

## COLLEGE RISK MANAGEMENT POLICY AND PROCEDURE

<b>Approving authority</b>	School Council
<b>Purpose</b>	This Policy and Procedure has been developed to ensure that Ozford College appropriately identifies and mitigates the risks of its operations.
<b>Responsible Officer</b>	Principal and Academic Director
<b>Associated documents</b>	Governance Charter Child Safe Risk Management Policy and Procedure

### 1. RATIONALE

This policy has been developed to ensure the College has appropriate risk management practices in place. It defines risk management, lists the responsibilities of staff, and articulates the principles underpinning risk management processes for achieving Ozford College's strategic objectives while ensuring appropriate management of risks.

The College is committed to manage risk effectively and addressing the management of both threats and opportunities that relate to its operation. identifies and assesses strategic level risks to determine if it can accept, avoid, reduce or minimise the risk. Ultimately, the College is committed to managing risk to maximise opportunities and safeguard its:

- employees;
- students and visitors;
- quality of higher education operations and student learning outcomes;
- image and reputation;
- customers and stakeholders;
- assets;
- contractual and statutory obligations; and
- environment.

Effective risk management strategies are dynamic and change over time as new risks arise and others may no longer be relevant. Effective risk management strategies also need to be transparent, well understood and diverse, to take account of the increased level of risk associated with the specific nature of some activities and the vulnerability of particular groups.

The **Child Safe Risk Management Policy and Procedure** should be read in conjunction with this policy as it sets out the College's identification and mitigation of child safe risks.

### 2. SCOPE

This policy and procedures applies to:

- the governing body members, the School Council
- staff directly engaged or employed by the School Council
- contracted staff ie. contracted service provider whether or not a body corporate or any other person is an intermediary) engaged to perform child-related work
- volunteers
- parents
- students; and
- the wider community.

This Policy and Procedure applies to all Ozford school environments. School environments means any of the following physical, online or virtual places, used during or outside school hours:

- A campus of the school;
- Online or virtual school environments made available or authorised by the school governing authority for use by a child or student (including email,

intranet systems, software applications, collaboration tools, and online services); and

- Other locations provided by the school or through a third-party provider for a child or student to use including, but not limited to, locations used for:
  - camps;
  - approved homestay accommodation;
  - delivery of education and training such as registered training organisations, TAFEs, non-school senior secondary providers or another school; or
  - sporting events, excursions, competitions or other events.

### 3. POLICY

#### 3.1 The College:

- views risk management in a positive context whilst mitigating risks that may cause a negative impact on activities;
- maintains awareness of risk management principles and integrates risk management into all activities;
- provides resources to maintain an uncomplicated process in managing and monitoring risks;
- makes decisions that take into account the internal and external context in which the College operates;
- reports risk activities to School Council on a regular basis; and,
- ensures staff are adequately trained to have the knowledge necessary to identify risk, understand the implications of a risk and assist with development of mitigating controls or action plans.

#### 3.2 The College develops and implements risk management strategies that:

- focus on preventing, identifying and mitigating risks related to the school environment; and
- take into account the nature of the school environment, the activities expected to be conducted in those environments (including the provision of services by contractors or outside organisations), and the characteristics and needs of all children and students expected to be present in those environments.

#### 3.3 The College acknowledges that risk is the effect of uncertainty on objectives :

- An effect is a deviation from the expected - positive and/or negative.
- Objectives can have different aspects (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organisation-wide, project, product and process).
- Risk is often characterised by reference to potential events and consequences or a combination of these.
- Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood of occurrence.

#### 3.4 The College's risk management processes will enable school staff and volunteers to identify and mitigate risks in school environments without compromising a student's right to privacy, access to information, social connections and learning opportunities. Staff are specifically responsible for identifying and for managing risk within their areas of responsibility.

#### 3.5 Where the Senior Management Team identifies risks occurring in the school environment, the College makes a record of those risks and the actions that are

taken or will be taken to reduce or remove the risks (risk controls and risk treatments).

