indicators are reported systematically and promptly to senior management to allow action to be taken. The frequency of reporting is related to how quickly a risk can materialise and its likely impact.