

Board of Management Audit Committee

Date of Meeting	Wednesday 14 November 2018
Paper No.	AC2-C
Agenda Item	6
Subject of Paper	Risk Management Policy Review
FOISA Status	Disclosable
Primary Contact	Paul Clark, College Secretary/Planning
Date of production	27 September 2018
Action	For Approval

1. Recommendations

1. To approve the revised Risk Management Policy, subject to any agreed changes.

2. Purpose of Report

2.1 The purpose of this paper is to provide the Audit Committee with an opportunity to revise and approve the College Risk Management Policy.

3. Strategic Context and Key Points

3.1 Risk Management is a key component of the College's internal control and governance arrangements, and as such is an important responsibility of the Audit Committee, Senior Management Team and the Board of Management.

3.2 The last significant change to the Risk Management Policy, in 2016, comprised a more comprehensive outline of the College's approach to risk, including reference to "risk tolerance". This was in recognition of the College's need for greater flexibility and analysis of risk, as the College looked to address the new Strategic Priority 8: "To secure our diversity of income and remain competitive", and also Strategic Priority 6: "To be efficient, effective, innovative, and vigilant" - in particular the "innovation" element. Definitions, the distinction between risk appetite and risk tolerance, and tolerance categories are provided within the Policy.

3.3 The current revision proposes only minor changes, including a revision to the section on Risk Tolerance as it relates to Business Continuity at Para 6.9. This acknowledges that minor incidents, poorly managed, can have significant negative impacts upon the College, for example reputational damage via social media. Other changes relate to clarity of language and formatting.

4. Impact and Implications

4.1 The effective management and control of risks is essential to the on-going stability and future growth of the College, with clear implications in terms of potential impact upon College students and staff, as well as the College's wider reputation. All strategic risks have a potential strategic impact upon the College and the achievement of all eight strategic priorities. The College Risk Register includes matters relating to legal compliance, and financial sustainability.

4.2 The revised Policy now distinguishes between the acceptable levels of tolerance which the College has for different areas such as legal compliance, reputation, and business continuity (no tolerance) and development or change activity (variable tolerance).

Appendix:

Risk Management Policy (Draft V2.2)



Risk Management Policy

© 2018 City of Glasgow College

Charity Number: SC0 36198

Table of Contents

Risk Management Policy 1

1. Introduction 3

2. Purpose and Aims 3

3. Scope 3

4. Policy Statement..... 4

5. Definitions 5

6. Responsibilities 10

7. References 12

 7.1 Policy Framework 12

 7.2 Other College Policies 12

 7.3 External References 12

8. Document Control and Review 13

9. Revision Log 14

Risk Management Policy

1. Introduction

1.1 This Risk Management Policy and the associated Risk Management Procedure form part of the College's internal control and corporate governance arrangements. The College's approach to risk management is inclusive, reflecting the College's key value of Integrity, Honesty, and Transparency.

2. Purpose and Aims

- 2.1 The Policy explains the College's underlying approach to risk management, and documents the roles and responsibilities of the Board of Management and the Executive Leadership Team, in developing a culture of risk management throughout the College.
- 2.2 The associated Risk Management Procedure document outlines the key aspects of the risk management process, and identifies the main reporting procedures. In addition, it describes the process the Board of Management will use to evaluate the effectiveness of the College's internal control procedures.

3. Scope

3.1 This policy applies to all College activities, and at all levels within the organisation. While the identification and management of risk is seen as a key responsibility of the College Board of Management, the Executive Leadership and Senior Management Teams, managers at all levels within the College are encouraged to consult with staff in identifying risks to the College. The escalation route for risk identification is outlined in the College's Risk Management Guidance document.

4. Policy Statement

4.1 Key Principles

The following key principles outline the College's approach to risk management and internal control:

- 4.1.1 The Board of Management has responsibility for overseeing risk management within the College as a whole. Regular monitoring of Risk is undertaken by the Board Audit Committee;
- 4.1.2 The College adopts an open and receptive approach to risk identification and management;
- 4.1.3 The Principal and the Executive Leadership Team supports, advises and implements policies and strategies approved by the Board of Management;
- 4.1.4 The College makes conservative and prudent recognition and disclosure of the financial and non-financial implications of risks;
- 4.1.5 Senior managers are responsible for encouraging good risk management practice within their areas of responsibility;
- 4.1.6 Senior Managers, and those responsible for reviewing risks take into account the possibility of the differential impact of risks, and risk treatments, upon people who share protected characteristics¹.
- 4.1.6 Key risk indicators will be identified and closely monitored on a regular basis.
- 4.1.7 The College would, in general, seek to treat risks with the potential of negative impact prudently. However the Board of Management and Executive Leadership Team (ELT) recognises the possibility of positive outcomes in the treatment of risks, and accordingly will be careful to evaluate each risk individually. "Risk Appetite" and "Risk Tolerance" will be determined by the Board with guidance from ELT. (See 7.1.1 below).

