

P1 S8 Risk Management Policy

Version 1 – Publication Date 18/02/2020 – Next Review Date 18/02/2022

1. PURPOSE AND POLICY CONSIDERATIONS

This policy forms part of Forus Training's internal control and governance arrangements. The purpose of this policy is to define for all staff:

- Forus Training's approach to risk management,
- the roles and responsibilities,
- the procedures to compile and report risk information,
- the process to evaluate the effectiveness of Forus Training's procedures.

2. DEFINITIONS

Forus Training defines risk as the threat or possibility that an action or event will adversely affect an organisation's ability to achieve its objectives.

Risk management involves the following:

- the identification of risks that threaten achievement of objectives,
- the evaluation of the likelihood of occurrence and potential impact of the risks identified,
- the scoring of risks according to their gravity,
- an appraisal of the techniques employed to manage the risks and identification of any further steps that should be taken,
- an appraisal of the levels of residual risk: after the application of management techniques and whether the residual level is acceptable,
- identification of the risk owner including continuous monitoring of the effectiveness of controls and management techniques,
- decision-making informed by the risk management process.

3. SCOPE

1. Academic Risk

Academic risks are those associated with the provider's academic activity.

They are primarily concerned with areas such as research risks, teaching risks and can be influenced by political risks such as funding streams.

Reputational risks should also be considered as they give way to threaten the delivery of provision to learners; in terms of the quality of teaching and learning, insufficient teaching resources, the physical environment, inadequate, improper, inappropriate and/or unfair testing methods lacking consistency or compliance to accredited standards. The learners position in having information to make informed choices, to feel confident and to feel in control; being listened to and talked to as an equal; being

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treated with honesty, respect and dignity are also areas of risk that require measuring. Those learners who do not complete their programmes pose an academic risk in that, given their status, the provider may be tempted to expedite their completion at the expense of academic standards or norms. Teacher related risks refer to those trainers who are unable to disseminate information and/or impart knowledge. This also includes trainers who are using additional outdated, irrelevant or erroneous material.

2. Commercial Risk

Risks which threaten the organisation's ability to deliver its services and serve the community.

Commercial risks include financial risks such as;

1. Insufficient registrations for programmes,
2. Insufficient funds for research/scoping programme development,
3. Continuous professional development (cpd) for trainers,
4. Maintenance and development of quality systems (this could include externality in self-evaluation studies).

The unavailability of sufficient funds to support what the provider believes is the minimum necessary for its sustainable operation presents a grave risk to that provider. This risk becomes aggravated if the shortage of funds continues over a long period of time. In that case, either the provider may have to adjust its size, activities and aspirations to its financial capabilities. This may mean the provider having to close down or, in the best case, reorganizing the provision. Mis-understanding or not being aware of the profile of local, regional and national competition also exposes the provider to risk - understanding key competitors weaknesses can enhance business performance.

3. Ethical Risk

These are those risks that relate to the core values of academic provision.

These risks include:

1. Plagiarism: using the work of others without giving them the proper credit (Trainers lack of referenced material and not appropriately promoting accurate referencing with learners),
2. Unethical research practices: ignoring safety rules, ignoring regulations and practices - in particular when it comes to research involving humans, misuse of research funds, untrue reporting of results, achievements or discoveries of un-informed consent and involvement, confidentiality, and harm to learners and other stakeholders,
3. Unethical exploitation of learners: for private purposes, unauthorized experiments, or assistance in teaching,
4. Unethical grading: allowing improper influences to dictate the grades given to learners. This risk may be the result of external influences (like trainers or management) or it may be the result of personal biases or preferences, unrelated to the learner's performance in the course.

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4. Management & Leadership Risk

Further education and training has variable management structures than most other adult learning organizations, and thus has an added collection of risks, including two specific risks:

Inability to replace a poor performing employee/trainer in a timely manner (or at all) in spite of clear evidence of non-performance.

This risk is the result of a multitude of current shortages in the adult learning teaching sector - we are currently experiencing high employment and a move towards increased permanent contracts with department of education providers.

It is difficult for a privately owned provider to offer permanent contracts to trainers as the provision of courses is much more limited and are supplied according to demand.

5. Legal & Insurable Risk

Effective management of insurable risk is crucial to the financial health overall quality assurance of a small privately owned training provider.

There are 4 main types of legal and insurable risk;

1. Personal risk,
2. Property risk,
3. Liability risk,
4. Employment practices.

Key examples of insurable risk include injury (after being exposed to a hazard), loss of life, health, fraud and loss of property from fire, weather, water damage and theft.

Providers must be diligent to claims management also.

Reputational risk may also be included (as a request) in liability insurance in the context of defamation particularly as should invasion of privacy, copyright infringement, damages to intellectual property as well as non-compliance with regulatory provisions (such as Safety & Health in the Workplace).

6. Data Protection Risk - GDPR

Data risk management addresses data quality issues and threats that could exploit weaknesses and vulnerabilities on data held by the provider.

