

CHS Risk Management Policy

Document ID	CHS Risk Management Policy
Category	Governance
Document Owner	Director, Quality and Accreditation
Approved By	Governing Board
Authorised By	Governing Board

Version Control

Version	Summary of changes	Approval date	Review Date
1.0	Document Established	Academic Board: 20 November 2018 Governing Board: 27 November 2018	27 November 2021

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1. Purpose

The Governing Board and the Academic Board as well as the Executive Management Team at the College of Health Sciences (CHS) are acutely aware of the importance of a proactive approach to risk management. The College seeks to ensure that risks are identified and treated well in advance of the any part of the College's higher education or related operations. Risk management is thus an integral part of best business practice at both strategic and operational levels.

Risk is inherent to all activities whether it is strategic decision making, delivering services, managing projects, dealing with clients and other stakeholders, purchasing new equipment, acquiring assets or carrying out operations.

The strategy adopted by CHS is that all decisions and actions must be based on careful consideration of the facts, anticipated events and other operational considerations as well as reflect both legislative and regulatory requirements. A structured risk management approach also enhances and encourages the identification of greater opportunities for improvement and innovation at policy and operational levels.

2. Scope and Strategic Context

This policy spans all activities falling within the CHS, including tasks performed by Board members, the executive team, staff and consultants or contractors, engaged in policy formulation, service design, service delivery and assurance in projects or operations. Thus, the scope of CHS's risk management may include, but not be limited to:

- Provider standing – e.g. regulatory and legislative compliance, stakeholder perceptions, media scrutiny;
- Finance – e.g. fraud, regional instability, delegations, misuse or misappropriation of funds, foreign exchange (currency), breach of contract;
- Corporate and academic governance – including business and strategic planning, governing bodies' membership, governance processes and practices;
- Primacy of academic quality and integrity – including course obsolescence, academic freedom, quality management
- Management and human resources – e.g. loss of key personnel, employees' relations, organisational culture, inappropriate resource utilisation, innovation failures, negligence
- Responsibilities to students - poor educational and support services or advice
- Physical and electronic resources and infrastructure – including work place health, safety and security, systems and tools, information and communications technology infrastructure, information and data security

CHS's risk management approach will follow risk management principles and processes enshrined in the ISO 31000:2009, with the main risk categories corresponding to the Higher Education Standards Framework (Threshold Standards) 2015. In addition, CHS shall evaluate and monitor the 11 risk indicators in the TEQSA's Risk Assessment Framework¹. Regular reports will be submitted to the CHS's ARC and through that Committee to the Governing Board and the Academic Board.

Note that CHS is a wholly-owned subsidiary of the Education Centre of Australia Pty Ltd (ECA). ECA has also undertaken to provide a range of services to CHS through shared services agreement, including the following:

¹ TEQSA's Risk Assessment Framework. V2.2, April 2018
Attachment_2.3.5(lii) CHS Risk Management Policy V1.0

- i. Finance and Financial Services
- ii. Provision of Premises and Facilities Management
- iii. Marketing and Student Recruitment Services (Management of Agents)
- iv. ICT Infrastructure and Services
- v. Legal and Compliance Matters
- vi. Shared Wages
- vii. Others/Miscellaneous

ECA implements a number of policies and plans to mitigate risks and assure compliance, these include compliance with the Education Services for Overseas Students Act 2000, the National Code 2018, Workplace Health and Safety Act (NSW) 2011, Fair Work Act 2009. In addition to exercising vigilance and an anticipative approach to risks, ECA has in place a number of emergency and risk recovery plans to deal with consequences of risks. For example, the ITS Department of ECA has a rigorous approach to protection of IST assets against hacking and also provisions for fast recovery from any potential system failure. ECA's risk management covers around 60 risk variables in 9 categories as shown in Table 1.

Table 1: Risk factors covered in ECA Risk Management

<p>A. Commercial & Legal risks</p> <ul style="list-style-type: none"> ✓ Fraud ✓ Outsourcing ✓ Negligence ✓ Breach of contract ✓ Breach of statute 	<p>B. Economic / Financial risks</p> <ul style="list-style-type: none"> ✓ Regional instability ✓ Delegations ✓ Misuse of funds ✓ Currency fluctuations 	<p>C. Technology Risks</p> <ul style="list-style-type: none"> ✓ E-Commerce ✓ IT-infrastructure ✓ Information security ✓ Weak technical RM capability ✓ Innovation ✓ Obsolescence
<p>D. Operational & Governance risks</p> <ul style="list-style-type: none"> ✓ Inappropriate organisation structure ✓ Poor or ineffective delegations ✓ Poor strategy & policy framework ✓ Frequent quality failures ✓ Dissatisfied customers & partners 	<p>E. Management</p> <ul style="list-style-type: none"> ✓ Unrealistic business/project objectives ✓ Underqualified management team ✓ Mismanagement ✓ Inappropriate use of resources 	<p>F. Human Resources</p> <ul style="list-style-type: none"> ✓ Loss of Key personnel ✓ Employee relations ✓ Labour unrest ✓ Violence
<p>G. WHS / Environmental Risks</p> <ul style="list-style-type: none"> ✓ Inadequate safety measures ✓ Poor safety management ✓ Pollution ✓ Noise ✓ Chemical contamination 	<p>H. Natural Events</p> <ul style="list-style-type: none"> ✓ Earthquake ✓ Storm ✓ Flood ✓ Bushfire 	<p>I. Political Risks</p> <ul style="list-style-type: none"> ✓ Political decisions effecting business activity ✓ On-going scrutiny by media ✓ Terrorist activity ✓ Community perceptions

