South West Community College

Risk Management Policy

1. Purpose

This Risk Management Policy for Bunbury Regional Community College Inc. trading as South West Community College (SWCC) seeks:

- to ensure the safety, security and wellbeing of students, staff, volunteers, and visitors;
- to ensure SWCC delivers a satisfactory standard of education;
- to ensure the continued smooth and successful operation of the College;
- to minimise the legal, financial, physical, technological, and reputational risk to SWCC.

Risk management involves a series of well-defined steps that support better decision making by facilitating a clearer insight into risks and an appreciation of their potential effect. Risk management principles should be incorporated at all levels of decision making.

2. Related Documents

WHS Policy and Manual.

Risk Register

Emergency & Critical Incidents Policy.

Evacuation Procedures.

3. Definitions

Control refers to a measure that modifies a risk.

Critical incident is an incident in which there is a high likelihood of traumatic effects or evoking unusual or unexpectedly strong emotional reactions, which have the potential to interfere with the ability of the individual, group, or school to function either at the time or later. A circumstance posing a “critical risk” for the purposes of this definition is one which would, if action had not been taken or the risk otherwise averted, have resulted in death, life-threatening illness, or life-threatening injury to one or more students and/or staff.

Incidents (General) are any one or more of the following:

- Near miss i.e. acts, omission, events circumstances that occur that could have caused harm to the person;
- Injury (including self-harm) or risk of serious harm and serious injury;
- Any incident that meets a regulatory requirement as a Reportable Incident or Reportable Conduct;
- Act of violence or aggression;
- Emergency including fire or evacuation;
- Property damage (estimated over $500);
- Any incident where the police or an ambulance were called;
- Financial loss (over $500);
- Disruption to operations (>2 hours);
- Complaint or allegation of child abuse or conduct suspected to have involved grooming behaviour.

All incidents should be reported within 24 hours of occurring using Employment Hero. An additional *Reportable Incident* form will be completed by the Principal if required.

***NOTE:** the definition of **Incidents (General)** is a SWCC definition to be used for management purposes to assist in mitigating risks, Governing Council reporting and analysing trends overtime. An "incident" can meet the criteria of all three key incident definitions e.g. Incidents (General), Critical Incident and Reportable Incident.*

Reportable incidents as defined by the Non-Government School Regulation guide for the purpose of standard 7 include:

1) The death of a student, staff member or visitor who is at school or during a school related activity or following an incident at school or during a school-related activity.
2) An actual or potential injury, illness or trauma of a student, staff member or visitor who is at school or during a school-related activity or following an incident at school or during a school-related activity and where the incident has resulted or may result in significant impact.
3) An incident requiring a police or other emergency services response when a student appears to have been taken or removed from the school or from a school-related activity without proper authority or goes missing and cannot be accounted for.
4) An incident requiring the school to be locked down or to evacuate staff and students, or reduce the number of students or staff attending, or to close for any duration for health or safety reasons.
5) The receipt of a complaint or allegation of child abuse, including but not limited to sexual abuse, committed against a student by: (a) a staff member or another student; or (b) another person on the school premises or during a school-related activity; whether the abuse is alleged to have occurred recently or in the past.
6) Issuing a formal warning, a suspension or ceasing the employment of a staff member for a breach of the school's Code of Conduct involving suspected grooming behaviour.

Risk The effect of uncertainty on objectives. It is characterised by potential and consequences.

Risk Management is the coordinated activities used to control potential variations to plans to maximise opportunities and minimise loss.

4. Policy

Guidelines

Risk management is the process of planning, organising, leading, and controlling the activities of the College in order to minimise the potential for accidents, and the adverse effect of accidental losses. The process involves the following steps:

1. Risk identification, analysis, and evaluation;
2. Examination of risk treatment and management alternatives;
3. Risk treatment and management strategies;
4. Implementation; and
5. Communication, monitoring, and review.

The defined framework for managing and treating risks includes all aspects of SWCC's functions including Student outcomes, Wellbeing & Safety, Financial, Reputational, Operational, and Strategic.

(*Refer Appendix 1 for Risk Framework which details and defines the following*).

Risk Identification

Risk Identification involves asking the following questions:

- What can go wrong? (risks)
- What would cause it to go wrong? (causes)
- What are the impacts if it goes wrong? (consequences)
- What can go right? (value add – opportunity risk)

Identified risks should be recorded in the Risk Register where they will be monitored and assessed on a regular and ongoing basis by management and the Governing Council.

Risk Analysis

For each Risk identified the existing controls currently in place should be captured. How effective are the controls that are in place? *(Refer Appendix 1 Control Effectiveness Chart)*

Risk is analysed in terms of Consequence (What is the impact of the risk?) and Likelihood (How likely is the risk to occur? – considering the effectiveness of any controls identified.)

Risk Consequences are measured using the following terms:

- Severe;
- Major;
- Moderate;
- Minor;
- Insignificant.

Risk Likelihood is measured using the following terms:

- Likely;
- Possible;
- Unlikely;
- Rare.

Risk Rating Matrix is used to combine the selected level of consequence with selected level of likelihood to determine the overall level of risk. This is called the current assessment (with existing controls).