The implementation Data Protection Impact Assessment processes are to be adopted and conducted as a function of risk identification - per defined projects rather than organisational operations as a whole -

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and specifically against high risk projects.

The fundamental GDPR challenges for QQI providers arise from the collection of learner personal data specifically PPSN and DoB details for certification purposes.

QQI state in their notice to voluntary providers, August 2018 that providers ...cannot process this data, for example by accessing it or by storing it, except for the single purpose of registering the learner with QQI for the purposes of the making of the relevant award.

To determine the impact of this harm should it occur, each risk area has been assigned descriptors over 5 levels ranging from negligible to extreme harm.

In scoring impact, the anticipated outcome of the risk is grade from 1-5, with 5 indicating a more serious Impact, as defined in the table 2 below.

4. POLICY STATEMENT

Forus Training's general approach is to minimise its exposure to risks; it will take steps to identify, assess and manage risks so as to mitigate their adverse consequences.

However, Forus Training recognises that in pursuit of its mission and academic objectives it may choose to accept an increased degree of risk. It will do so subject always to ensuring that potential benefits and risks are fully understood before developments are authorised and that sensible measures to mitigate risk are established.

This Risk Management policy is supported by related Forus Training policies.

5. PROCEDURES AND PRACTICES

Ensure that all significant risks are identified, assessed and where necessary treated and reported and in a timely manner through the QA & Academic Governance Council.

To provide a commitment to staff that risk management is a core management capability.

These objectives will be achieved by:

- Clearly defining the roles, responsibilities and reporting lines within Forus Training,
- Including risk management issues when writing reports and considering decisions,
- Continuing to demonstrate the application of risk management principles in the activities of Forus Training,
- Reinforcing the importance of effective risk management as part of the everyday work of all staff,
- Maintaining a register of risks linked to Forus Training's business, strategic and operational objectives, as well as those risks linked to working in partnership(s),

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- Maintaining documented procedures of the control of risk and provision of suitable information, training and supervision,
- Maintaining an appropriate system for recording health and safety incidents and identifying preventative measures against recurrence,
- Undertaking compliance audits,
- Preparing contingency plans to ensure business continuity where there is a potential for an event to have a major impact upon Forus Training's ability to function,
- Monitoring arrangements continually and seeking continuous improvement.

6. RELATED DOCUMENTS

A. RELATED POLICIES PROCEDURES AND FORMS

References:

[Green Paper on Provider Risk and Proportionality](#)

B. LEGISLATION / STANDARDS

1. Qualifications & Quality Assurance (Education & Training) Act 2012
2. Further Education & Training Act 2013
3. QQI Insights: Quality in Irish Further Education & Training – September 2019

7. ROLES AND RESPONSIBILITIES

Forus Training has responsibility for overseeing the management of risk within the company as a whole.

- All members of the Forus Training community have a responsibility to engage in effective risk management.
- Risks and controls will be identified within the risk framework by considering them in the context of the units and Forus Training objectives as set out in the strategic plan and unit operational plans.
- Risks will need to be managed and not necessarily avoided.
- The risk management process will be fully embedded in the normal management structures and processes so that risk issues are considered by those involved in the day to day running of Forus Training who are charged with the achievement of objectives.
- The assessment of risks will be completed at both a high strategic level that is concerned with risks fundamental to the company as a whole as well as at the level of College, Support & Research Unit.

Commercial Governance Council (CGC)

- "1) Ultimate responsibility for finance and business risk management.
- 2) Oversight and review of risk management activities.
- 3) Final approval of the Risk Management Policy and Risk Register any amendments."

Quality Assurance & Academic Governance Council (QAAGC)

- "1) Ultimate responsibility for academic related risk management.

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- 2) Oversight and review of risk management activities.
- 3) Final approval of the Risk Management Policy and Risk Register any amendments."

‘Senior Management Certification Administration’

- "1) Senior Management is responsible for leading the development and maintenance of the day to day Risk Management process. Risk management related functions must be managed at an operational level.
- 2) Senior Management will advise the relevant Councils on risk management strategies and provide periodic reports and analysis of risk findings."

8. COMMUNICATION PLAN

The Quality Assurance and Academic Governance Council (QAAGC) will identify and communicate risk management issues to all staff when necessary and through a variety of resources including briefing sessions, team meetings, daily huddles, VLE training and CPD. A risk register review will remain as a standing item on the QAAGC agenda where the QAAGC will consider and discuss emerging risks as notified. The information gathered will be used to inform performance and practice.

9. ACTIONS TO BE FOLLOWED IF THE POLICY IS NOT IMPLEMENTED

The pin policy / non-conformance procedure is followed when this policy is not adhered to. Lack of adherence to this policy may have implications for Forus Training’s status as an organisation whose policies and procedures are approved by QQI in order for Forus Training to offer validated programmes.

10. CONTACT INFORMATION

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