CHS is relying on the ECA's risk management practices and is covered by the plans and policies implemented by ECA, including insurance policies such as the Workers Compensation Insurance, Third Party Liability Insurance, Directors and Officers Professional Indemnity Insurance, Fire Insurance etc. Nevertheless, CHS's risk management approach is comprehensive with 26 risk indicators within 7 domains (Figure 1). This is in addition to evaluating and monitoring the 11 risk indicators specified in the TEQSA's Risk Assessment Framework.



Figure 1: Risk categories covered in the CHS Risk Register

CHS is committed to conducting risk management activities in accordance with the principles and processes set out in the Risk Management Standard (ISO 31000:2009) and all other relevant legislative and regulatory instruments. In so doing CHS aims to diminish the possibility of adverse or negative events impacting on educational outcomes and strategic objectives (including financial viability and sustainability), whilst simultaneously exploiting positive opportunities to further promote CHS's success.

To ensure that this commitment is met, CHS has developed a robust system of risk management, comprising a risk management framework, policies, procedures and training to make risk management every employee's business. It is expected that all employees take interest in, and consciously manage risk within their areas of responsibility. All management strategies and activities at CHS shall be informed by proper risk management practices. CHS's planning and operational processes will integrate risk management activities, including risk identification, risk analysis and risk treatment strategies through the application of the Risk Register.

3. Principles

Based on ISO 9001:2009, pp. 7-8, for risk management to be effective, CHS shall apply the following principles:

1. **Risk management creates and protects value.** It contributes to the demonstrable achievement of objectives and improvement of performance in, for example, human health and safety, security, legal and regulatory compliance, public acceptance, environmental protection, product quality, project management, efficiency in operations, governance and reputation.
2. **Risk management is an integral part of all organisational processes.** It is not a stand-alone activity that is separate from the main activities and processes of CHS. Risk management is part of the responsibilities of Executive Management and an integral part of all CHS processes, including strategic planning and all project and change management processes.
3. **Risk management is part of decision making.** It helps decision makers make informed choices, prioritise actions and distinguish among alternative courses of action.
4. **Risk management explicitly addresses uncertainty.** It explicitly takes account of uncertainty, the nature of that uncertainty, and how it can be addressed.
5. **Risk management is systematic, structured and timely.** A systematic, timely and structured approach to risk management contributes to efficiency and to consistent, comparable and reliable results.
6. **Risk management is based on the best available information.** The inputs to the process of managing risk are based on information sources such as historical data, experience, stakeholder feedback, observation, forecasts and expert judgement. However, decision makers should inform themselves of, and should take into account, any limitations of the data or modelling used or the possibility of divergence among experts.

7. **Risk management is tailored.** It is aligned with the organisation's external and internal context and risk profile.
8. **Risk management takes human and cultural factors into account.** It recognises the capabilities, perceptions and intentions of external and internal people that can facilitate or hinder achievement of the organisation's objectives.
9. **Risk management is transparent and inclusive.** Appropriate and timely involvement of stakeholders and, in particular, decision makers at all levels of CHS, ensures that risk management remains relevant and up-to-date. Involvement also allows stakeholders to be properly represented and to have their views taken into account in determining risk criteria.
10. **Risk management is dynamic, iterative and responsive to change.** Risk management continually senses and responds to change. As external and internal events occur, context and knowledge change, monitoring and review of risks take place, new risks emerge, some change, and others disappear.
11. **Risk management facilitates continual improvement of the organisation.** Through this Plan CHS has strategies to improve its risk management maturity alongside all other aspects of its operations.

