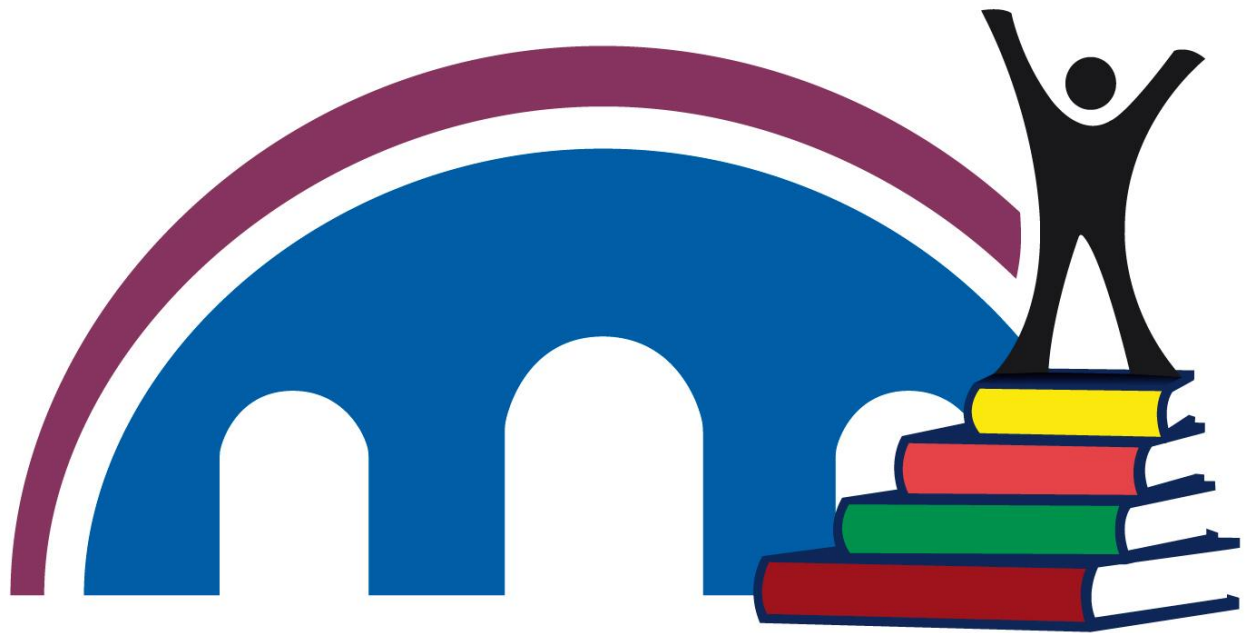




Bridge Academy Trust

RISK MANAGEMENT POLICY

September 2026

Date of Draft Policy: (this is the month/year the policy was drafted)	May 2026	
Last approved version Frequency of review	October 2023 3 years	
Consultation with Staff Required	Yes ☐	No ☒
Period of Consultation (if required)	From N/A	To N/A
Trustees Committee Reviewing Document	Trustee Policy Review Committee	
Date of Board of Trustees Meeting at which Policy Approved	16 th June 2026	
Date of Adoption of Policy	1 st September 2026	
Date Policy available on Central Area/www (If appropriate)	1 st September 2026	
Reviewer	CFOO/Estates and Compliance Director	
Advice From	Internal Processes	

Summary of Changes

Section Number	Current	Proposed Amendment
Title	Risk Management and Strategy Policy	Risk Management Policy
Introduction	Bullet pointed section	Reduced section, improved wording
1.1	ESFA	DfE
2.1 - SCOPE		New section added
3.4	Policy and Compliance Director	Compliance and Estates Director
3.5	Headteacher	Headteachers/Head of Schools
4.1 - Equality Impact Assessment		New section added
5.1	The Risk Management Standard states that risk identification should be approached in a methodical way to ensure that all significant activities have been identified and all the risks from these activities have been defined.	Risk identification should be approached in a methodical way to ensure that all significant activities have been identified and all the risks from these activities have been defined.
5.2	Our	The Trust's
5.6		Re-prioritised Matrix
5.7	The term risk appetite describes the level of risk that a Trust is willing to accept while pursuing its objectives. Simply, it is a framework for making decisions about risks. The Trusts appetite to risk is related to the longer-term strategy of what needs to be achieved and the resources available to achieve it. Risk appetite may vary depending on the category of risk being considered.	The term risk appetite describes the level of risk that a Trust is willing to accept while pursuing its objectives. The Trusts appetite to risk is related to the longer-term strategy of what needs to be achieved and the resources available to achieve it. Risk appetite may vary depending on the category of risk being considered.
5.8	The Board of Trustees has reviewed its risk appetite and will continue to do so on an annual basis. As a rule, for risks scoring above 17 in the matrix above, the Trust will actively seek to manage risks and will prioritise time and resources to reducing, avoiding, or mitigating these risks.	The Board of Trustees has reviewed its risk appetite and will continue to do so annually. As a rule, risks scoring above 15 in the matrix will be actively managed, with the Trust prioritising time and resources to reduce, avoid, or mitigate them.
Appendix 1	Technology – Eager	Technology to Open
Appendix 1	Technology is seen as an important part of developing young people to become digital citizens and is not limited to use as a tool for learning. We embrace new technological	Technology is an integral element in preparing young people to become responsible and capable digital citizens. Its