- 3.6 As part of the risk management strategy and practices, School Council monitor and review the risks related to the College annually, including evaluating the effectiveness of the implementation of the identified risk controls.
- 3.7 The College risks will be recorded on the College Risk Register and the Child Safe risks will be recorded in the Child Safe Risk Register.
- 3.8 The Risk Registers will be reviewed by the Senior Management Team annually. The purpose of the review will be to identify any new or emerging risks, gauge the effectiveness of risk management as a whole and of specific controls for critical activities and risks. The Risk Register and any proposed changes will then be reviewed by the School Council.
- 3.9 This Policy is reviewed after any significant College incident, or at least every three years, and improved where applicable.
- 3.10 This Policy has been based on:
  - AS/NZS ISO 31000-2009 Risk management - Principles and guidelines; and
  - the Victorian Regulation and Qualifications Authority (VRQA) website resources.
  - The Ozford Institute of Higher Education policies and procedures
  - Consideration of feedback from staff, students and their families collected through surveys..

#### 4. PROCEDURES

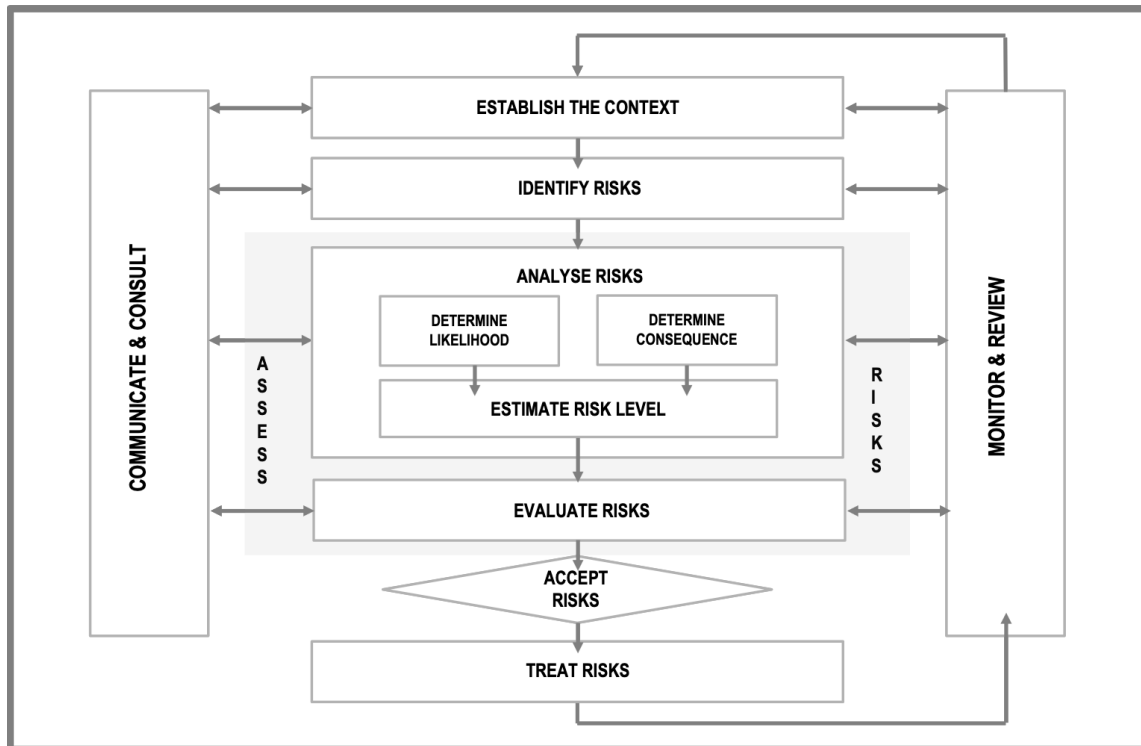
- 4.1 The School Council members are trained in their risk management responsibilities and obligations.
- 4.2 The Senior Management Team annually conducts a risk assessment that is consistent with its risk management framework as set out in Appendix 1.
- 4.3 The outcome of the risk assessment is an updated list of College risks. The identified risks will be analysed and evaluated in terms of the possible consequences and the likelihood of the risk occurring to establish an overall risk rating.
- 4.4 In consultation with staff, the Senior Management Team will establish or review the control and mitigation actions for each risk and allocate appropriate staff with risk oversight and management responsibility.
- 4.5 The outcomes from the risk assessment will be recorded in the College Risk register, how the College plans to control these risks and who has oversight of and responsibility for risk management activity.
- 4.6 The Senior Management Team will annually review the risk register to ensure that it includes all College risks, ie. the risk assessment process set out in this section will be followed.
- 4.7 The School Council will monitor the effectiveness of the controls annually as part of the risk assessment process and after any significant child safety incident.

