



RISK MANAGEMENT POLICY

2026-2027

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May 2026

Next Review:

Spring 2027

Member of Staff Responsible:

CEO

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1. Our Vision and Values

Our Vision

DOWMAT’s vision is to foster an inclusive, nurturing environment where everyone flourishes - academically, spiritually, and personally. Rooted in Christian values, we prioritise the vulnerable, promote work-life balance, and strive to deliver exceptional education, while celebrating each academy’s unique identity—reflecting the fullness of life promised in John 10:10.

‘To love, to learn, to serve - through collaboration, honesty, and hope.’

Our Values

Love

We are committed to **Compassion and Care**: As Christ commands, we strive to love one another deeply, fostering empathy, respect, and kindness. We create a culture where we genuinely care for each other, supporting personal, professional and spiritual growth, as we walk in His love.

Learn

We are committed to **Continuous Growth and Wisdom**: Following the call to grow in knowledge and understanding, we cultivate a culture of curiosity, adaptability, and continual improvement. We encourage all to seek wisdom and learning, guided by God’s truth, that we might serve more effectively.

Serve

We are committed to **Service and Impact**: Inspired by Christ’s example of humble service, we dedicate ourselves to serving others, contributing to the well-being of our schools, communities, and beyond, bringing His light and love into all we do.

Collaboration

We are committed to **Unity in Purpose**: We value working together in mutual respect, knowing that through collaboration, we can have a greater impact supporting each other to achieve our shared vision.

Honesty

We are committed to **Integrity and Truth**: Following Christ's call to live in truth, we foster a culture of honesty, transparency, and trust, ensuring that our actions reflect His integrity in all dealings, upholding the highest ethical standards.

Hope

We are committed to **Inspiring Hope and Faith**: As bearers of Christ's hope, we instil in every individual the belief in their God-given potential to achieve great things, trusting in His plan to bring good out of all circumstances, and inspiring hope for a future filled with His promises.

2. Aims

Our trust aims to:

- Set out the framework our trust has adopted for risk management
- Identify, measure, manage, monitor and report threats to the trust's business objectives
- Embed risk management processes in both day-to-day operations and governance

3. Introduction

This policy is based on the following statutory and non-statutory guidance from the Department for Education (DfE):

- [Academy Trust Handbook](#)
- [Academy trust risk management](#)

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

Academy Trust Handbook

The Academy Trust Handbook provides the reference point for the Trust attitude and controls of risk. The Trust:

- Acknowledges responsibility for the system of internal control
- Ensures that an ongoing process is in place for identifying, evaluating and managing all significant risks
- Ensures that an annual process is in place for reviewing the effectiveness of the system of internal control
- Ensures that there is a system in place to deal with internal control aspects of any significant issues disclosed in the annual report and accounts

In assessing what constitutes a sound system of internal control, the Trust ensures that consideration should be given to:

- The nature and extent of the risks facing the organisation
- The extent and categories of risk which it regards as acceptable
- The likelihood of the risks concerned materialising
- The organisation's ability to reduce the incidence and impact of the risks that do materialise

Risk Management Objectives

The objectives for managing risk across DoWMAT are:

- To comply with risk management best practice
- To ensure risks facing DoWMAT are identified and appropriately documented
- To provide assurance to the Trust that risks are being adequately controlled, or identify areas for improvement
- To ensure action is taken appropriately in relation to accepting, mitigating, avoiding and transferring risks

4. Role and responsibilities

4.1. Chief Executive Officer

The CEO will:

- Take lead responsibility for risk management processes and the Risk Register.
- Monitor the performance of risk management processes
- Ensure that appropriate controls are in place to manage identified risks
- Prepare reports as appropriate for the Finance, Audit and Risk Committee of the Trust Board
- Ensure the risk register is reviewed annually by FARC and revisited in regular committee and Board meetings as appropriate

4.2. Trust board

The trust board will:

- Take overall responsibility for risk management, including contingency and continuity planning
- Have oversight of the risk register
- Appoint an audit and risk committee in accordance with the Academy Trust Handbook

4.3. Finance, Audit and Risk committee

The finance, audit and risk committee will:

- Direct the trust's programme of internal scrutiny
- Ensure that risks are being addressed appropriately through internal scrutiny
- Report to the trust board on the adequacy of the trust's internal control framework, including financial and non-financial controls and management of risks

4.4. Local Academy Boards

Local Academy Boards will:

- Work with the trust leadership team to identify risks and ensure plans are in place to minimise any impact on the trust and its pupils

4.5. Headteachers

Within their own schools, headteachers will:

- Carry out day-to-day risk management
- Assess operational risks
- Update the school risk register as required
- Identify and report risks to the CEO and finance, audit and risk committee

5. Risk identification

At the risk identification stage, all potential events that are a threat to the achievement of business objectives (including not capitalising on opportunities) are identified, defined and categorised.

DoWMAT's approach to risk management is linked to the strategic objectives below:

- Ensure clarity of the Christian vision, ethos and strategic direction of the Trust, enabling all adults and children to flourish
- Educational performance of the schools
- Ensure long-term success and financial viability
- Ensure compliance with charity and company law and the trusts Master and Supplemental funding agreements.

The organisation of the Risk Register ensures that links between each risk and the strategic priorities have been identified.

6. Risk measurement

Risk measurement consists of assessment, evaluation and ranking. This ensures all identified risks are compared according to a consistent standard.

6.1. Assessment

The aim of assessment is to better understand each specific instance of risk, and how it could affect business objectives. The trust will estimate:

- The likelihood (or probability) of it occurring, and
- The impact (or severity) if it did occur

Both of the above risk factors are assessed using a simple 3-point scale: high, medium and low.

