GREENSHAW LEARNING TRUST

Greenshaw Learning Trust
Risk Management Policy

The Greenshaw Learning Trust is a charitable company limited by guarantee registered in England and Wales, company number 7633694, registered at Greenshaw Learning Trust, ORU Sutton, Throwley Way, Sutton, SM1 4AF.

Policy Title	GLT Risk Management Policy	
Category	Trust Policy	
Responsible Officer	GLT Director of Finance	
Approved on	17/07/2026	
Minor technical or operational updates made	Name xx xx	Date xx xx
Review Cycle and next approval date	Three years July 2029	
Monitoring arrangements	This policy will be reviewed every three years, or sooner if required by statutory guidance updates. The implementation of this policy will be reviewed annually by the Headteacher.	

GLT Risk Management Policy

Terminology

- The Trust means the Greenshaw Learning Trust (GLT).
- School means a school or academy within the Greenshaw Learning Trust.
- Headteacher means the headteacher, executive headteacher or principal of the school/academy.
- CEO means the chief executive officer of the Greenshaw Learning Trust.
- Trust Shared Service means the services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a school Headteacher. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher should be read as the GLT CEO.
- Responsible Officer means the member of the Director Team to which responsibility for the management of the policy, procedure or statement has been delegated by the Board of Trustees.

Scope & Applicability

- It is the responsibility of the Headteacher of each school, and the GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff follow this Policy and all Policies and Procedures across the Trust.
- If there is any question or doubt about the interpretation or implementation of this Policy, the 'Responsible Officer' or the GLT CEO should be consulted.
- Unless otherwise stated, all Policies apply to all schools within the Trust, all Trust employees (including temporary and agency staff), all pupils, all trustees and committee members (including members of Community Governance Committees), all volunteers, and all visitors and contractors
- **This is a Trust Policy.** The GLT Board of Trustees has approved a set of Trust-wide policies and procedures. A Trust-wide policy/procedure is a single policy/procedure that must be followed by all schools and services in the Trust.

Introduction and Policy Statement

The Board of Trustees is responsible for determining the level of risk that Greenshaw Learning Trust (GLT) is willing to accept in pursuit of its strategic objectives and for maintaining an effective system of internal control.

This Policy operates alongside the Trust's Risk Appetite Statement and Framework. Together, these documents ensure that risk management supports strategic decision-making whilst protecting the Trust's non-negotiable obligations relating to safeguarding, health and safety, statutory compliance, cyber security and financial sustainability.

The Board recognises that risk is inherent in all activities and that avoiding all risk would hinder innovation, improvement and growth. The purpose of risk management is therefore not to eliminate risk, but to ensure that risks are identified, evaluated, treated and monitored in a manner consistent with the Trust's approved risk appetite.

Roles and Responsibilities

The Board delegates day-to-day responsibility for implementing this policy to the Chief Executive Officer (CEO), whilst retaining overall accountability for the effectiveness of the Trust's risk management framework.

Roles and Responsibilities

Board of Trustees

Responsible for:

- Approving the Risk Appetite Statement.
- Determining risk tolerance levels.
- Reviewing strategic risks.
- Ensuring appropriate assurance arrangements.
- Approving major decisions that significantly alter the Trust's risk profile.

Audit and Risk Committee

Responsible for:

- Monitoring adherence to risk appetite.
- Reviewing high and emerging risks.
- Challenging treatment strategies.
- Monitoring implementation of audit recommendations.

Committee Assurance Responsibilities

Whilst the Board of Trustees retains overall accountability for risk management, responsibility for providing assurance is shared across the Trust's committee structure.

Each committee is responsible for reviewing the principal risks, controls and assurances that fall within its delegated remit and for providing assurance to the Board that risks are being effectively identified, managed and monitored in accordance with the Trust's Risk Appetite Statement.

Where significant concerns are identified, or where risks exceed the Board's agreed appetite, the relevant committee shall ensure these are escalated promptly to the Audit Committee and, where appropriate, the Board of Trustees.

CEO (Accounting Officer)

Responsible for:

- Implementing the framework.
- Promoting a culture where risk management is integral to option appraisal and decision-making.
- Ensuring risks are appropriately treated.
- Maintaining the Risk Register.
- Escalating risks outside approved appetite.

Executive Team and School Leaders

Responsible for:

- Identifying risks and opportunities.
- Implementing controls.
- Maintaining local risk registers.
- Reporting emerging risks promptly.

Risk Management Principles

The Trust adopts the following principles:

Principle 1 – Non-Negotiables Come First

The Trust maintains an Averse appetite towards risks affecting:

- Student safeguarding and welfare.
- Health and safety.
- Financial sustainability.
- Statutory compliance.
- Cyber security and data protection.