#### 5. FEEDBACK

Feedback or comments on this Policy and Procedure is welcomed by the listed responsible officer.

## APPENDIX 1 RISK MANAGEMENT FRAMEWORK

The Risk Management Process is based upon an internationally accepted standard: ISO 31000:2018, Risk management – Guidelines, as shown below:



The above illustration is detailed within the key steps of the Risk Management framework below:

### Communicate and consult

Ongoing communication and consultation with all involved parties to ensure understanding of the process and its intended outcomes are performed by senior management. This involves collating reports for presentation to the School Council; facilitating ongoing operational reviews of risk registers, coordinating risk assessments for specific projects and ongoing advice and support to ensure compliance with this Risk Management Framework.

### Establish context

Risk management takes place within the strategic objectives of the College and has both a strategic and operational context encompassing the secondary school operations.

### Strategic Context

Strategic risk identification involves the relationship between the College and the broad external environment/community. A range of issues is considered in examining the strategic content, including:

- opportunities and threats associated with the local, regional, state and global economic, social, political, cultural, environmental, regulatory and competitive environments;
- key thrusts of stakeholder strategies; and,
- strengths and weaknesses of the Institute in attaining corporate objectives.

## Operational Context

Operational risk identification involves gaining an understanding of the College's capabilities, goals, objectives, strengths and weaknesses by considering:

- organisational structure and culture;
- geographics/demographics;
- the identity and nature of interaction with key stakeholders;
- the existence of any operational constraints;
- objectives and key performance indicators;
- business resilience vulnerabilities;
- relevant issues relating to recent change management risk, performance or audit reviews;
- relevant stakeholder community concerns or requirements;
- regulatory and contractual requirements and constraints; and,
- business management systems.

## Risk identification

Identifying risk involves compiling a list of risks which may impact on the College. Activities include:

- reviewing previous incident reports;
- undertaking internal audits and inspections to determine potential exposure;
- discussing activities at planning meetings; and,
- keeping accurate and complete records.

## Analyse Risk

Analysing risk in terms of the possible consequences and the likelihood of the risk occurring. Activities include:

- using a risk register and action plan to assist in this process;
- establishing the level of consequence of the risk occurring;
- establishing the likelihood of the risk occurring; and,
- seeking expert advice if required.

The Risk Assessment Matrix provides guidance for analysing risks:

Consequence	Likelihood				
	Almost Certain	Likely	Possible	Unlikely	Rare
Extreme	Extreme	Extreme	Extreme	High	Moderate
Major	Extreme	Extreme	High	Moderate	Moderate
Moderate	High	High	Moderate	Moderate	Low
Minor	High	Moderate	Moderate	Low	Low
Insignificant	Moderate	Moderate	Low	Low	Low

## Evaluate Risks

Assessing the level of the risk and determining whether it is within acceptable parameters. Activities include:

- using a risk register and action plan to assist in this process;
- establishing priority levels;
- determining the frequency and potential severity of potential losses; and,
- discussing with management teams.

## Treat Risk

The process of responding to risk involves developing an action plan for the treatment of risks assessed as non-acceptable, determining the person/area of responsibility with the task of implementing the action and the implementation itself.

Actions include:

Risk Treatment Options	
<b>Avoid the risk.</b>	Remove the risk source. Change of process or procedure. Don't start or continue with the activity/program.
<b>Accept the risk.</b>	Consider the risk appetite and determine the impact of the risk and whether it is acceptable to the Institute.
<b>Take a risk.</b>	Evaluate the risk vs reward in pursuing an opportunity.
<b>Change the likelihood.</b>	Reduce the probability of the risk occurring.
<b>Change the consequence.</b>	Reduce the severity of the impact that the risk may create.
<b>Share the risk</b>	Involve other stakeholders or ensure that Insurance covers negative outcomes (Never use Insurance as your only control).