6.2. Evaluation

The 'r score' for each risk's likelihood and impact respectively are combined to derive a single risk score reflecting its overall level of threat. For example, H/H, H/M, L/H.

6.3. Ranking

Once the scores for likelihood and impact have been combined into a single risk score, they will be plotted on a risk matrix (below) to determine a RAG rating for the risk. This rating determines the level of priority for risk mitigation.

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.

IMPACT	High		3	6	9	
		3				
	Medium	2		2	4	6
			2			
	Low	1		1	2	3
			1			
			1	2	3	
			Low	Medium	High	
			PROBABILITY			

7. Risk tolerance and control

7.1. Risk appetite

DoWMAT has adopted the following appetite definitions:

Risk Appetite	Definition
Risk Averse	Zero tolerance, keeping the risk as low as reasonably practical.
Risk Neutral	Willing to consider all options, choosing the one that is likely to result in a successful outcome whilst providing an acceptable level of reward for the level of risk involved.
Risk Taking	Eager to be innovative and to choose options offering potentially higher rewards, despite the greater level of risk involved.

Appetite Ratings for Risk Categories

The following risk categories have been identified, with the attendant appetite definition shown.

Risk appetite is to be reviewed annually by the Finance, Audit and Risk Committee for approval by the Trust.

It should be noted that the risk appetite statement is a guide and should not be applied rigidly in all cases as it is not possible to foresee all types of risk and circumstances may require a different approach than that indicated. It is expected that the policy will be applied intelligently by the risk managers concerned, however any material departure from the policy shall be disclosed on the Risk Register.

Category	Includes	Risk Appetite
Strategic/Reputational	Governance, compliance	AVERSE
Strategic/Reputational	Growth, partnerships	NEUTRAL
Financial	Fraud, compliance and systems	AVERSE
HR	Employment law, safeguarding and CPD	AVERSE
HR	Succession and centralisation	NEUTRAL
Estates/Facilities/H&S	H&S, compliance, data and safeguarding	AVERSE

ICT	IT provision and systems	NEUTRAL
ICT	Safeguarding and data	AVERSE
Safeguarding	Training and compliance	AVERSE
Procurement	Compliance	AVERSE
Procurement	Innovation and savings generation	NEUTRAL

7.2. Risk capacity

The trust has the following resources in place to manage risk:

- Central team capacity
- Distributed leadership and allocation of responsibility
- Regular school improvement visits to schools
- Regular safeguarding visits and audits of schools
- Regular Health and Safety audits and visits of schools
- Robust systems and processes for statutory compliance checks and assessments
- Robust monitoring and reporting to LABs and trust board

7.3. Risk control

The trust board will consider the '4 Ts' 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.

- **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

The grid below sets out the appropriate strategy to be adopted dependent on the risk appetite and risk scoring.

		Risk Appetite		
		Risk Averse	Risk Neutral	Risk Taking
Risk Score	0-2	TOLERATE/TREAT	TOLERATE	TOLERATE
	3-5	TREAT/ TRANSFER	TOLERATE/ TREAT	TOLERATE/ TREAT
	6-9	TREAT/TRANSFER / TERMINATE	TREAT	TREAT

8. Monitoring of risk

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 CEO is responsible for updating the risk register. This will be done with information provided by schools and other members of the executive team.

Based on the above, the following risk management activity will apply

Strategy	Action	
TOLERATE	Recorded on Risk Register (at scores of 0-2 this is optional). Monitored by the risk owner and Executive team as necessary. Reported annually to Finance, Audit and Risk Committee and the Trust.	monitoring
TREAT	Recorded on Risk Register. Added to the Risk Management Action Plan on individual risk as the level of risk is deemed to be unacceptable and action is required to reduce the level of risk to a more acceptable level. Plan reviewed termly by Executive Team Reported termly to the Finance, Audit and Risk Committee and the Trust.	
TRANSFER / TERMINATE	Recorded on Risk Register. Added to the action plan as the level of risk is deemed to be unacceptable and action is required to reduce the level of risk to a more acceptable level or to transfer the risk to a third party or terminate the activity. Risk reviewed more regularly by Executive Team. Reported termly to the Finance, Audit and Risk Committee and the Trust.	

9. Reporting and scrutiny

The aim of reporting risk is to provide assurance to the Trust, Executive Team and Auditors that the Trust is effectively managing its risks and has a robust system of internal controls.

The board will review the risk register annually, as required by the Academy Trust Handbook. The Risk Register will be monitored by the Finance, Audit and Risk Committee at each meeting and the Quality of Education Committee at each meeting.

The board will keep the trust's risk appetite under review and consider the ongoing appropriateness of the risk management policy. In the event of unforeseen circumstances, the board will consider the extent to which the risk was identified and measured and whether the selected control measure was appropriate.

The risk register will facilitate a rational risk-based approach for the internal scrutiny function's work programme. The audit and risk committee is responsible for directing the trust's programme of internal scrutiny, which will focus on:

- Evaluating the suitability of, and level of compliance with, financial and non-financial controls
- Offering advice and insight to the board on how to address weaknesses in financial and non-financial controls
- Ensuring all categories of risk are being adequately identified, reported and managed

10. Monitoring and review

The board will review this policy annually.

11. Links to other policies and documents

- Risk register
- Business continuity plans
- Emergency/critical incident plans

Document History

Date	Author	Summary Changes	Approved by
05.05.2026	V Shelley	Annual Review	FARC
14.05.2025	V Shelley	New Policy	Trust Board