Risks within these areas will normally be treated through avoidance or significant mitigation.

Principle 2 – Disciplined Growth

The Trust recognises that innovation, organisational development and commercial activity require measured risk-taking.

Where risks fall within Open or Hungry appetite categories, opportunities may be pursued provided:

- Strategic benefits are demonstrable.
- Sufficient organisational capacity exists.
- Risks remain within the approved appetite.
- Appropriate controls and oversight arrangements are established.

Principle 3 – Assurance-Based Decision Making

All significant decisions must be supported by evidence, assurance and documented risk assessment.

Risk Treatment Framework

Every risk recorded on the Risk Register must include a designated treatment strategy.

Avoid

The Trust will avoid risks where exposure exceeds appetite and cannot be adequately controlled.

Examples include:

- Safeguarding weaknesses.

- Health and safety breaches.
- Regulatory non-compliance.
- Unsustainable financial commitments.

Typical actions:

- Stop activity.
- Decline opportunity.
- Remove source of risk.
- Withdraw from arrangement.

Mitigate

The Trust will mitigate risks through controls that reduce either likelihood or impact.

Examples include:

- Policies and procedures.
- Staff training.
- Internal controls.
- Segregation of duties.
- Cyber security measures.
- Business continuity planning.

Mitigation is the default treatment for most operational risks.

Transfer

The Trust may transfer all or part of a risk where appropriate.

Examples include:

- Insurance arrangements.
- Service level agreements.
- Contractual indemnities.
- Outsourced specialist services.
- Commercial ring-fencing through subsidiary structures.

Transferred risks remain subject to oversight and monitoring.

Accept

The Trust may accept a residual risk where:

- It falls within approved risk appetite.
- Further mitigation is disproportionate.
- Strategic benefits justify exposure.

Acceptance must be formally authorised by the relevant decision-maker and documented within the Risk Register.

Alignment to Risk Appetite

The Risk Appetite Statement determines the preferred treatment response for each risk category.

Risk Category	**Appetite**	**Primary Treatment Response**
Student Outcomes & Welfare	Averse	Avoid / Mitigate
Health & Safety	Averse	Avoid / Mitigate
Financial	Averse	Avoid / Mitigate / Transfer
IT & Cyber Security	Averse	Avoid / Mitigate / Transfer
Business Continuity	Cautious	Mitigate
Leases & Land	Cautious	Mitigate / Transfer
Strategy & Governance	Cautious	Mitigate / Accept
People & Innovation	Open	Mitigate / Accept
Trading Company	Open/Hungry	Mitigate / Accept / Transfer

This framework ensures that treatment decisions are consistent across the Trust and aligned with Board-approved appetite levels.

Growth Opportunity Assessment

Before any significant strategic opportunity is approved, management must demonstrate compliance with the following requirements.

Capacity Threshold Test

Management must evidence sufficient leadership, operational and financial capacity to absorb the proposed activity.

Non-Negotiable Shield

No proposal may proceed if it introduces unacceptable exposure within safeguarding, health and safety, financial sustainability, compliance or cyber security.

Escalation Protocol

Any residual risk score of 12 or above must be referred to the Audit and Risk Committee with:

- Proposed mitigation actions.
- Target residual risk.
- Capacity assessment.
- Recommendation regarding treatment response.

Risk Assessment Methodology

Risk Score = Likelihood × Impact

Residual Risk = Risk remaining after controls have been applied.

Impact	Likelihood
5 (catastrophic)	5 (very likely)
4 (significant)	4 (likely)
3 (moderate)	3 (possible)
2 (minor)	2 (unlikely)
1 (no consequence)	1 (very unlikely)

In addition to scoring, management must identify:

- Appetite Category.
- Treatment Response.
- Risk Owner.
- Target Risk Score.
- Assurance Source.

Escalation Thresholds

Score	Category	Required Action
1–6	Low	Monitor and review
7–11	Medium	Mitigate where proportionate
12–15	High	Executive oversight required
16–25	Critical	Immediate escalation to Audit Committee

A risk scoring within appetite may still be accepted. A risk scoring outside appetite must be mitigated, transferred or avoided.

Assurance and Monitoring

The Trust operates a Three Lines of Assurance model:

First Line – Management

Risk ownership and control operation.

Second Line – Oversight

Executive review, governance monitoring and policy compliance.

Third Line – Independent Assurance

Internal Audit, External Audit and specialist reviews.

Risk registers will be reviewed quarterly and reported to the Audit Committee at each meeting.