In most instances risks will not be reduced by one single action that has an immediate effect. The risk may require a plan to treat the activity over time and in line with available resources/budget. This approach does not apply to extreme risks or high risks that pose an immediate threat to employees, contractors, public or assets.

Once a treatment plan has been determined it must be entered on the risk register. A timeline is agreed and a Management Action Plan or Corrective Action Request is entered onto the Risk Register.

The Risk Register is reported to the School Council who monitor that material risks are being managed and mitigated effectively.

## Monitor and Review

Risk management is an integral part of organisational processes and not isolated from the management systems. The assessment process is used to maximise opportunities in conjunction with managing threats.

The College recognises that risk management activities are not concluded when risk controls are introduced. The operating environment is always subject to change and risk controls are regularly monitored and reviewed annually to make sure they continue to be effective. Any changes required may then be implemented as part of the annual review of risk management.

The process of monitoring involves ensuring completing the action plan and measuring its achievement, particularly in relation to risks assessed as high and very high. Activities include:

- undertaking regular audits/inspections; and,
- recommending changes where necessary.

This framework is part of the continual improvement process undertaken by the College. Further improvements are based on internal reviews and changes in the legislative and regulatory environment in which the College operates and cultural changes.

## **RISK APPETITE**

Risk appetite is defined as the amount and type of risk that an organisation is prepared to pursue, retain or accept in the pursuit of strategic objectives, and the internal and external capabilities available to manage such risks.

Defining risk appetite is difficult due to the number and types of business activities and their diversity. It is important to clearly articulate the context of the risk being assessed and detail what controls will be implemented.

The following provides an overview of this important part of the framework.

In the College's operation, it is recognised that some risks are inherent and whilst controls may be applied there is a residual risk that will need to be tolerated/accepted.

The risk appetite is linked to the outcome of the risk assessment process which will assist in applying a consistent approach across the College. If the risk assessment outcome is:

- low - risk is tolerated and dealt with through normal processes;
- medium - risks are tolerated but are monitored by the Senior Management Team;
- high. - risk is to be monitored by the School Council; and,
- extreme - there is zero tolerance to these risks.

There is no risk appetite in the following circumstances:

- non-compliance with legal, professional and regulatory requirements; or
- compromising staff/contractor/public safety and welfare; or,
- decisions that have a significant negative impact on long term financial sustainability.

There is considerable appetite for the following activities:

- improvements to education services;
- improved efficiency of operations;
- when the cost of mitigating risk is higher than potential loss (unintended consequences must be investigated, and management approval sought); and,
- when short term resistance may be experienced but long term gains are proven.



### APPENDIX 2 RISK REGISTER

The Risk Register records all the risk factors that have been identified in the operating environment, along with the associated risks. It records how the College controls these risks and who has oversight of and responsibility for risk management activity. Nominated staff are required to develop risk treatment plans which are subject to review by the Management team. The Risk Register is reviewed at least annually by the School Council.