4. Objectives

CHS's Governing Board is required to meet their risk management obligations under all applicable legislation. Further, CHS's Directors have a number of duties at law, such as those outlined below:

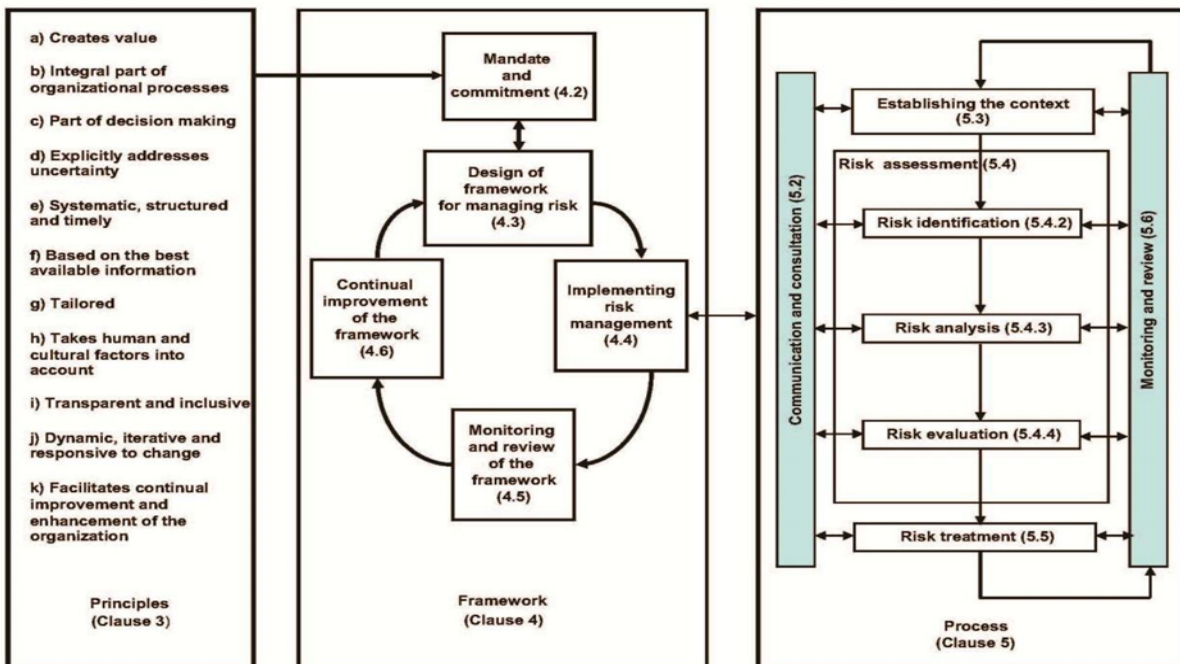
- The duty to act in the interests of a company as a whole;
- The duty not to act for an improper purpose;
- The duty of care and diligence;
- The duty to retain discretion;
- The duty to avoid conflicts of interest; and
- The duty not to disclose confidential information.

CHS's approach to risk management is to provide the foundation for its Governing Board to:

- Assure academic primacy and integrity, whilst factoring in risk management in its operations;
- Assure best legislative and regulatory compliance practice and performance;
- Take a structured approach to identify opportunities, threats and their associated risks, including consultation with relevant stakeholders;
- Assure best practice in strategic and operational decision-making and the pursuit of optimised business performance;
- Monitor and review corporate governance and academic governance performance;
- Improve stakeholders' confidence and trust;
- Optimise the costs of managing risks; and
- Minimise the loss where risks eventuate through well-planned incident management, including consultation with relevant stakeholders.

5. Framework

CHS's risk management framework comprises the components defined in ISO 31000:2009 Risk Management Standard and summarised in Figure 2.



Source: ISO 31000:2009 Risk Management Standard
Figure 2: Components of CHS 's risk management framework

a. Mandate and Commitment

CHS's Governing Board is committed to a strong risk management practice and has already appointed an Audit and Risk Committee (ARC) for the oversight of the risk management policy and practices at CHS. The Governing Board has:

- Retained responsibility for risk management whilst delegating oversight to the Governing Board's Audit and Risk Committee;
- Determined risk management performance indicators that align with CHS's key corporate performance indicators and key legal and regulatory compliance performance indicators, and which are monitored through the Risk Register;
- Aligned risk management objectives with the objectives and strategies of the organisation;
- Assigned accountability for the maintenance of the Risk Register, and the execution of risk mitigation actions and operational risk management activities to the Principal;
- Committed to the regular review of the Risk Management Policy to ensure that it remains appropriate to CHS's operating context;
- Ensured that the necessary resources are allocated to risk management; and
- Directed the Executive Management Team to ensure that the organisation's culture and risk management policy are aligned, and that the benefits of risk management are communicated to CHS's stakeholders.

b. Organisational and Operating Context

The CHS Strategic Plan 2018-23 presents an analysis of CHS's organisation and operating context. It defines key performance indicators (KPIs) for the following functions:

- Academic Management
- Learning and Teaching
- Human Resource Management
- Scholarship and Research
- Student Administration and Support
- IT Systems & Services
- Facilities and Electronic Infrastructure

CHS has developed a functional plan for each of the above-listed functions that reflects the twin goals of operational planning and proactive risk management. Each functional plan aims to achieve the respective KPIs defined in the Strategic Plan. CHS has developed a Quality Assessment Tool specifically for assessing performance of each function vis-à-vis the target KPIs. Thus, the entire system of proactive planning and operational management is informed by both operational quality and risk considerations as depicted in Figure 3.