The Board will receive a strategic risk report at least three times annually, including:

- Top risks.
- Risks outside appetite.
- Emerging risks.
- Control failures.
- Near misses.
- Trends and assurance outcomes.

Governing Principle

Greenshaw Learning Trust will not compromise on its non-negotiables. Within those boundaries, the Trust will take informed, proportionate and well-governed risks that support safeguarding, educational excellence, organisational resilience and sustainable growth.

Appendix 1: Risk Appetite Statement & Framework

Introduction and Purpose

The Board of Trustees of Greenshaw Learning Trust (GLT) is responsible for determining the level of risk that the Trust is willing to accept in pursuit of its strategic objectives.

This Risk Appetite Statement establishes the boundaries within which the Chief Executive Officer and Executive Team are authorised to operate. It provides a clear framework for balancing the protection of the Trust's core responsibilities with the pursuit of innovation, improvement and sustainable growth.

The framework is founded on a simple principle:
Certain risks are non-negotiable and must be avoided, whilst other risks may be accepted where they support strategic objectives and can be managed within the Trust's capacity and control environment.

This approach enables GLT to remain ambitious whilst ensuring that decisions are made in a disciplined, proportionate and risk-informed manner.

Risk Appetite Scale

GLT assesses risk using four appetite levels:

Appetite Level	Definition
Averse	Avoidance of risk and uncertainty is a primary objective. There is minimal tolerance for deviation, particularly where legal, safeguarding, safety or financial obligations are concerned.
Cautious	Preference is given to low-risk options and proven approaches. Risks may be accepted where controls are robust and potential impacts are limited.
Open	Willing to consider a range of options and balance potential risks against expected strategic benefits.
Hungry	Prepared to pursue innovative or transformational opportunities where the potential benefits are significant and risks can be effectively managed and contained.

Risk Appetite Statement

Greenshaw Learning Trust operates under a dual mandate of protection and progression.

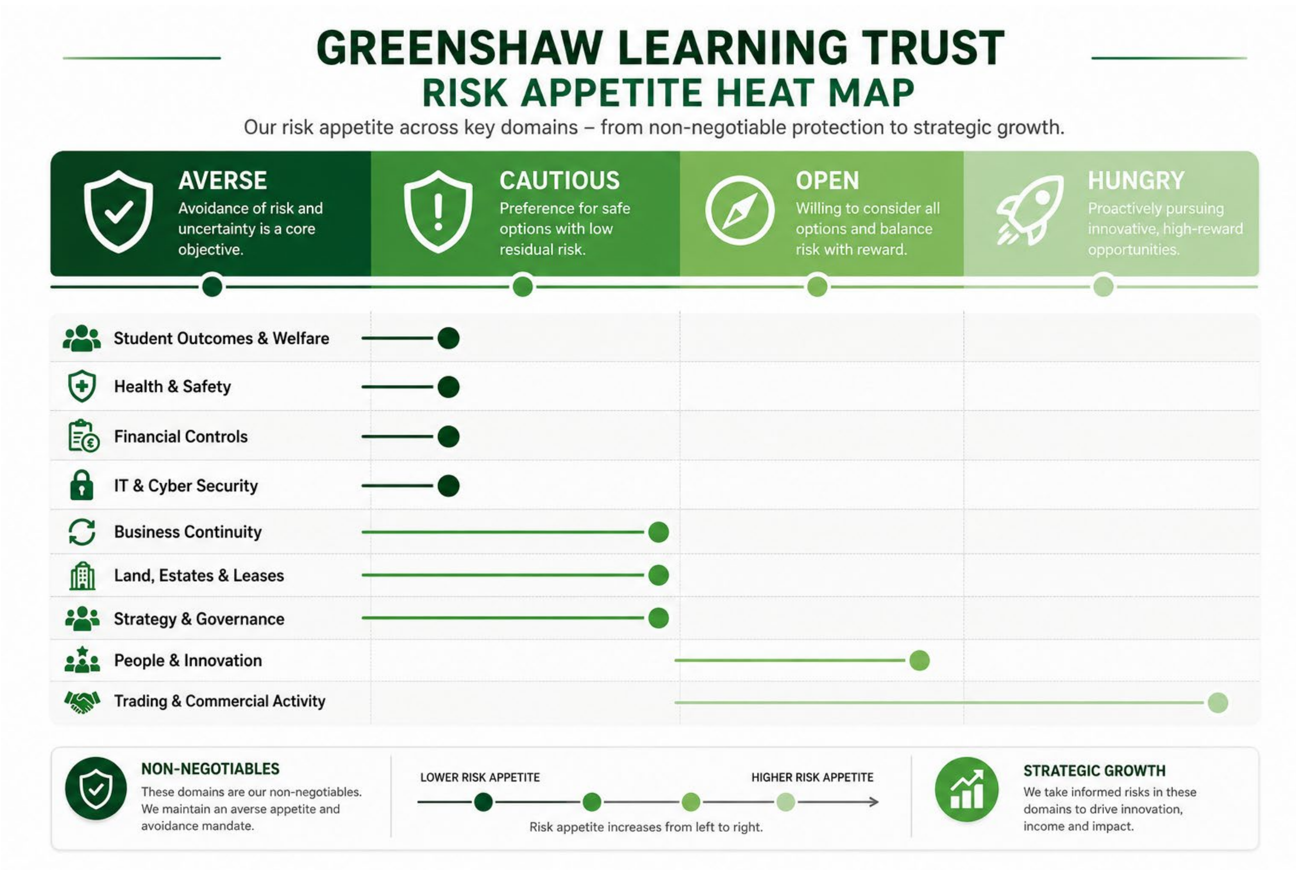
The Trust maintains an Averse risk appetite in relation to safeguarding, student welfare, health and safety, statutory compliance, cyber security and long-term financial sustainability. These areas represent the Trust's non-negotiables and form the foundation upon which all other decisions are made.