#### Impact Rating: Consequence

Risk Categories / (Context)	Consequence Categories				
	Insignificant	Minor	Moderate	Major	Extreme
Reputation (Strategic)	Negligible adverse publicity in social media.	Some adverse publicity in social media and local press.	Adverse publicity in social media and local press, which require key stakeholder management.	Extended adverse publicity in social media and local press, with requires a wider scope of key stakeholder management.	Extended adverse publicity in social media, local, national and international press, which requires a major communication plan for all stakeholders (including VRQA, VCAA etc)
Compliance (Strategic)	Omission or inaccuracy in a reporting activity that is readily corrected.	Minor non-compliance to relevant legislation. Breaches by an individual staff member.	Non-compliance with legislation which is self-reported to VRQA.	Non-compliance with legislation affecting potential loss of VRQA school registration and VCAA course accreditation.	Non-compliance with legislation affecting potential loss of VRQA school registration and VCAA course accreditation.
Operations (Operational)	No interruption to service. Inconvenience to localised operations.	Some disruption manageable by altered operational routine. Reduction in operational routine.	Disruption to a number of operational areas/campus. Closure of an operational area/campus for up to one day.	Several key operational areas closed. Disruption to teaching / course schedules or key business activities for up to one week.	Disruption to services causing the campus to completely close or no ability to operate for more than one week.
Academic (Operational)	Insignificant academic event or incident due to error	Minor academic / misconduct event or incident	Moderate academic fraud / misconduct event or incident.	Major academic fraud / misconduct event or incident	Significant academic fraud / misconduct event or incident
Financial (Strategic)	Less than \$15,000	\$15,000 to \$40,000.	\$40,000 to \$75,000	\$75,000 to \$100,000	Greater than \$100,000
WHS (Operational)	Incident with no injury.	Incident with minor injury requiring first aid.	Incident with compensable injury with medical treatment required.	Casualty or serious injury requiring hospitalisation.	Several casualties due to major incident.

#### Impact Rating – Likelihood

Description	Likelihood of Occurrence
Rare	Highly unlikely, but it may occur in exceptional circumstances.
Unlikely	Not expected, but there is a slight possibility it may occur at some time.
Possible	The event might occur at some time as there is a history of casual occurrence.
Likely	There is a strong possibility the event will occur as there is a history of frequent occurrence.
Almost Certain	Very likely. The event is expected to occur in most circumstances as there is a history of regular occurrence.



### College Risk Register

Risk Factor & Description	Risk Category -Consequence	Owner	Inherent risk assessment			Mitigating action	Residual risk assessment		
			Consequence	Likelihood	Risk Rating		Consequence	Likelihood	Risk Rating
<b>1. VRQA &amp; VCAA Standards and requirements</b> Failure to satisfy all conditions of school registration and course accreditation.	Reputation Financial Operations Compliance	Senior Management Team	Extreme	Possible	Extreme	Regular reporting to and internal reviews to be conducted and presented to School Council annually.	Extreme	Rare	Moderate
<b>2. Funding Conditions</b> Failure to satisfy all conditions of government funding	Reputation Financial	Senior Management Team	Minor	Unlikely	Low	Regular monitoring of financial statement against the conditions and reporting to the School Council	Minor	Rare	Low
<b>3.Competition</b> Competitors more established with brand, place and performance. Lack of market intelligence to inform choice of courses offered resulting in failure to meet target student numbers.	Operations	Senior Management Team	Major	Possible	High	Competitor analysis is undertaken and appropriate marketing strategies developed in response to the analysis. Extensive market research to identify areas in demand.	Major	Unlikely	Moderate
<b>4.Government legislation</b> Adapting to Change of Government and/or change to Gov't policy	Compliance	Senior Management Team	Major	Possible	High	Lobbying and networking with organisations that work with government and influence government policy Staff are made aware of changes, policies, procedures, systems and processes. Updates are made as required to reflect the changes and stakeholders informed accordingly. Staff provide annual PD log with record of professional development.	Major	Unlikely	Moderate
<b>5.Service Level Agreement Delivery</b> Lack of/ or ineffectual service contract with Ozford Business College	Reputation Financial	Senior Management Team	Moderate	Unlikely	Moderate	Ensure appropriate Service Level Agreement is in place with Ozford Business College. Monitor effectiveness of SLA from student survey.	Moderate	Rare	Low
<b>6.Academic staff &amp; teaching quality</b> Inability to recruit and/or retain quality academic staff. Poor quality teaching and lack of student academic support Failure to manage academic integrity including contract cheating	Academic Compliance Operations	Senior Management Team	Major	Possible	High	Effective staff recruitment policy and processes. Leverage from established academic networks. Monitor student performance and student feedback on teaching quality every trimester. Provide professional development on Academic Integrity for students and staff Policy and processes to monitor students and promptly respond to academic integrity issues.	Major	Unlikely	Moderate
<b>7.Student attrition /retention</b> Recruitment of poor performing students and / or inability to retain students due delivery quality issues	Academic Compliance Operations	Senior Management Team	Moderate	Possible	Moderate	Student Retention strategies Reporting on student attrition	Moderate	Unlikely	Moderate
<b>8.Student and stakeholder feedback</b> Failure to adequately capture student and family feedback and act appropriately.	Academic Compliance Operations	Senior Management Team	Moderate	Possible	Moderate	Student Feedback Policy implemented, results acted upon, and effectiveness of policy is reviewed. Stakeholder feedback is recorded and responded to by the Student Support and Services team	Moderate	Rare	Low