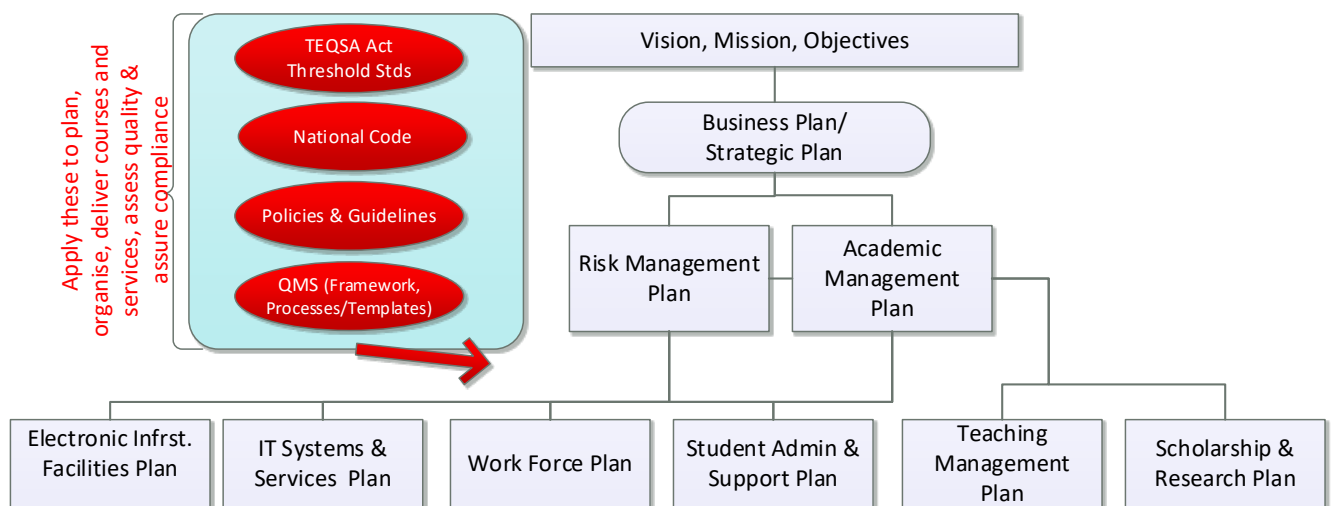


Figure 3: CHS's Integrated Planning Framework

6. Risk Assessment

a. Risk Identification

CHS has specified a number of risk factors, covering a wide range of operational and regulatory areas. These are registered in the risk register.

In identifying risk factors, care is taken to distinguish genuine risks from non-risks (normal operational issues that must be attended to routinely are not considered risks). The aim is to identify and document all knowable risks and to identify latent risks or investigate those that will change in nature with time. The dynamic nature of risk requires the process to be iterative, i.e. at any point in time the risk identification steps must be reviewed and reapplied where new potential risks may have arisen.

Input should be sought from the Executive Management Team, senior academics and senior professional staff when analysing risks, since each will have a different perspective on risks and potential impacts.

Historical records and other functional plans and documents should also be reviewed to identify risks, particularly potential non-compliance risks. All identified risk factors are recorded.

b. Risk Analysis

Risk analysis involves developing an understanding of the risk. Risk analysis provides an input to risk evaluation and to decisions on whether risks need to be treated, and on the most appropriate risk treatment strategies and methods. Risk analysis can also provide an input into making decisions where choices must be made and the options involve different types and levels of risk.

Risk analysis involves consideration of the causes and sources of risk, their positive and negative consequences, and the likelihood that those consequences can occur. Factors that affect consequences and likelihood should be identified. Risk is analysed by determining consequences and their likelihood, and other attributes of the risk. An event can have multiple consequences and can affect multiple objectives. Existing controls and their effectiveness and efficiency should also be taken into account.

The way in which consequences and likelihood are expressed and the way in which they are combined to determine a level of risk should reflect the type of risk, the information available and the purpose for which the risk assessment output is to be used. These should all be consistent with the risk criteria. It is also important to consider the interdependence of different risk factors and their sources.

The confidence in determination of the level of risk and its sensitivity to preconditions and assumptions should be considered in the analysis, and communicated effectively to decision makers and, as appropriate, other stakeholders. Factors such as divergence of opinion among experts, uncertainty, availability, quality, quantity and ongoing relevance of information, or limitations on modelling should be stated and can be highlighted.

Risk analysis can be undertaken with varying degrees of detail, depending on the risk, the purpose of the analysis, and the information, data and resources available. Analysis can be qualitative, semi-quantitative or quantitative, or a combination of these, depending on the circumstances.

