



Risk Management and Controls Policy

Policy title:	Risk Management and Controls
Function:	<p>The school faces many different risk issues that, if poorly managed, might have a detrimental impact on its ability to achieve its vision.</p> <p>This document sets out a process to ensure the avoidance of reactive risk management and supports a proactive, thorough and effective approach to ensure the school continues to meet high educational standards, demonstrate value for money and protect its assets.</p>
Status	Approved
Statutory guidance:	Academy Trust Handbook 2025 Department for Education Academy Trust Risk Management Guidance (September 2023)
Audience:	Staff, Leaders, Trustees
Ownership:	Senior Leaders
Last reviewed:	September 2025
Reviewed by:	Audit and Risk Committee / Board of Trustees
Next review:	Autumn 2026

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Aims and Objectives

At the Blue Coat School our vision is simple. All that we do is focused on developing exceptionally well-rounded individuals with the skills to thrive and positively contribute in a rapidly changing society.

By extension, our values, approach and ethos are embodied in, and implemented through, our policies and procedures. They are the framework to support all that we do and achieve.

- 1 This document sets out a process to ensure the avoidance of reactive risk management and supports a proactive, thorough and effective approach to ensure The Blue Coat School is able to continue to meet high educational standards, demonstrate best value and protect its assets in accordance with the Funding Agreement and Academy Trust Handbook.

The school is committed to establishing a systematic and consistent approach to risk identification, analysis and control with the following objectives:

- embed risk management into the culture of the school through decision making, strategic planning and project management;
- contribute to safeguarding of students and others to whom the school has a duty of care;
- comply with statutory obligations;
- enables the school to deliver its priorities and services effectively, preserving and enhancing the delivery of education within the school;
- contributes towards the achievement of sustainable improvement;
- protect its property including the school estate, equipment, vehicles and other resources;
- reduces the number and cost of insurance and contractual claims arising;
- maintain effective control of public funds;
- support the quality of the environment;
- protect the school's reputation.

Roles and Responsibilities

- 2 The Board of Trustees fulfils its role by agreeing objectives, plans and resources by means of the budget and annual school improvement plans; establishing a system of internal control; approving and reviewing a series of underpinning policies and a means to hold school leaders to account for performance. The Board of Trustees will review the school's risk management arrangements in line with its agreed terms of reference and will receive regular reports from the Resource and Finance Committee (inc Audit and Risk sub-committee) as part of a statement of internal controls. Trustees who lead on governance in areas of school will consider relevant risks and include details in their report to the Board of Trustees.
- 3 The Headteacher will:
 - establish clear roles, responsibilities and reporting lines for managing risks;
 - provide a framework for recording and reviewing potential risks and associated actions;
 - reinforce the importance of effective risk management by offering training, good practice and other support;
 - ensure this policy is communicated to all members of staff and applied consistently.

- 4 Senior Leaders will:
 - consider risks and opportunities as part of their decision making and day to day activities for the school;
 - highlight risks and opportunities and implement agreed actions;
 - implement policies on risk management and internal control
 - advise on the fundamental risks faced by the school and help to evaluate them;
 - provide timely and sufficient information to Trustees on the status of risks and controls;
 - update the risk register at regular intervals and make available to Trustees to inform their decision making.

- 5 Employees will:
 - ensure they have read and understand all aspects of this policy;
 - comply with measures to manage risk;
 - Co-operate with agreed action plans to manage and control risk;

Procedures and Practices

General principles

- 6 The Blue Coat School views corporate risk management as an integral part of good corporate governance.

For the purpose of this document, corporate risk has been defined as something that might have a detrimental impact on the achievement of the school's objectives and jeopardise the realisation of the school's vision. Managing corporate risk is defined as encouraging innovation through a managed process, ensuring tangible and intangible assets are safeguarded.

Risk management is not about eliminating risk but about identifying and understanding it and therefore allowing it to be managed more effectively.

Attitude to risk

- 7 It is recognised that schools now work in an increasingly litigious and risk-averse society however, Trustees and senior leaders at The Blue Coat School intend to manage risk rather than avoid it and they do not intend their consideration of it to stifle innovative decision making.

The approach to assessing risk will be an integral part of school planning and project management and will be developed with the minimum of bureaucracy.