	opportunities and horizon scan to remain ahead of the game.	use extends beyond supporting learning and includes the development of wider digital skills. The Trust actively embraces emerging technologies and undertakes regular horizon scanning to ensure we remain forward thinking. Appropriate safeguards, risk assessments and mitigation measures are implemented to ensure that all technological use is safe, responsible and aligned with statutory guidance and Trust policies.
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INTRODUCTION

- 1.1 The DfE state “risk management involves the identification, measurement, management, monitoring and reporting of threats to an organisation’s business objectives.” The Risk Management policy is to be read in conjunction with the Risk Register and explains the Trusts’ underlying approach to risk management, documents the roles and responsibilities of the Board of Trustees, the Senior Leadership Team within each school and other key parties.

SCOPE

- 2.1 This policy applies to Bridge Academy Trust, including the Board of Trustees, its committees, Central Team, schools, and senior leadership teams, and sets out the framework for identifying, assessing, managing and monitoring risks that may impact the achievement of the Trust’s strategic objectives. It covers strategic, financial, operational, compliance and reputational risks and applies to Trust-wide activities as well as risks specific to individual schools. This policy should be read in conjunction with the Trust Risk Register and is intended to support effective governance, internal control, and decision-making across the Trust.

ROLES AND RESPONSIBILITIES

TRUSTEES

- 3.1 The Board of Trustees holds ultimate accountability for risk management across the Trust. The Board is responsible for:
- a) setting and approving the Trust’s risk appetite.
 - b) determining the Trust’s overall approach to risk management.
 - c) ensuring that a robust framework for risk identification, assessment, mitigation and assurance is in place.
 - d) receiving regular assurance that significant and strategic risks are being actively managed and reviewed.

The Board discharges detailed oversight through the Audit & Risk Committee.

AUDIT AND RISK COMMITTEE

- 3.2 The Audit & Risk Committee acts on behalf of the Board to oversee the effectiveness of the Trust’s risk management framework. The Committee is responsible for:
- a) maintaining strategic oversight of the Trust Risk Register.
 - b) conducting a formal annual review of the Risk Register.
 - c) scrutinising the management of key strategic and cross Trust risks.
 - d) ensuring that risks are appropriately identified, assessed, controlled and reported.
 - e) providing clear assurance and escalation reports to the Board of Trustees.

The Committee ensures that risk management informs strategic decision-making, including budget setting.

CHIEF EXECUTIVE OFFICER (CEO)

3.3 The Chief Executive Officer is responsible for:

- a) embedding a positive and proportionate risk management culture across the Trust.
- b) ensuring that senior leaders understand and fulfil their responsibilities for managing risk.
- c) ensuring that risk management is integrated into operational and strategic decision-making.
- d) supporting effective escalation of material risks to the Board and Committees where required.

COMPLIANCE AND ESTATES DIRECTOR

3.4 The Compliance and Estates Director (or nominated senior officer) is responsible for the coordination and technical oversight of the Trust's risk management arrangements, including:

- a) coordinating the Trust-wide risk management process.
- b) supporting the compilation, maintenance and quality assurance of the Risk Register.
- c) advising leaders on risk assessment methodology, control effectiveness and mitigation measures.
- d) ensuring reporting arrangements are clear, consistent and timely.
- e) acting as a key professional link between schools, the Central Team and the Audit & Risk Committee.