Consequences and their likelihood can be determined by modelling the outcomes of an event or set of events, or by extrapolation from experimental studies or from available data. Consequences can be expressed in terms of tangible and intangible impacts. In some cases, more than one numerical value or descriptor is required to specify consequences and their likelihood for different times, places, groups or situations.

As stated, input should be sought from the Executive Management Team, senior academics and senior professional staff when analysing risks, since each will have a different perspective on risks and potential impacts. Again, historical records and other functional plans and documents should also be reviewed to analyse risks particularly potential non-compliance risks.

Categorisation of risks provide greater understanding of the relevant risk factors under each category and their interrelationship. CHS has adopted the risk categories illustrated in Figure 1.

c. Risk Evaluation

Following risk identification and analysis, each risk is evaluated to prioritise individual risks for further attention, evaluate the level of overall risk, and determine appropriate responses. Risk evaluation may be

performed using qualitative techniques to address individual risk factors or by applying quantitative techniques where possible to evaluate the combined effect of risk factors on strategic objectives and educational outcomes.

Not all risk factors are amenable to quantitative risk evaluation, as many are qualitative in nature. CHS applies a qualitative risk evaluation technique, in line with authoritative best practice². Qualitative techniques are used to gain a better understanding of individual risk factors, considering a range of characteristics such as: likelihood of occurrence, degree of impact on objectives and outcomes, manageability, timing of possible impacts, relationships with other risks, common causes or effects. Understanding and prioritising risk factors is an essential prerequisite to managing them. The outputs from qualitative evaluations should be documented and communicated to key stakeholders and form a basis for determining appropriate responses.

With reference to the risk evaluation approach adopted by CHS it should be noted that:

- The values for likelihood or impact for “before” and “after” treatment are only indicative of the status of a given risk factor at the time of analysis (the date at which the Risk Register is updated).
- As it is difficult to know the consequence of a given risk factor precisely in quantitative terms, CHS applies a qualitative approach, using descriptive terms to characterise these factors.
- While risk factors are not totally independent, the idea behind qualitative risk evaluation is to evaluate risks and ensure that they are adequately treated via tangible strategies. Thus, the relative ranking of the risk factors is achieved via the mapping shown in CHS’s *Risk Heat Map* (Figure 4) related to “before” and “after” treatment. Hence, the cumulative intent of risk treatments is to move a number of risk factors from “high” or “medium-high” category risks to “moderate” or “low” category risks.
- In ranking risks, a matrix is used that has *Insignificant (1) Minor (2) Moderate (3) Major (4) Catastrophic (5)* for consequence along one dimension and *Almost Certain (95%) Likely (80%) Moderate (50%) Unlikely (20%) Rare (5%)* for likelihood. This approach is arguably more informative than aiming to estimate numerical probability times magnitude as the basis of ranking.
- Risk treatment aims to find strategies and measures that when applied can result in the risk factors shifting from red and amber zones to yellow or green zones (Figure 4).
- The visual representation of risk factors on the Risk Heat Map helps to communicate the effectiveness of applicable risk management strategies and also monitor the position of a given risk factor on the Risk Heat Map at the time of the analysis.
- The representational model adopted by CHS is considered best current practice in management of risks and uncertainties³.

² Royal Society. 1992. *Risk Analysis, Perception and Management*. London: The Royal Society; Smallman, C. 1996. Challenging the orthodoxy in risk management. *Safety Science*, 22(1-3), 245-262.

³ Curtis, P. and Carey, M. 2012. *Risk Assessment in Practice*. Committee of Sponsoring Organisations of the Treadway Commission.

			Consequence				
			Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
Likelihood	A Almost Certain	95%	Orange	Orange	Red	Red	Red
	B Likely	80%	Yellow	Orange	Orange	Red	Red
	C Moderate	50%	Green	Yellow	Orange	Red	Red
	D Unlikely	20%	Green	Green	Yellow	Orange	Red
	E Rare	5%	Green	Green	Yellow	Orange	Orange

Figure 4: CHS Risk Heat Map

d. Risk Appetite

Risk appetite is the amount of risk, on a broad level, that an organisation is willing to accept in pursuit of value. CHS pursues mitigation of risks to compliance with the respective regulatory requirements as the number of priority and considers no compromises in this respect. CHS also seeks to add value and improve operational efficiency and quality⁴. Thus, in approaching risk management, CHS is also clear that it is as much about maximising opportunities as it is about minimising negative consequences. Hence, when analysing and evaluating risk, CHS shall consider whether or not there could be upside as well as down-side outcomes from a future event. Where a potential upside exists CHS shall consider risk treatments that enable CHS to capitalise on such opportunities should they eventuate, as well as treatments focused on mediating negative outcomes. Accordingly, CHS has adopted the following risk appetite statement:

CHS accepts low risk on student outcomes, experience and safety, as well as its compliance and regulatory obligations; low risks to teaching quality, financial and facilities management, and the development of new strategies and marketing; medium risk with commercial joint ventures and new business initiatives, and financial risk-reward; and medium risk for innovation and research.

e. Risk Treatment

The objective of risk treatment planning is to determine the set of actions which mitigate potential adverse impacts while taking advantage of positive impacts to achieve the desired outcomes. Once individual risk factors have been prioritised and the degree of overall risk exposure is understood, appropriate risk treatment strategies are developed using an iterative process which continues until an optimal set of responses has been developed. A range of possible response treatment strategies exists to mitigate risks. The College shall select a suitable treatment strategy for each individual risk, based on its characteristics and assessed priority, ensuring that the treatment strategy is achievable, affordable, cost effective, and appropriate. The use of a single treatment strategy that addresses several related risks should be considered whenever possible.

Typically, risks are divided into 3 categories, major risks (top 20%) that contribute to more than 80% of effects, moderate (the next top 20%) that contribute to the next 16% of effects and minor (the bottom 40%) that contribute to less than 4% of the total effects. It is customary to have the top 20% of risks individually

⁴ Rittenberg, L. and Martens, F. 2012. Understanding and Communicating Risk Appetite. Committee of Sponsoring Organisations of the Treadway Commission.

treated, monitored and managed. The moderate risks are grouped together, treated and managed through mitigation strategies or managed through the contractual or quality management processes. Each major risk or a group of moderate risks are assigned to a risk owner.

The risk owner is responsible for the implementation of the chosen treatment strategy. The risk owner should also monitor actions to determine their effectiveness, and identify any secondary risks which may arise. All response treatment strategies and subsequent activities should be documented and communicated to key stakeholders and incorporated into the Risk Management Plan. Figure 5 shows generic risk treatment strategies in order of preference.

Once risks have been identified, analysed, and prioritised, plans should be developed for treating each risk factor that CHS considers sufficiently important, either because of the threat that it poses to the organisational objectives or the opportunity that it offers. The planning entails agreeing upon the activities or actions (responses) to be taken and the potential changes to budget, resources, and teaching and training, student administration and support, etc., which these actions might cause.

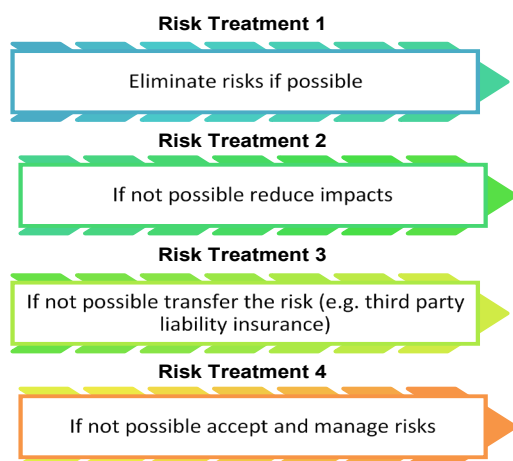


Figure 5: Risk Treatment Strategy

7. Monitoring and Review

It is essential that agreed-upon treatments are implemented otherwise risk exposure remains unchanged. It is also vital to initiate risk identification at regular intervals to assess whether or not new potential risks have arisen or existing risks have changed. This will enable the risk management team to re-evaluate the status of previously identified risks, to identify emerging and secondary risks, and to determine the effectiveness of the risk treatments already applied. The primary objectives of risk monitoring and review activities are to track identified risks, monitor residual risks, identify new risks, ensure that risk response plans are executed at the appropriate time, and evaluate their effectiveness throughout the operation life cycle.

An overview of the steps involved in the Monitor and Review Risks process at CHS is given in Figure 6. As a minimum, the Risk Register, including risk mitigation actions and the risk management activity schedule and risk indicators, shall be monitored and reviewed periodically by the Executive Management Team and at least quarterly by the Governing Board, advised by the Academic Board and the Audit and Risk Committee. Further, at a minimum, the Risk Management Plan itself shall be reviewed quarterly by the Executive Management Team and by the Governing Board, advised by the Academic Board and the Audit and Risk Committee.

8. Communication and Consultation

The degree and nature of communication and the stakeholders involved very much depends on the nature of identified risks (e.g., risk relating to commercial-in-confidence activities may not be widely discussed, whilst risk associated with workplace health and safety would benefit from a broader consultative process. Subject to this condition, communication and consultation with external and internal stakeholders should take place during all stages of the risk management process

Historically, CHS's risk communication and consultation seems to have been limited. Moving forward this will change. Plans for communication and consultation shall be developed at an early stage. These shall address issues relating to the risk itself, its causes, its consequences (if known), and the measures being taken to treat it. Effective external and internal communication and consultation shall take place to ensure that those accountable for implementing the risk management process and stakeholders understand the basis on which decisions are made, and the reasons why particular actions are required.