- 8 Identified risks have been prioritised with key risks included in the Risk Management and Controls Register (Annex A). Risks generally fall into the following categories: Student outcomes, Wellbeing & safety, Finance, Reputation, Operations, Strategy, Legal and compliance

- 9 Risks will be treated in accordance with the following:

Level	Action
Acceptable	Exposure to this risk is acceptable, but the risk should be subject to periodic review to ensure it does not increase and the effectiveness of current control methods remains stable.

Tolerable	Exposure to the risk is only acceptable following an investigation to identify opportunities to reduce the risk and implement additional control measures. The risk should be subject to regular review to ensure the control methods remain effective.
Unacceptable	Immediately consider whether the activity associated with the risk should cease. Any decision to continue exposure to this level of risk should be made by school management, and be subject to the development of detailed actions, on-going oversight and high-level review.

10 The following matrix will be used us a guide when assessing level of risk:

Risk Matrix Key	
Low (Acceptable)	3-7
Medium (Tolerable)	8-11
High (Unacceptable)	12-15

Based on the addition of:

- Likelihood Score

Rare	1 point
Unlikely	2 points
Possible	3 points
Likely	4 points
Almost certain	5 points

- Impact Score

Negligible	1 point
Minor	2 points
Moderate	3 points
Major	4 points
Severe	5 points

- Risk Control Score

Not started	5 points
Ineffective	4 points
Needs improvement	3 points
Acceptable	2 points
Effective	1 point

Monitoring, Review and Evaluation

11 Trustees will work closely with senior leaders to ensure it regularly considers its approach to risk management and will ensure that the Risk Management and Controls Register is monitored, reviewed and evaluated through the Audit/Risk and Finance and Resource Committees to ensure it reflects the current position for the school.

Risk ID	Date raised	Date of last review	Risk owner	Risk category	Risk description	Risk consequences	Likelihood score	Impact score	Risk Control	Overall risk score	Initial scores (no control)			Control measures			Mitigated scores		
											Control measures	Effectiveness of controls	Likelihood score	Impact score	Risk Control	Overall risk score	Change since last review	Risk acceptability (current status of the risk)	
1	01.01.25	09.03.25	Trustees	Strategy	Failure of the school to attract sufficient students to make it viable or affect the quality of education offered	Significant financial risk; confidence of parents/carers and stakeholders is diminished which causes a further negative impact and downward spiral	2	3	5	10	Oversubscribed school historically, typically over 1000 applicants for 180 places in KS3-4. New entrance exams designed to improve prospective applicants experience and strengthen partnerships with local primary schools.	Effective	2	3	2	7	↑	Acceptable	
2	01.01.25	09.03.25	Trustees	Reputation	Risk that the school receives an unfavourable OFSTED report	Parents, carers and stakeholders do not consider the school service to be valuable and of high quality, which impacts on demand and staff retention could be impacted	2	4	5	11	Robust school self-evaluation and improvement processes and procedures in place which is robust management of complaints and issues in line with school policies.	Effective	2	4	1	7	↔	Acceptable	
3	01.01.25	09.03.25	School Operations & Staff Manager	Operations	Failure to ensure that information Technology in the school is maintained to the highest standard	Data is corrupt; viruses are able to penetrate systems, IT equipment and services are not fit for purpose	3	3	5	11	Contractual arrangement with Dataspse to provide oversight, advice and assurance as to robustness of school systems	Effective	3	3	1	7	↔	Acceptable	