HEADTEACHERS/HEADS OF SCHOOL

3.5 Headteachers / Heads of School are responsible for school-level risk ownership, including:

- a) identifying and managing risks that may impact educational outcomes, safeguarding, compliance, finance, health & safety and operational delivery.
- b) ensuring that effective controls and mitigation actions are implemented locally.
- c) contributing to the Trust Risk Register through regular review and update of school-level risks.
- d) escalating material or emerging risks in line with Trust reporting arrangements.

SENIOR LEADERSHIP TEAMS

3.6 Senior Leadership Teams are responsible for:

- a) monitoring risks within their areas of responsibility.
- b) implementing and tracking agreed mitigation actions.
- c) reviewing the effectiveness of controls.

- d) contributing to interim and periodic reviews of the Risk Register.

STAFF

3.7 All staff are expected to:

- a) operate in accordance with the Trust's risk management framework;
- b) comply with relevant policies and procedures; and
- c) promptly report emerging risks, incidents or control weaknesses to line managers or senior leaders

EQUALITY IMPACT ASSESSMENT (EIA)

- 4.1 An Equality Impact Assessment has been completed for this policy which identified no significant negative impacts.

IDENTIFICATION OF RISKS

- 5.1 Risk identification should be approached in a methodical way to ensure that all significant activities have been identified and all the risks from these activities have been defined.
- 5.2 The Trust's approach to risk management is linked to our values, vision, and mission and to the five-year strategic priorities and objectives. Our Risk Management Strategy should be considered alongside the following strategic documents:
- a) Trust Improvement Strategy;
 - b) Individual School Improvement Plans;
 - c) Scheme of Delegation.
- 5.3 The structure and organisation of the Trust and school risk registers seek to ensure that all significant objectives and activities have been identified, and the risks associated with each area have been identified. By raising awareness of risk management in the Trust, we aim to empower and train all staff to identify and escalate risks in a proactive way.

EVALUATION OF RISKS

- 5.4 The Risk Management Standard states that risks should be evaluated against agreed criteria to make decisions about the significance of risks to the organisation.
- 5.5 The Trust uses a 5x5 matrix to assess impact and probability as low, low/medium, medium, medium/high, or high, as illustrated below:

5.6 The descriptors for low, low/medium, medium, medium/high, and high impact and probability are as follows:

a) Impact of risk occurring:

		PROBABILITY				
		1 Low	2 Low/Medium	3 Medium	4 Medium/High	5 High
I M P A C T	1 Low	1	2	3	4	5
	2 Low/Medium	2	4	6	8	10
	3 Medium	3	6	9	12	15
	4 Medium/High	4	8	12	16	20
	5 High	5	10	15	20	25

Grade of impact	Description
Low	Fairly insignificant, may lead to a tolerable delay in the achievement of objectives or minor reduction in quality or an increase in cost.
Low/Medium	Some impact of the risk, fairly minor .
Medium	Moderate effect . Risk factor may lead to delays or increase in cost.
Medium/High	Major effect . Risk factor may lead to significant delays or non-achievement of objectives.
High	May cause key objectives to fail. Very significant impact on organisational goals. Legal or regulatory implications. Significant reputational impact.

b) Probability of risk occurring:

Grade of probability	Description
Low	Rare, may occur in exceptional circumstances.

Low/Medium	Might occur at some point in time. Conditions do exist for this to occur, but controls exist and are effective.
Medium	Could occur, this is possible. Measures to reduce likelihood exist but may not be fully effective.
Medium/High	Will probably occur, measure may or may not exist to reduce likelihood.
High	Is expected to occur, almost certain.

RISK APPETITE

- 5.7 The term risk appetite describes the level of risk that a Trust is willing to accept while pursuing its objectives. The Trusts appetite to risk is related to the longer-term strategy of what needs to be achieved and the resources available to achieve it. Risk appetite may vary depending on the category of risk being considered.
- 5.8 The Board of Trustees has reviewed its risk appetite and will continue to do so annually. As a rule, risks scoring above 15 in the matrix will be actively managed, with the Trust prioritising time and resources to reduce, avoid, or mitigate them.
- 5.9 Current risk appetite statements are included in this strategy document under [Appendix 1](#).