Communication and consultation with stakeholders is important as they make judgements about risk based on their perceptions of risk (because risk is always a perceived phenomenon). These perceptions can vary due to differences in values, needs, assumptions, concepts and concerns of stakeholders. As their views can have a significant impact on the decisions made, the stakeholders' perceptions should be identified, recorded, and taken into account in the decision-making process.

Communication and consultation should facilitate truthful, relevant, accurate and understandable exchanges of information, taking into account confidential and personal integrity aspects.

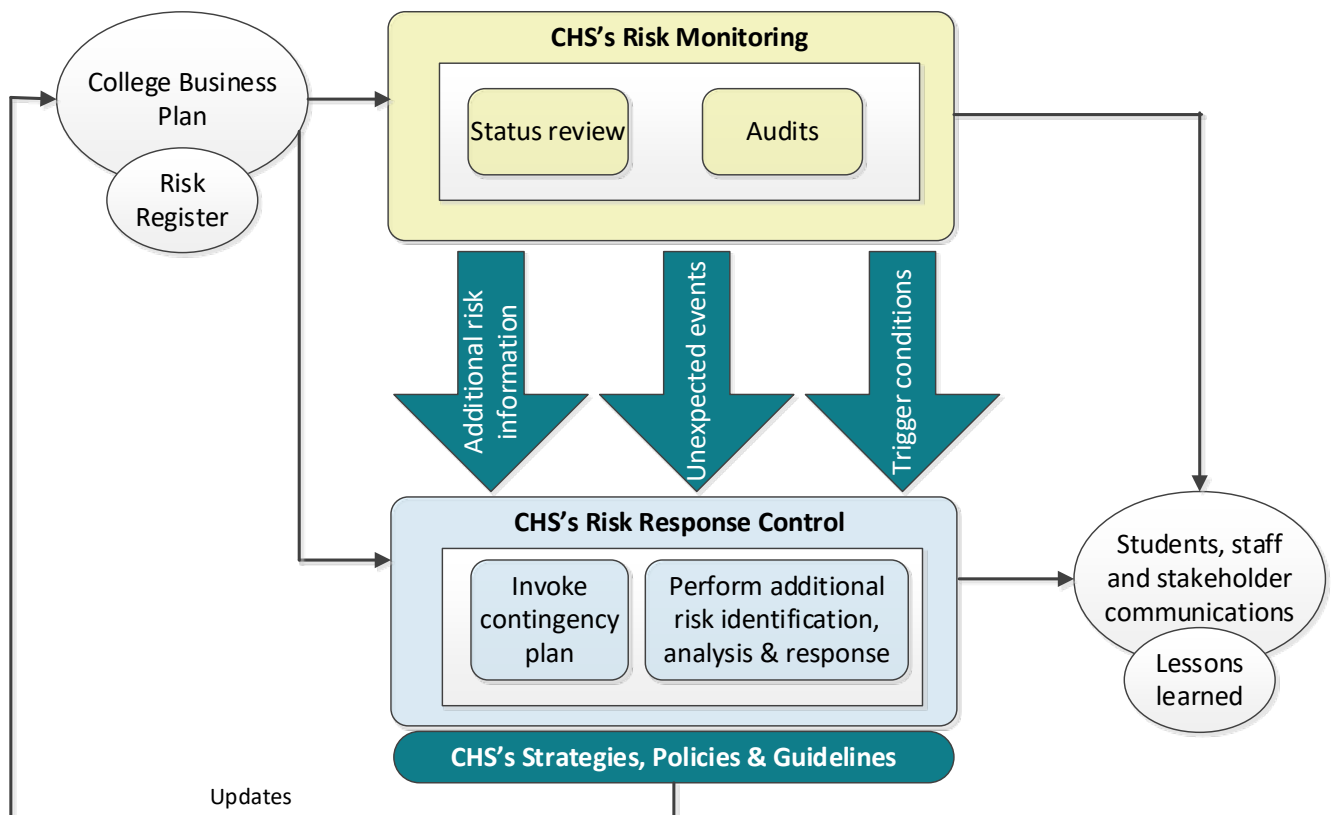


Figure 6: CHS risk monitoring and review process

9. Implementation

f. Instruments

This policy is implemented through the Governing Board's oversight, tracking and monitoring by the Risk and Audit Committee based on the CHS's Risk Management Plan and Risk Register.

g. Responsibilities

Responsibilities for managing risks at CHS are delineated thus:

- 1) The CHS's Governing Board has the ultimate responsibility for effective oversight of all risks. Directly or through its Audit and Risk Committee the GB shall monitor potential risks to CHS operations on a quarterly (or more frequent) basis, ensuring CHS applies prudent strategies to mitigate risks that may eventuate. The Governing Board shall require regular reports on status of risks from the President and may commission independent audits of the operations via its Audit and Risk Committee or employing an external consultant.
- 2) The primary focus of the Academic Board is to exercise vigilance and to monitor academic activities to ensure all risks to students and academic programs and outcomes are properly identified and mitigated by the executive team and that academic primacy, maintenance of standards, academic integrity & quality are upheld in all CHS operations.
- 3) The Audit and Risk Committee reviews the Risk Management Policy (this policy), the Risk Management Plan and the Risk Register, as well as regular reports from the Principal. The Director of Quality and Accreditation maintains the risk register and reports potential risk triggers to the Principal. The Director of Quality and Accreditation further conducts audits and prepares reports to Governing Board, including suggestions for preventive and corrective actions, and recommends strategies for improvement of risk management practices. The Committee further reviews and monitors functional plans and their execution to ensure that risks are mitigated and managed properly and opportunities are appropriately exploited. Risk management performance is assessed by the Audit and Risk Committee based on analysis of risk management KPIs, the effectiveness of risk treatment actions in the risk log, and risk management activities as recorded in the Risk Register.
- 4) The Director of Quality and Accreditation reviews and revises the Risk Register periodically. He or she shall promote a risk aware culture across operations and monitor and reports the status of risks and mitigation strategies, based on the review of the Risk Register, to the Governing Board. The Principal shall communicate risk management strategies to the Executive Management Team and provide direction to them. He or she shall communicate risk management policies, strategies and plan as appropriate to external and internal stakeholders. The Principal further reviews and monitors the execution of risk management strategies in each operational function and train key personnel in the understanding and application of risk management strategies to achieve desired goals and outcomes, which includes incorporating risk management activities into the relevant functional plans.
- 5) The Director of Quality and Accreditation assists the Principal to review and revise the Risk Management Plan periodically. Through reviewing the Risk Register, they monitor risks and their potential triggers and submit reports to the Audit and Risk Committee. They ensure risk mitigation strategies are applied prudently across operations. They cooperate with senior managers on the application of risk management strategies and train key personnel on effective risk management practices. They review risk management performance and propose process improvements.

- 6) The Principal is responsible for providing appropriate training in support of effective application of this policy.
- 7) The Dean, working with the Principal is responsible for identifying and or implementing risk mitigation strategies to all academic activities, employment of academic staffing and application of academic policies and processes in support of a holistic approach to risk management.
- 8) The Director of Administration and Student Services, working with the Principal, is responsible for ensuring that professional staffing, and student administration and support processes reflect the risk treatment strategies contained in the risk management plan.
- 9) Notwithstanding the previous points, it is important that management of risks is not left to a few risk specialists. Consequently, risk management is every staff member's responsibility, and risk management activities included as an integral part of all other CHS's management processes. Since risks can adversely affect CHS's strategic objectives, anyone with a role in achieving those objectives plays a role in the management of risks. The specific roles depend on the team members' and other stakeholders' place within CHS and their relationship to CHS's objectives. Roles and responsibilities for risk management in specific processes and projects should be clearly defined and communicated, and individuals should be held responsible and accountable for results. This includes allocating responsibility for specific activities within the risk process, as well as for resulting actions required to implement agreed-upon responses. The Director of Quality and Accreditation has a specific responsibility to ensure that risk-related lessons are captured for future use.
- 10) Conflicting interests, that is between the risks associated with strategic opportunities and risks to performance or compliance are resolved by the Governing Board, based on advice from the Academic Board, Audit and Risk Committee, and the Executive Management Team, as appropriate.

10. Monitoring and Review of the Risk Framework

The Risk Framework shall be reviewed every 3 years by the Governing Board advised by Academic Board and the Audit and Risk Committee, with particular attention paid to the currency of CHS's risk appetite statement. The Risk Management Plan and Risk Register shall be reviewed on a quarterly basis by the Governing Board advised by Academic Board and the Audit and Risk Committee.

The Risk Register shall be reviewed at least quarterly by the Principal assisted by Director of Quality and Accreditation, or as events dictate.

11. Continual Improvement of the Risk Framework

CHS has adopted a continuous improvement approach in all of its planning and operations. Under this approach the performance of the whole risk management practice is evaluated in each operational period, and based on the lessons learnt changes are introduced to improve the effectiveness of risk management practices in the next operation period.

12. Related Documents

- Risk Management Plan
- Risk Register and Treatment
- CHS Strategic Plan 2018-23

- Academic Management Plan
- Facilities and Electronic Infrastructure Plan
- CHS Student Administration and Support Plan
- CHS Workforce Plan

13. Regulations and Legislations

- Education Services for Overseas Students Act 2000.
- National Code 2018.
- Higher Education Standards Framework 2015
- ISO. 2009. ISO 31000. Risk Management – Principles and Guidelines.
- Workplace Health and Safety Act 2011 (NSW)
- Risk Assessment Framework. Version 2.2, TEQSA. 2018.