4	01.01.25	09.03.25	School Operations & Staff Manager	Operations	There are insufficiently robust data protection and GDPR policies and procedures	Data breach occurs or the school is found to be non-compliant with statutory responsibilities around data protection and GDPR	3	4	5	12	Established policies and procedures approved by the Board of trustees is embedded	Acceptable	3	4	2	9	↔	Tolerable	
5	01.01.25	09.03.25	Finance & Estates Manager	Operations	Failure to ensure that the school had adequate insurance cover	Significant impact on school finances, potential for litigation and associated reputational risk	2	3	5	10	School is covered by The RPA, a DFE designed insurance policy specifically for schools. As per guidance we have additional insurance cover for minibuses, drivers, engineering cover for pressure valves and specialist equipment.	Effective	2	3	1	6	↔	Acceptable	
6	01.01.25	09.03.25	Finance & Estates Manager	Legal and compliance	Failure of the school to produce open and regular management accounts	A range of potential impacts could occur including reputational issues which impact upon school's reputation and thereby demand	2	3	5	10	Finances are reported by the Finance & Estates Manager to Headteacher, Chair, Members of the Finance, Facilities & Resources, Audit and Risk Committees and ultimately reported to the Full Trustee Body as part of the governance process in accordance with the finance handbook	Effective	2	3	1	6	↔	Acceptable	
7	01.01.25	09.03.25	Finance & Estates Manager	Legal and compliance	Failure of the school to have financial management systems that prevent fraud	Potential for criminal proceedings with associated damage to school's reputation and thus impact on demand	2	4	5	11	School uses Bromcom FMS an industry standard school financial management system. Access is restricted to trusted users. Access to the system is included in internal security and review audits.	Effective	2	4	1	7	↔	Acceptable	
8	01.01.25	09.03.25	Governors	Legal and compliance	Failure of the Trust Board to ensure that the school have a robust approach to governance of the school	Processes and procedures designed to ensure robust scrutiny and assurance do not operate correctly which separates delivery of the schools objectives	3	3	5	11	Review of Trust Board process has taken place and short term improvements implemented.	Effective	3	3	1	7	↔	Acceptable	
9	01.01.25	09.03.25	Trustees	Wellbeing and safety	Failure in effective utilisation of the scheme of delegation by the Governing Body	Processes and procedures designed to ensure appropriate scrutiny and delegation do not operate correctly and the governing Body do not delegate or delegate too much to the Head or SLT which impacts on their ability to deliver and thereby jeopardise delivery to the schools objectives	3	2	5	10	Annual reviews of board membership and structure, annual evaluation of trustee work to ensure alignment with school's self evaluation process. Trustees ensure familiarity with all key strategic and operational documentation.	Acceptable	2	2	3	7	↔	Acceptable	
10	01.01.25	09.03.25	Trustees	Wellbeing and safety	Failure of the Governing Body to have procedures in place to cover the absence of the Headteacher or other members of SLT	Impact on the day-to-day running of the school which may impact on issues such as behaviour, delivery of school objectives, staff morale	4	2	5	11	There are cascading arrangements in place within the SLT and as nominated by the Headteacher.	Need Improvement	4	2	2	8	↔	Tolerable	
11	01.01.25	09.03.25	Trustees	Legal and compliance	Failure to ensure that goods and services are purchased in line with financial regulations	The school is found to be in breach of procurement regulations and is fined which impacts on the schools finances and reputation	2	3	5	10	There is delegation of duties document that identifies a separation of duties within the ordering process. Access is restricted to the purchasing process as checked via schools internal audit/scrutiny and review process.	Effective	2	3	2	7	↑	Acceptable	