ADDRESSING RISKS

- 5.10 When responding to risks, the Trust will seek to ensure that risks are managed and do not develop into an issue where the potential threat materialises.
- 5.11 The Trust will adopt one of the 4 risk responses outlined below:
- Avoid** – Counter measures are put in place that will either stop a problem or threat occurring or prevent it from having an impact.
 - Transfer** – The risk is transferred to a third party, for example through an insurance policy.
 - Reduce** – The response actions either reduce the likelihood of a risk developing or limit the impact on the Trust to acceptable levels.
 - Retain** – We accept the possibility that the event might occur, for example because the cost of the counter measures will outweigh the possible downside, or we believe there is only a remote probability of the event occurring.

THREE LINES OF ASSURANCE

- 5.12 In order to manage identified risks and to provide assurance to Trustees, we will record three lines of assurance within the risk register. These lines of assurance are managed in the following way:
- The first line of assurance is provided by the staff member who owns and manages the risk. Each risk will have a lead individual assigned.
 - The second line of assurance is the overall risk management and compliance provided by the executive.
 - The third line of assurance is an audit function which provides the board and senior management with comprehensive assurance based on the highest level of independence and objectivity (usually provided by an external source).

RISK MONITORING, REPORTING AND COMMUNICATION

- 6.1 The aim of reporting risk is to provide assurance to the Trustees, Trust leaders, Auditors, and other relevant parties that the Trust is effectively managing its risks and has a robust system of internal controls.

RISK REGISTER

- 6.2 The reporting mechanism will be the Trusts Risk Register. This will highlight the key risks facing the Trust, as well as a breakdown for each key strategic aim or category.
- 6.3 Any significant changes in risk impact or probability, or the occurrence of an event which raises the profile of a risk will be recorded on the risk register as it occurs. Any new or increased risks identified by Trust leaders, Trustees or raised by a member of staff will be evaluated and, if appropriate, recorded in the Risk Register.
- 6.4 Medium/High and High rated risks on the register will be considered by Trustees at their meetings.

COMMUNICATING RISK

- 6.5 The Audit and Risk Committee monitor the risk register each term. The CFOO/Compliance and Estates Director will ensure that any perceived new or increased risks or significant failure of risk management control measures are considered and reported to the Audit and Risk Committee, along with a summary of actions taken. The CFOO will endeavour to raise awareness that risk management is a part of the Trust's culture and seek to ensure that:
- a) Individual members of staff are aware of their accountability for individual risks.
 - b) Individuals report promptly to senior management any perceived new risks or failure of existing control measures.
- 6.6 The Audit and Risk Committee will, through their report to the Board of Trustees, provide assurance that risk is managed in line with the Trust strategy and provide an update on action taken to date. The committee will also escalate any specific risks for consideration by the board where the impact or probability are deemed to be Medium/High or High.

INTERNAL AUDIT

- 7.1 All academy trusts must have a programme of internal scrutiny to provide independent assurance to the board that its financial and non-financial controls and risk management procedures are operating effectively.
- 7.2 The Audit and Risk Committee will commission a programme of internal audit over the academic year. This internal scrutiny will focus on:
- a) Evaluating the suitability of, and level of compliance with, financial and non-financial controls. This includes assessing whether procedures are designed effectively and efficiently and checking whether agreed procedures have been followed.
 - b) Offering advice and insight to the board on how to address weaknesses in financial and non-financial controls, acting as a catalyst for improvement, but without diluting management's responsibility for day to day running of the Trust.

- c) Ensuring all categories of risk are being adequately identified, reported, and managed. The Trust will identify on a risk-basis (with reference to its risk register) the areas it will review each year, modifying its checks accordingly. For example, this may involve greater scrutiny where procedures or systems have changed.

7.3 The Audit and Risk Committee will also take account of output from other assurance procedures to inform the programme of work. For example, it should have regard to recommendations from the Trust's external auditors as described in their management letter, and from relevant reviews undertaken by DfE.

7.4 Independence in internal scrutiny will be achieved by establishing appropriate reporting lines whereby those carrying out checks report directly to the Audit and Risk Committee, which in turn provides assurance to the trustees.

ANNUAL RISK REVIEW AND ASSESSMENT

8.1 The Accounting Officer (CEO) review provides an annual assessment of the effectiveness of the Trust's management of risk.

8.2 The CFOO and the Compliance and Estates Director will prepare a termly review of risk for the Audit and Risk Committee. This will enable the Audit and Risk Committee to report to Trustees on:

- a) The significant risks facing the Trust;
- b) The effectiveness of the risk management processes and annually that;
- c) The Trust has published a risk management strategy covering risk management philosophy and responsibilities.