Risk Evaluation

Risk evaluation involves comparing the current assessment with risk acceptance criteria established based on the Acceptability Chart. The categories of acceptability defined in the Acceptability Chart determine the approach to the management or risk.

Risks rated Low or Medium do not necessarily require further treatment as this level of risk is considered acceptable.

High rated risks require further treatments to reduce their level of risk to a more acceptable level and should be reported through to the Director and Governing Council oversight.

Risk Treatment (including Controls)

Options for Risk Treatment include:

- Share if practical to do so (e.g. outsourcing or insurance);
- Terminate: Cease the activity;
- Accept: Risk acceptance based on the level of risk;
- Reduce: The level of risk by applying additional treatments or controls until the risk is acceptable.

Risk treatment involves a cyclical and ongoing process of:

- Assessing the risk;
- Deciding whether the risk levels are acceptable;
- If not, determine appropriate risk treatment options;
- Implementing risk treatments.

Communication, Monitoring and Review

Communication and consultation with all relevant stakeholders, mainly impacted staff, should take place during all stages of the risk management process.

Monitoring and review should be a part of the risk management process and should take place at relevant intervals, including assessing continuous improvement opportunities, includes regular checks and audits to confirm appropriateness of controls.

Reporting and communication to the Governing Council and distribution to other levels within the organisation are expected on a regular basis.

Incident (General) Management Procedure

In the event of an incident employees must:

- Ensure the immediate safety of students and staff.
- Call 000 if required (Police, Fire, Ambulance).
- Notify relevant people (e.g. family) of those impacted by the incident.
- Complete an Incident Report on Employment Hero within 24 hours. Consider sensitive information and if necessary, leave out names of people involved. If in doubt, refer to the Director or Principal for guidance.
- Does the Incident meet the definition of a Reportable Incident or Reportable Conduct or WorkSafe? If required, Principal or Director will initiate a separate report to the relevant regulatory body (If Reportable, relevant regulatory body may advise additional steps to take or actions.)
- Debrief on Incident and ensure appropriate supports are in place to those impacted including Employee Assistance Program if relevant.
- Review Incident in terms of impact on Risk Register and likelihood of reoccurring. Consider additional controls or mitigants to manage and reduce reoccurrence.

5. Responsibilities

SWCC Governing Body

The Governing Body will:

- approve policies on risk management;
- identify and evaluate the significant risks faced by the College identified in the Risk Register;
- undertake regular reviews of policy and effectiveness of risk management controls;
- set the tone and influence the culture of risk management within the College;
- determining what types of risk are acceptable and which are not;
- set the standards and expectations of staff with respect to conduct;
- determine the appropriate risk appetite or level of exposure for the College;
- approve major decisions affecting SWCC's risk profile or exposure;
- monitor the management of significant risks to reduce the likelihood of unwelcome surprises;
- satisfy itself that the less significant risks are being actively managed.

Executive

The College Executive will:

- lead the identification, assessment, and management of risks in the operation of the College and provide advice and assistance to the College. Matters of student and staff safety are to be prioritised;
- Oversee the communication and implementation of the Colleges risk management policies and procedures.

Principal

The Principal shall:

- oversee and approve/deny planned activities that involve a risk review;
- report to the school's governing body on all activities of significant risk and the management of the risk register.

Employees

- follow the policy and similar policies relating to WHS – ask for assistance if you do not understand the information;
- use appropriate documentation;
- report any hazards, injuries ill health, or variations to the Campus Manager, or Principal;
- work safely to ensure your own safety and health;
- make sure your actions do not cause injury or harm to others;
- take care of any protective clothing and equipment (PPE) in the way you have been instructed and report any concerns about it;
- cooperate with your employer when they require something to be done for safety and health at the workplace.

6. Policy Review Date

30 April 2027

This policy is owned by the Governing Council and is implemented by the Executive. It will be reviewed with a change in legislation or by no later than 3 years after approval by the Governing Council.

Date	New, Material, Minor, Review	Approval
December 2016	New	Governing Council
May 2022	Material	Governing Council
May 2024	Minor	Governing Council

7. Contact SWCC

Web http://www.swcc.wa.edu.au
Email principal@swcc.wa.edu.au
Phone 6724 6971
Bunbury Campus: 56 Wittenoom Street, Bunbury
Busselton Campus: 50 Albert St, Busselton

Appendix 1 – Risk Framework

Consequence Criteria: Indicative terms against which the significance of the risk is evaluated