Risk Factor & Description	Risk Category -Consequence	Owner	Inherent risk assessment			Mitigating action	Residual risk assessment		
			Consequence	Likelihood	Risk Rating		Consequence	Likelihood	Risk Rating
<b>9. Graduate outcomes</b> Students are unable to pursue their desired education pathway	Academic Operations	Senior Management Team	Moderate	Possible	Moderate	Students are informed of pathways into and out of the courses to further study. Analysis of graduate outcomes are conducted and outcomes presented to School Council.	Moderate	Rare	Low
<b>10. Failure of internal and other financial controls to detect fraud and error.</b>	Operations Financial	Senior Management Team	Major	Possible	High	The prevention and detection of fraud and error are addressed through the policy framework, segregation of duties and clear statements of responsibilities and actions. Annual audited financial statement provides an overview the effectiveness of the actions mentioned. Independent reviews of financial controls to be conducted as needed.	Moderate	Rare	Low
<b>11. Technology failure/misuse/cyber security</b> Inadequacy of ICT environment Misuse of social media	Operations Financial	Senior Management Team	Major	Possible	Moderate	ITS team operate under Guidelines for Access Controls, Passwords and Business Continuity which apply to the College. Staff and students made aware of ICT Policy and processes	Moderate	Rare	Low
<b>12. Workplace relations</b> Application of the modern awards and the Wage Theft Act 2020 (Vic)	Operations Financial	Senior Management Team	Moderate	Unlikely	Moderate	Internal reviews confirm that the correct modern awards are applied to staff employment and appropriate professional development is undertaken by staff involved in HR matters. Pay levels are reviewed on an annual basis Payroll and employee entitlement reconciliation is completed on monthly basis	Minor	Rare	Low
<b>13. Student Safety, OHS and Well-Being</b> Incident resulting in injury Hazard or hazards in the work spaces with a risk of injury to students, staff and visitors. Incident of sexual assault & harassment on campus Pandemic risk	WHS Reputation Compliance Operations	Senior Management Team	Moderate	Unlikely	Moderate	OHS policy is enacted and measures are implemented to eliminate hazards Promotion of Staff and Student code of conduct and Critical Incident Policy Management and relevant staff are briefed on business continuity planning and critical incident response. Student support services provision is reviewed in accordance to student numbers, declared needs and feedback.	Minor	Rare	Low
<b>14. Pandemic</b> A pandemic has impacts for operations and can negatively impact on ability to attract overseas students	WHS Financial Operations	Senior Management Team	Extreme	Possible	High	The Pandemic Plan (ie. COVIDSAFE Plan) will be developed and followed to assure overseas student safety and wellbeing, and focus on safety and wellbeing in marketing and promotional materials. Work within international education networks to help promote Australia and its institutions as a study destination. Diversify markets and grow the domestic market to decrease the reliance on a small number of source countries.	Moderate	Possible	Moderate

## Inherent Risk Rating matrix

Consequence	Likelihood				
	Almost Certain	Likely	Possible	Unlikely	Rare
Extreme			1, 14		
Major			3, 4, 6, 10, 11		
Moderate			7, 8, 9	5, 12, 13	
Minor				2	
Insignificant					

## Residual Risk Rating matrix

Consequence	Likelihood				
	Almost Certain	Likely	Possible	Unlikely	Rare
Extreme					1
Major				3, 4, 6	
Moderate			14	7	5, 8, 9, 10, 11
Minor					2, 12, 13
Insignificant					

## Key to matrices

	Extreme
	High
	Moderate
	Low