¹ <http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/>

5. Definitions

5.1 HM Treasury defines “Risk” thus:

“Risk is defined as this uncertainty of outcome, whether positive opportunity or negative threat, of actions and events. The risk has to be assessed in respect of the combination of the likelihood of something happening, and the impact which arises if it does actually happen”². In agreement with the approach taken by the New Campus Project, risk in the context of the City of Glasgow College will focus upon those uncertain events, which would, if they occurred, result in a negative impact on the operation and objectives of the College.³ This is the definition of risk understood in all College documents relating to Risk Management.

5.2 BS 31100:2008 defines Risk Tolerance and Risk Appetite⁴ thus:

Risk Appetite - “the amount and type of risk that an organisation is prepared to seek, accept or tolerate”.

Risk Tolerance – “the organisation’s readiness to bear the risk after risk treatments in order to achieve its objectives”.

In broad terms, appetite relates to willingness to seek potential benefits, while tolerance sets limits on acceptable loss in pursuit of these benefits. The Institute of Risk Management states that: “While risk appetite is about the pursuit of risk, risk tolerance is about what an organisation can actually cope with.”⁵ In short, the terms relate to whether an organisation is respectively “willing” and “able” to take the risk, or sustain the potential consequences of the risk.

These are the definitions of the respective terms understood in all College documents relating to Risk Management

² HM Treasury Orange Book

³It should be noted, however, that the opportunity for a positive outcome should not be overlooked in the management of risks.

⁴ Ref: RIMS (Risk Management Society) Executive Report: Exploring Risk Appetite and Risk Tolerance; 2012.

⁵ <https://www.theirm.org/knowledge-and-resources/thought-leadership/risk-appetite-and-tolerance/>

6. Risk Tolerance

6.1 The College's approach is to minimise its exposure to reputational, compliance and financial risk, whilst accepting and encouraging an increased degree of risk in pursuit of its mission and objectives. In the case of certain risks there is no clear strategic benefit from accepting them, e.g. risks associated with unethical, illegal, or inappropriate actions, while some other risks are not inherently undesirable, e.g. where economic gain or student benefit might reasonable be expected⁶. The College therefore recognises that its appetite for risk varies according to the activity undertaken, and that its acceptance of risk is subject always to ensuring that potential benefits and risks are fully understood before developments are authorised, and that appropriate measures to mitigate risk are established.

The College's position with regard to risk across seven categories is described below in a series of statements for each category, and the risk tolerance for each category is set utilising a tolerance scale of 1 to 6. (Low to High).

6.2 Reputation – It is regarded as critical that the College preserves its good reputation. The College has a low level of acceptance of such risk, given the difficulty of rectifying reputational damage. The College therefore has no appetite for risk in the conduct of any of its activities that puts its reputation in jeopardy, could lead to undue adverse publicity, or could lead to loss of confidence by the College's stakeholders.

Risk tolerance level = Low (1).

6.3 Compliance – The College places great importance on compliance, and has no appetite for any breaches in statute, regulation, professional standards, bribery or fraud. There is clearly no strategic benefit to accepting this kind of risk, and a significant threat to the organisation in the case of failure.

Risk tolerance level = Low (2).

⁶ Ref: HBR June 2012; Managing Risks: A New Framework; Kaplan and Mikes

6.4 Financial – The College aims to achieve long term financial viability and overall financial strength. Any activity which has a risk score RAG-rated Amber or Red, where the financial impact is greater than 1% of total income, exceeds the College's risk tolerance. However the College is resilient to a degree of financial risk and, given the potential of strategic gain, is in a position to consider acceptance of a degree of financial risk.

Risk tolerance level = Medium (3).