APPENDIX 1: TRUSTEES RISK APPETITE STATEMENTS

Agreed BAT Risk Appetite Category	Definition (from ¹ Orange Book)	Appetite (Averse, Cautious, Open, Eager)	Appetite Description
Strategy	Guiding principles or rules in place that are receptive to considered risk taking in organisational actions and the pursuit of priorities. Organisational strategy is refreshed at 2–3-year intervals.	OPEN	Our strategy encourages us to take risks. We may not have the resources required to achieve some of our strategic objectives, but we strive to come as close as possible. Our approach to creating and implementing the strategy is ambitious and fearless.
Reputation	Appetite to take decisions with potential to expose organisation to additional scrutiny, but only where appropriate steps are taken to minimise exposure.	CAUTIOUS	We are willing to accept negative impacts on our reputation to shape the education landscape and make improvements for the better in the long run, on the understanding that any impact will be short-lived.

¹ Orange Book – This guidance establishes the concept of risk management and provides a basic introduction to its concepts, development and implementation.
<https://www.gov.uk/government/publications/orange-book>

Governance	Willing to consider actions where benefits outweigh risks. Processes, and oversight / monitoring arrangements enable cautious risk taking. Controls enable fraud prevention, detection, and deterrence by maintaining appropriate controls and sanctions.	CAUTIOUS	Strong governance practices underpin all that we do. We are willing to undertake cautious risk taking to improve our practice but only when risks are identified and mitigated against. Our approach to governance forms the stable backbone for the organisation.
Education - Standards	Not included in Orange Book.	CAUTIOUS	We balance being creative with the way we respond to regulatory outcomes. We ensure that any change to the way we regulate is tested before embedding it.
Education – Innovation and Change	Not included in Orange Book.	EAGER	We will deliver best education that is recognised for its impact and inspires others. We innovate based on what we have learned. Research and data are key components of our approach. Any innovations are risk assessed, and necessary mitigations put in place.
Safeguarding	Not included in Orange Book.	AVERSE	Safeguarding is an essential part of everything that we do. We are not willing to accept risks that cannot be entirely mitigated against.
Compliance	Not included in Orange Book.	AVERSE	Compliance to legal and statutory obligations are essential and we ensure that robust systems and processes are in place to enable this. We also invest in external scrutiny and a centrally resourced team to provide appropriate assurance to Trustees. We are not willing to accept risks that cannot be entirely mitigated against.

Legal	Play safe and avoid anything which could be challenged, even unsuccessfully.	CAUTIOUS	We are only willing to accept risks which are low impact or have a very low likelihood of occurring, and with mitigating actions having been taken.
Finance	Seek safe delivery options with little residual financial loss only if it could yield upside opportunities.	CAUTIOUS	Value for money remains the primary concern, but we are willing to consider other benefits or constraints. Resources are generally restricted to existing commitments.
People	Innovation pursued – desire to ‘break the mould’ and challenge current working practices. High levels of devolved authority – management by trust rather than close control.	EAGER	Our culture is focused on learning, enabling, and encouraging improvement and innovation, responsibility, and accountability. Ongoing development, nurturing and participation are key components. Collaboration is a core part of how we identify, agree, and make improvements to the way we work and shape who we are. We actively evolve the way we work to ensure that wellbeing, equality, diversity, and inclusion are at the heart of what we do.
Information Management	Lock down data & information. Access tightly controlled, high levels of monitoring.	AVERSE	We have a well-founded interpretation of data protection law with excellent prospects of success were it to be challenged in court, and where challenge is thought to be highly unlikely, for example considering legal precedent. Protections for personal data are excellent. Staff are highly trained, and data protection is seen as a high priority. Good organisational governance and level of resource to advise on and manage data protection issues.

Technology	New technologies viewed as a key enabler of operational delivery. Agile principles are embraced.	OPEN	Technology is an integral element in preparing young people to become responsible and capable digital citizens. Its use extends beyond supporting learning and includes the development of wider digital skills. The Trust actively embraces emerging technologies and undertakes regular horizon scanning to ensure we remain forward thinking. Appropriate safeguards, risk assessments and mitigation measures are implemented to ensure that all technological use is safe, responsible and aligned with statutory guidance and Trust policies.
Operations	Innovation supported, with clear demonstration of benefit / improvement in management control. Responsibility for non-critical decisions may be devolved.	OPEN	We are open to new ways of operating to improve, but we are keen to ensure that any risk associated with this is mitigated to a tolerable level.