No initiative, project or strategic opportunity will proceed where it creates unacceptable exposure within these domains or where adequate mitigation cannot be demonstrated.

At the same time, the Board recognises that measured risk-taking is essential to improving educational outcomes, strengthening organisational resilience, attracting and retaining talented staff, generating additional income and delivering the Trust's strategic ambitions.

Where opportunities fall within areas of Open or Hungry appetite, the Trust will undertake a formal assessment of:

- Strategic alignment;
- Organisational capacity;
- Financial implications;
- Operational impact;
- Risk exposure; and



- Expected benefits.

The objective is not to eliminate risk, but to take informed and proportionate risks that create value whilst protecting the Trust's core responsibilities.

Core Framework: Non-Negotiables and Strategic Growth

Risk Domain	Appetite	Framework Parameters and Operational Boundaries
Student Outcomes and Welfare	**Averse**	Non-negotiable. Zero tolerance for failures in safeguarding, child protection or student welfare. Controls must ensure full compliance with statutory requirements and best practice.
Health and Safety	**Averse**	Non-negotiable. Full compliance with health and safety legislation is required. No operational activity should expose pupils, staff or visitors to unacceptable risk.
Financial Controls	**Averse**	Non-negotiable. The Trust maintains a near-zero tolerance for material control failures, unplanned deficits or breaches of the Academy Trust Handbook. Long-term financial sustainability must be protected.
IT and Cyber Security	**Averse**	Non-negotiable. Low tolerance for cyber vulnerabilities, data breaches or weaknesses that could compromise service continuity or regulatory compliance.
Business Continuity	**Cautious**	The Trust seeks high levels of resilience through robust contingency planning and low-risk operational practices.
Land, Estates and Leases	**Cautious**	Preference for predictable and sustainable estate arrangements. Major commitments must demonstrate clear strategic benefit and manageable liabilities.
Strategy and Governance	**Cautious**	Open to organisational development and governance evolution where sufficient capability, capacity and oversight arrangements are demonstrably in place.
People and Innovation	**Open**	Supports innovation in workforce planning, leadership development, recruitment and organisational culture where benefits outweigh manageable operational disruption.
Trading and Commercial Activity	**Hungry**	Willing to pursue commercial opportunities and alternative income streams that support the Trust's mission. Activities must be appropriately governed and financially ring-fenced from core educational provision.

Disciplined Risk Reduction for Growth Activities

Where GLT seeks to pursue opportunities within Open or Hungry appetite areas, the following safeguards must be applied.

Capacity Threshold Test

Before approval is granted, management must demonstrate that the Trust possesses sufficient leadership, operational and financial capacity to absorb and successfully manage the proposed activity without adversely affecting existing schools or services.

Non-Negotiable Shield

No proposal may proceed where the potential downside risk threatens any non-negotiable area of the Trust's operations, including safeguarding, student welfare, health and safety, financial sustainability, statutory compliance or cyber security.

Escalation Protocol

Any risk assessment producing a residual risk score of **12 or above (High Risk)** must be escalated to the Audit Committee for review.

Approval will only be considered where management can demonstrate a credible mitigation plan that reduces the risk to an acceptable level and remains consistent with the Trust's risk appetite.

Appendix 2: Risk Appetite Heatmap