6.5 Education and Student Experience – The College intends that its students will be inspired and stimulated to develop a lifelong desire for knowledge and learning, and therefore encourages a pioneering and innovative approach to learning delivery, and a willingness to try new approaches. It recognises that this should involve an increased degree of risk in developing and enhancing the student experience, and is comfortable in accepting this risk, subject always to ensuring that potential benefits and risks are fully understood and that sensible measures to mitigate risk are established.

Risk tolerance level = Medium (3).

6.6 Major Change or Development Activities (e.g. projects, collaborations, non-grant income generating activity) – Major change or development activities are required periodically in pursuit of the College's Strategic Priorities. The College expects such changes to be managed according to best practice in project and change management, and has low appetite for deviating from such standards. However the College recognises that, from time to time, certain initiatives may carry greater than usual risk.

Risk tolerance level = Medium (4).

6.7 Environment and Social Responsibility – The College wishes to make a significant, sustainable, and socially responsible contribution to Glasgow and Scotland through its education and operational activities. It recognises that this should involve an increased degree of risk and is comfortable in accepting this

risk, subject always to ensuring that potential benefits and risks are fully understood and that sensible measures to mitigate risk are established. For example, if social responsibility or environmental issues are prioritised above other considerations, there may be a potential negative impact in other respects (e.g. financial). Examples: A community benefit may be a greater priority than a financial benefit if that is the strategic priority or defined policy. Widening access initiatives may negatively impact upon student success PIs, and may impact upon student support funds. These kinds of initiatives therefore carry a strategic risk which the College may be willing to accept (appetite) and capable of withstanding the consequences of (tolerance).

Risk tolerance level = Medium (3).

6.8 People and Culture – The College will pursue efforts to value, support, develop and utilise the full potential of its staff. The College places importance on a culture of equality and diversity, dignity and respect, collegiality, the development of staff, and the health and safety of staff, students and visitors. It has low appetite for any deviation from generally recognised standards in these areas, and is able to accept a small degree of risk in pursuit of these standards. Also, given the resilience developed via investment in staff development, the College may also from time to time accept loss of experienced staff.

Risk tolerance level = Low (2).

6.9 Business Continuity – The College will ensure that mitigations are in place for significant incident/disaster management and recovery. **While recognising that there is considerable variation in the severity of such incidents**, and that the likelihood of major incidents is low, there exists the possibility of major disruption to service provision. **It is also recognised that the poor management of a relatively minor incident may have significant repercussions, such as reputational damage via social media.**

Risk tolerance level = Low (1).

6.10 Risk Tolerance and Acceptable Risk Score

A low tolerance would imply a lower limit of acceptable risk score.

The table below aligns the College’s tolerance for risk across activity headings with the 5 x 5 (Impact x Likelihood) risk score matrix in the Risk Register as indicated. The risk tolerance level varies across the categories of College activity and correspondingly so too does the upper limit of acceptable risk score:

Tolerance Category (Strategic Theme Quadrant)	Low		Medium		High	
	Limit of Acceptable Risk Score		Limit of Acceptable Risk Score		Limit of Acceptable Risk Score	
	1-3	4-5	6-9	10-12	15-16	20-25
Tolerance Scale 1-6						
Reputation (Growth and Development)	1	2	3	4	5	6
Compliance (Processes and Performance)		2	3	4	5	6
Financial (Finance)			3	4	5	6
Student Experience (Students)			3	4	5	6
Major change and development activities (Growth and Development)				4	5	6
Environment and social responsibility (All Strategic Themes)			3	4	5	6
People and Culture (Growth and Development)		2	3	4	5	6
Business Continuity (Processes and Performance)	1	2	3	4	5	6

7. Responsibilities

7.1 Role of the Board of Management

The Board of Management has a fundamental role to play in the management of risk. Its role is to:

7.1.1 Set the tone and influence the culture of risk management within the College. This includes:

- Determining whether the College is 'risk taking' or 'risk averse' as a whole or on any relevant individual issue (i.e determining "risk tolerance" for each risk);
- Determining what types of risk are acceptable and which are not;
- Setting the standards and expectations of members of staff with respect to conduct and probity.

7.1.2 Approve major decisions affecting the College's risk profile or exposure.

7.1.3 Monitor the management of significant risks to reduce the likelihood of significant adverse outcomes.

7.1.4 Seek assurance that the less significant risks are being actively managed, with the appropriate controls in place and working effectively.