Risk details				Initial scores (no control)				Control measures				Mitigated scores						
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12	01.01.25	09.03.25	Finance & Estates Manager	Reputation	Failure to ensure that suppliers of goods and services are paid in a timely and efficient manner	Suppliers refuse to supply the school leading to difficulties in sourcing goods and services required to enable the school to operate effectively or safely	2	3	5	10	Suppliers are paid to the terms of their invoices. Payment are made by BACS to fortnightly, payments are made by BACS to improve speed. There is a process in place to check supplier details are accurate. Supplier details are checked via schools internal audit/scrutiny and review process.	Effective	2	3	1	6	↔	Acceptable
13	01.01.25	09.03.25	Finance & Estates Manager	Legal and compliance	Failure to ensure that the financial reporting requirements of the school are met	Potential impacts include reputational risk, financial and other risks in the event of a successful legal challenge or criminal prosecution	2	4	5	11	Financial reporting to ESFA and trustees is carried out to latest guidance published by the DfE/Indicative in the Academies Trust Handbook. The Finance & estates manager ensures that deadlines are met and reports are accurate. The reporting process is checked via schools internal audit/security and review process.	Effective	2	4	1	7	↔	Acceptable
14	01.01.25	09.03.25	Headteacher	Wellbeing and safety	Failure to ensure that the school is compliant in relation to child welfare issues	Potential impacts include significant detriment to a child's safety causing reputational risk, financial and other risks in the event of a successful legal challenge or criminal prosecution	2	5	5	12	A Safeguarding policy is in operation and processes are robustly followed, which is strengthened by the Teaching and Learning Policy. All policies are reviewed in line with planned timetable, annual review of KCSIE by all staff and trustees, trained DSLs in place.	Effective	2	5	1	8	↔	Tolerable
15	01.01.25	09.03.25	Headteacher	Pupil outcomes	Failure to ensure that the school is compliant in respect of the legislative requirements of the school sector	Potential impacts include reputational risk, financial and other risks in the event of a successful legal challenge or criminal prosecution	2	3	5	10	Members of the SLT and key senior managers keep apprised of legislative requirements by national and local networking and newsletters. School policies are subject to a process of regular review.	Effective	2	3	1	6	↔	Acceptable
16	01.01.25	09.03.25	Headteacher	Finance	Failure to ensure that the school has robust financial processes and procedures in place	Potential impacts include reputational risk, financial and other risks in the event of a successful legal challenge or criminal prosecution	2	3	5	10	Financial processes and procedures are checked via schools internal audit/scrutiny and review process annually. Processes are included in the School's Financial Manual which is reviewed by Governor annually.	Effective	2	3	1	6	↔	Acceptable
17	01.01.25	09.03.25	Headteacher	Operations	Failure to ensure that an adequate contingency plan is in place in relation to all school systems and processes	In the event of a major incident the school has to be closed and is left unable to operate	1	5	5	11	Contingency plan in place. HLT&E Manager & School Staff & Operations manager all have copies offline	Effective	1	5	3	9	↔	Tolerable
18	01.01.25	09.03.25	Headteacher	Pupil outcomes	Reduction in demand for Sixth Form	Operation of the Sixth form is not sustainable and is no longer viable	2	4	5	11	Planned interventions from Year 10 onwards which is maintained throughout Years 10 to and 11. Established application process.	Acceptable	2	4	2	8	↓	Tolerable
19	01.01.25	09.03.25	Headteacher	Reputation	School is brought into disrepute by the actions of students	School receives adverse publicity and activities of senior leaders is called into question which impacts on demand for the school	4	3	5	12	A range of policies have been developed to avoid situations arising and prevent escalations including the Safeguarding policy, Disciplinary policy and the policy in relation to Educational Trips and Visits. Reports by local community are taken seriously and followed up with actions taken by SLT where required	Acceptable	4	3	2	9	↔	Tolerable
20	01.01.25	09.03.25	Headteacher	Finance	Design, timetabling and curriculum planning	Negative impact on financial viability and sustainability and thus the range of educational opportunities and quality of education for students	3	4	5	12	The Curriculum policy sets out the schools approach to maximising the use of the buildings. Timetabling and appropriate asset planning ensures appropriate usage and considers total number of students dictating the core offer which will then be reflected in the curriculum offer. This is reviewed annually.	Acceptable	3	4	1	8	↓	Tolerable
21	01.01.25	09.03.25	Finance & Estates Manager	Finance	Assets are not safeguarded against inappropriate use or fraud; assets not physically secure; ownership/location of assets not recorded; assets not maintained in good order. Damage/disruption due to third parties, e.g. contractors	Loss of assets could affect the school in many ways including financial sustainability, loss of operational activities and availability or quality of education	3	3	5	11	Adequate insurance against loss/damage Maintenance Plan. Maintenance of asset register Policies and procedures for asbestos, COSHH, electrical gas and fire safety, sports & gym equipment, tree safety, water hygiene, workstation assessment, Contractor selection procedure, contracts, Insurance and Health & Safety and CIBSE procedures.	Acceptable	3	3	1	7	↔	Acceptable
22	01.01.25	09.03.25	Finance & Estates Manager	Finance	Poor maintenance or external factors	Closure of the school or suspension of activity in specific areas	3	4	5	12	A programme of regular maintenance is in place, projects consultant services employed currently exploring digitised 'Every' compliance software which will provide an additional level of assurance.	Acceptable	2	4	3	9	↔	Tolerable