Rating	Student Outcomes	Wellbeing and Safety	Financial	Reputational	Operational	Strategic
Insignificant	• Educational outcomes, engagement, wellbeing, pathways, and transition can be met.	• Minor injury requiring no first aid or peer support for stress / trauma event	• Small loss that can be absorbed	• Internal impact (no external impact)	• Operations continue with slight interruptions to normal activities	• Goals, targets, and key improvement strategies can be delivered with inconsequential impacts
Minor	• Educational outcomes, engagement, wellbeing, pathways, and transitions achieved but below targets.	• Injury / ill health requiring first aid • Peer support for stress / trauma event	• < 2% deviation from budget • Minor fraud possible	• Adverse comments local community media • Short term stakeholder dissatisfaction / comment	• Some operations disrupted • Minor workarounds return to normal operations	• Minor workarounds need to be implemented to deliver the goals, targets, and key improvement strategies
Moderate	• Overall levels of Literacy and Numeracy static • Increasing absences or non-attendance at school, training, or appointments • Partial achievement of learning or training objectives	• Injury / ill health requiring medical attention • Stress / trauma event requiring professional support	• Loss of assets • 2% - 5% deviation from budget • External audit management letter	• External scrutiny • Adverse state media comment • Stakeholder relationship impacted	• Key operations temporarily disrupted • Leadership team meets to return to normal operations	• Constant consultation with key stakeholders needs to be maintained to deliver the goals, targets, and key improvement strategies
Major	• Improvements not evident • Partial achievement of targeted learning and/or training or engagement objectives • Student dissatisfaction with curriculum, training, or engagements • Decreasing number of students	• Injury / ill health requiring hospital admission • Stress / trauma event requiring ongoing clinical support	• Loss of significant assets • 6% - 15% deviation from budget • External audit qualification on accounts • High end fraud committed	• External investigation • Adverse comments national media • Stakeholder relationship tenuous	• Whole of organisation operations disrupted • External assistance required	• Significant adjustment to resource allocation and service delivery required to deliver goals, targets, and key improvement strategies
Severe	• Literacy and Numeracy decline • Student engagement and connectedness to program and their peers is very poor • Accelerated decline in number of students	• Fatality or permanent disability • Stress / trauma event requiring extensive clinical support for multiple individuals	• Loss of key assets • >15 % deviation from budget • Systemic and high value fraud	• Commission of inquiry • National front-page headlines • Stakeholder relationship irretrievably damaged	• Normal operations cease • Premises evacuated • Significant external assistance required	• Goals, targets, and key improvement strategies cannot be delivered • Changes need to be made to the strategy

Likelihood Criteria: Indicative terms against which the probability of a risk event occurrence is evaluated

Descriptor	Description	Indicative %	Indicative Frequency
Likely	Probably will occur (no surprise)	66-95+%	At least once in the next year
Possible	May occur at some stage	26-65%	Once in the next 3 years
Unlikely	Would be surprising if it occurred	5-25%	Once in the next 5 years
Rare	May never occur	<5%	Once in the next 10 years

1. The **Likelihood Criteria** refers to the likelihood of the consequence descriptor you have selected i.e. the likelihood of a 'major' consequence.
2. The **Indicative Frequency** may not be relevant when assessing risks related to repeated activities, or when objectives are to be delivered over discrete periods of time. It should not be the sole basis for assessment.

Risk Rating Matrix: Used to combine consequence with likelihood to determine the overall level of risk

Risk Rating Matrix		Consequence				
		Insignificant	Minor	Moderate	Major	Severe
	Likely	Medium	Medium	High	High	High
	Possible	Low	Medium	Medium	High	High
	Unlikely	Low	Low	Medium	Medium	High
	Rare	Low	Low	Low	Medium	Medium

Acceptability Chart: Used to decide whether the risk is acceptable of requires further action

High = Tolerable (must have Director support / Board oversight)	Risk should be reduced by developing treatments. It should be subject to on-going review to ensure controls remain effective, and the benefits balanced against the risk. **Escalation of this level of risk to Director level should occur and reported through to the Board**
Medium = Tolerable (with frequent risk owner review)	Exposure to the risk may continue, provided it has been appropriately assessed and has been managed to as low as reasonably practicable. It should be subject to frequent review to ensure the risk analysis remains valid and the controls effective. Treatments to reduce the risk can be considered.
Low = Acceptable (with periodic review)	Exposure to this risk is acceptable, but is subject to periodic review to ensure it does not increase and current control effectiveness does not vary.

Control Effectiveness: Indicates the self-assessment of control effectiveness

Controls Effectiveness Rating and Criteria	
Ineffective	▪ The design of controls overall, is ineffective in addressing key causes and/or consequences. ▪ Documentation and/or communication of the controls does not exist (e.g. policies, procedures, etc.). ▪ The controls are not in operation or have not yet been implemented.
Needs Improvement	▪ The design of controls only partially addresses key causes and/or consequences. ▪ Documentation and/or communication of the controls (e.g. policies, procedures, etc.) are incomplete, unclear, or inconsistent. ▪ The controls are not operating consistently and/or effectively and have not been implemented in full.
Acceptable	▪ The design of controls is largely adequate and effective in addressing key causes and/or consequences. ▪ The controls (e.g. policies, procedures, etc.) have been formally documented but not proactively communicated to relevant stakeholders. ▪ The controls are largely operating in a satisfactory manner and are providing some level of assurance.
Effective	▪ The design of controls is adequate and effective in addressing the key causes and/or consequences. ▪ The controls (e.g. policies, procedures, etc.) have been formally documented and proactively communicated to relevant stakeholders. ▪ The controls overall, are operating effectively so as to manage the risk.