7.1.5 Review risks annually.

7.1.6 Review annually the College's approach to risk management and approve changes or improvements to key elements of its processes and procedures.

7.1.7 Review annually the effectiveness of internal control of the College, based on information provided by the Executive Leadership Team. Its approach is outlined in the Risk Management Procedure.

7.2 Role of the Executive Leadership Team

The key roles of the Executive Leadership Team are to:

7.2.1 Implement policies on risk management and internal control;

7.2.2 Identify and evaluate regularly the significant risks faced by the College for consideration by the Board of Management;

7.2.3 Ensure appropriate channels are in place to enable risk reporting at all levels of the organisation, and through these levels to the ELT and thence to the Risk Register. For example, risk identification and reporting will be regularly reviewed at operational team meetings, minuted where appropriate, and escalated via teams to the Senior Management Team and ELT.

7.2.4 Provide adequate information in a timely manner to the Board of Management and its committees on the status of risks and controls;

7.2.5 Undertake an annual review of effectiveness of the system of internal control and provide a report to the Board of Management.

8. References

8.1 Policy Framework

Associated Policies and Procedures	Title
Policy Framework	Planning
Policy	Risk Management Policy
Procedure	Risk Management Procedure

8.2 Other College Documents

Other College Documents	Title
To note	Risk Guidance Document

8.3 External References

Source	Title/Link
MH Treasury	Orange Book
RIMS (Risk Management Society)	Executive Report: Exploring Risk Appetite and Risk Tolerance; 2012.
IRM (Institute of Risk Management)	https://www.theirm.org/knowledge-and-resources/thought-leadership/risk-appetite-and-tolerance/
Harvard Business Review	HBR June 2012 Managing Risks: A New Framework; Kaplan and Mikes https://hbr.org/2012/06/managing-risks-a-new-framework

9. Document Control and Review

Approval Status	Approved
Approved by	Approved by Board of Management Audit Committee
Date Approved	19 Sept 2011 Version 1.1: Recommended by ELT for approval by Board under Chair's action (8/2/12); 28/11/16: Version 2.1 approved by Audit Committee 14/11/18: Version 2.2
EQAI Status	EQIA Conducted? Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Proposed Review Date	December 2020
Lead Department	College Secretary/Planning
Lead Officer(s)	Principal; College Secretary/Planning
Board Committee	Audit Committee
Copyright © 2018 City of Glasgow College	Permission granted to reproduce for personal use only. Commercial copying, hiring lending, posting online is strictly prohibited

10. Revision Log

Version Date	Section of Document	Description of Revision
Version 1.1 12 02 2013	Various	Version 1.1 (12/02/13): revised post titles and responsibilities relating to these changes.
	4.1.3 (formerly 2.1.3)	Insert: "and strategies" after "policies"
	6.1.1 (formerly 3.1.1) bullet 1	Insert "for each risk" after "risk appetite";
Version 1.2 21 03 2013	All	Policy redesigned within new College Policy template (June 2012). Order of text rearranged under template headings.
	1.1	Insert: "The College's approach... Transparency".
	2.1	Replace 'This reflects the development of a' with "in developing".
	5.	New section "Definitions" added. Text mirrors that in Risk Guidance document.
	6.1.3	Insert "where appropriate" after "minuted"
Version 1.3 4 April 2013	All	EQIA undertaken with revised EQIA proforma.
	4	Insertion of 4.1.6 relating to people who share protected characteristics, including footer link to EHRC definitions of "protected characteristics".
	7.2	To note: Risk Guidance Document
	8.	Approval Status clarified
Version 1.4 20 12 13	All	Checked for consistency with new Risk management approach
	7.1	Added Planning: Risk document to list of associated documents
Version 1.5 04 12 14	6.2.3 8	Minor revision to reflect new job titles/responsibilities.
Version 2/2.1 28 11 16	5.2 6 7.1.1 8.2 8.3	Insertion of Risk Appetite and Risk Tolerance definitions Addition of new section: Risk Tolerance Reference to Risk Tolerance "College Documents" replaces "College Policies" Added references to source guidance (RIMS/IRM/HBR)
Version 2.2 14 11 18	6.9 All	Revision of Risk Tolerance: Business Continuity Section. Minor language and format improvements throughout.