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							Likelihood score	Impact score	Risk Control	Overall risk score	Effectiveness of controls	Likelihood score	Impact score	Risk Control	Overall risk score	Change since last review	Risk acceptability (current status of the risk)	
23	01.01.25	09.03.25	School Operations & Staff Manager	Operations	Inadequate Planning and unreliable systems. Data not securely/confidential held leading to loss of personal/confidential information. Hacking results in data/system corruption/loss. Inadequate back-up procedures.	Loss or corruption of data results in school closure or suspension/disruption of specific activities	3	4	5	12	Ensure systems integrity, ICT Usage Policy. Register with ICO and Identified DPO. Cyber response plan in place. Internal and external audits. Cyber Insurance through RPA.	3	4	3	10	↔	Tolerable	
24	01.01.25	09.03.25	Headteacher	Pupil outcomes	Quality of teaching due to inappropriate monitoring systems or inadequate staff training, poor management/ leadership	Failure to engage students leads to a decline in outcomes	2	4	5	11	A range of policies and procedures are in place. School self-evaluation, quality assurance systems at middle and senior leadership, PPD, Capability and CPD policies, Teaching and Learning policies and a School Development Plan. There are departmental self-evaluation procedures, department development plans and a Curriculum Policy. There are also six data points P1 year for each year group which monitor progress and performance. The curriculum matches students' needs.	Effective	2	4	1	7	↔	Acceptable
25	01.01.25	09.03.25	Deputy Head	Pupil outcomes	Staff absence resulting from illness, injury, maternity, paternity	Inadequate teaching staff to deliver curriculum,	3	3	5	11	Established absence procedures in place, good relationships with local supply agency firms alongside internal supply systems ensure temporary staffing to enable adequate staffing levels. Appropriate levels of succession planning are maintained.	Acceptable	3	3	2	8	↔	Tolerable
26	01.01.25	09.03.25	Headteacher	Pupil outcomes	School is unable to recruit sufficiently to deliver full curriculum	Full range of curriculum is not able to be delivered which results on students experience and quality of teaching and potentially outcomes for students	2	4	5	11	Recruitment procedures are subject to a process of regular review. Waiting offer to staff under development to increase attractiveness of school/ employer of choice	Acceptable	2	4	2	8	↔	Tolerable
27	01.01.25	09.03.25	Headteacher	Wellbeing and safety	Staff retention levels deteriorate	Full range of curriculum is not able to be delivered which results on students experience and quality of teaching and potentially outcomes for students	2	4	5	11	Development of a new Staff Handbook is under way. Staff are supported via a Professional Performance Discussion and development encouraged via a policy on CPD. Policies are also in place to deal with concerns such as complaints or equal opportunities. There is also a Staff Welfare Group which meets regularly. Established meetings between professional associations and the Headteacher. Core subjects are overseen so the school is able to flex to cover a reduction in staffing. The school also works closely with Liverpool Hope university ITI programme which supports access to potential new staff members.	Acceptable	2	4	1	7	↔	Acceptable
28	04.04.23	08.11.23	School Operations & Staff Manager	Pupil outcomes	Examinations not adequately administered	Negative impact on outcomes for students and potential reputational damage for school	1	5	5	11	Lead trustee provides additional scrutiny of procedure if and practice. Agreed exam conduct of all assessments overseen by HT and DHT. Experienced exams data manager employed, identified support for critical tasks in the event of absence. Full training given to staff involved in process, incl. invigilators. Senior Readers notified immediately of any breach of regulations and support is sought.	Effective	1	5	1	7	↔	Acceptable
29	01.01.25	09.03.25	DSL	Wellbeing and safety	A range of risks to students' individual safety and welfare including maltreatment, child protection, anti-social behaviour, racial abuse, drug and substance misuse, abduction or bullying/cyber-bullying	Significant risk to safety, health and wellbeing of students potentially with severe consequences	3	5	5	13	Robust recruitment processes in place and maintenance of the Single Central Record Safeguarding policy. In place and robust security systems and controlled access to the site. School behaviour policy and anti-bullying policy in place. There are an ICT usage policy and regular educational sessions held with students around health, safety and wellbeing. Good inter-agency working relationships maintained. The PSW curriculum is delivered school-wide on this and there has also been investment in the Safeguarding Team. A Lead Governor inspects the Single Central Record each term.	Effective	3	5	1	9	↔	Tolerable

Risk details						Initial scores (no control)			Control measures			Mitigated scores						
Risk ID	Date raised	Date of last review	Risk owner	Risk category	Risk description	Likelihood score	Risk consequences	Impact score	Risk Control	Overall risk score	Control measures	Effectiveness of controls	Likelihood score	Impact score	Risk Control	Overall risk score	Change since last review	Risk acceptability (current status of the risk)
30	01.01.25	09.03.25	Finance & Estates Manager	Wellbeing and safety	Presence of unauthorised intruders on premises	Significant risk to safety, health and wellbeing of students potentially with severe consequences	2	4	5	11	Safeguarding policy in place and robust security systems including CCTV and controlled access to the site. Lead H&S Trustee provides additional level of scrutiny, identified H&S Co-ordinator employed by school.	Effective	2	4	1	7	↔	Acceptable