

Document Name and Version	2.4 IICP College's Quality and Governance Framework; (iv) Business Continuity, Resilience & Risk Management
Policy Number	2.4
Policies that Interact with Policy 2.4	Policy 2.1 IICP College's Quality and Governance Framework; (I) Quality Assurance Policy 2.2 IICP College's Quality and Governance Framework; (ii) Governance Policy 2.3 IICP College's Quality and Governance Framework; (Iii) Documented Approach to Quality Assurance
Approval Body	Board
Date of Approval	February 2020
Date Policy Comes into Force	25 th January 2021
Date of Review	2025
Revisions	

1. Preamble.

- 1.1. IICP College is committed to managing risk effectively in order to make the College more secure, and to give learners and other stakeholders confidence in the College. Risks threaten the ability of the College to achieve its strategic objectives and to deliver on its obligations, but effective risk management reduces exposure and facilitates planning for business continuity and recovery. The College takes a holistic approach to managing risk, through identifying potential threats and the potential impacts of those threats, and also through building organizational resilience.
- 1.2. In order to achieve its aims, this policy focuses on both risks and resilience. It combines the identification of strengths that foster organisational resilience; the identification of risks that threaten organisational sustainability; and the documentation and management of risks.
- 1.3. The College aims to increase its resistance to, and resilience in the face of, events that could negatively impact on the continuity of its service provision, or the achievement of its strategic goals. Resilience is fostered in IICP College through the alignment of strategy, management systems, governance structure, and decision-making processes so that it can be mindful of and adjust to continually changing risks.
- 1.4. This policy addresses Risk Management and Business Continuity Management.
 - 1.4.1. Risk Management is the development, implementation and maintenance of policies and procedures to assist the College to identify and manage potential risks and threats. The College is committed to ensuring that risk management is effective and proportionate and is seen as the concern of everyone. IICP College establishes risk management both as part of normal day to day business and also as informing the strategic and operational planning and performance cycle.
 - 1.4.2. Business Continuity Management is the process of creating systems of recovery to permit ongoing operation, before and during the occurrence of a significant event. Business continuity processes increase the capacity of the College to endure and adapt to changes, with minimal impact on service delivery and strategic goals.

1.5. This policy should be read in conjunction with:

1.5.1. IICP College Risk Appetite Table;

1.5.2. IICP College Risk Register (Academic and Organisational parts);

1.5.3. Other IICP College policies and procedures relating to specialised risk areas, including Data Protection Policies and Health and Safety Policy.

2. Purpose.

2.1. The purposes of this policy are:

2.1.1. To ensure a consistent approach to the application of risk assessment and management;

2.1.2. To create and maintain a culture of risk awareness;

2.1.3. To promote a risk aware organisation through risk assessment and proactive risk management across all services;

2.1.4. To support organisational resilience in the face of disruptive events;

2.1.5. To support and guide staff in the management of disruptive events.

3. Scope.

3.1. The QA governance system applies to all corporate, academic and other boards and committees in IICP College, and members thereof as well as learners and employees of IICP College.

4. Roles and responsibilities.

4.1. **The Board of Directors (“Board”)** oversees and monitors the assessment and management of risk across the College, including financial, compliance and reputational risk.

4.2. **The Academic Council** oversees and monitors the assessment and management of academic risk. The Academic Council is responsible for reporting any risk to the Board.

4.3. **The Senior Management Team** are responsible for:

- 4.3.1. Developing the Organisational and Academic Risk Registers;
- 4.3.2. Monitoring, reviewing and updating the Risk Registers and Risk Appetite Register;
- 4.3.3. Submission of the Risk Registers to the Board and Academic Council;
- 4.3.4. Providing updates as appropriate;
- 4.3.5. Advising the Board on:
 - 4.3.5.1. The adequacy of measures to improve the internal controls framework to ensure mitigation of risk, and accuracy of reporting;
 - 4.3.5.2. The adequacy of the framework in place to ensure that risks are effectively identified and managed across the College;
 - 4.3.5.3. The adequacy of measures to ensure compliance by the College with relevant legislation and regulations.

4.4. **Managers** are responsible and accountable for:

- 4.4.1. Ensuring operational risks in their areas of responsibility are identified;
- 4.4.2. The day-to-day management of risk in their areas of responsibility;
- 4.4.3. The implementation of risk management within their area of responsibility including allocation of appropriate resources.

4.5. The **Quality Assurance Manager** is responsible for ensuring the effective management of data in order to ensure compliance with legislative and regulatory requirements, and to protect the information assets managed by the College. The QA manager also provides support and consultation regarding the maintenance of the Risk Registers.

4.6. The **Health and Safety officer** is responsible for managing the risk procedure in relation to Health and Safety issues, in accordance with IICP College's Health and Safety Policy.

4.7. The **Quality Assurance Manager** is responsible for:

- 4.7.1. Developing, reviewing and updating the Business Continuity, Resilience and Risk Management and related Policies and Procedures.

4.7.2. Assisting as appropriate with the development, monitoring and review of the Risk Register and Appetite Register. This may include assisting staff with the risk management process.

4.8. **All staff** are responsible for:

4.8.1. Ensuring that they are aware of and comply with all applicable IICP College and related policies, procedures and manuals;

4.8.2. Reporting all identified operational risks and incidents in accordance with the Risk Management and related Procedures (such as Data Protection incidents);

4.8.3. Assisting with risk analysis and implementation of risk treatment plans as required;

4.8.4. Adopting a risk management culture in daily activities.

5. Policy.

5.1. Risk Management is incorporated into all areas of the College's operations and is the responsibility of all staff. Whilst specific staff may have explicit risk management roles and tasks, all staff are expected to be proactive in risk management.

5.2. Risk management is integrated by all staff into IICP College culture, including strategic planning, operational policy and procedures, project management, and day-to-day education and engagement activities.

5.3. Significant risks, including emerging risks, are regularly identified, assessed, recorded in a prescribed Risk Register, reviewed and updated.

5.4. The objective of risk assessment is to reduce and/or eliminate the consequence of a risk being realised, and thereby reducing harm, loss or disruption to services. Not all risks can be eliminated. However, identifying and reducing risk is sound business and education practice, and offers protection to learners and the College.

5.5. Since not all risks can be eliminated, and some risk events are outside of the control of the College, procedures are required to assist the College manage disruptive

events. Business Continuity Management procedures assists with the management of risks to protect the health and wellbeing of the College community, and to ensure, in so far as is possible, that the College can continue operating with minimal disruption. This will enable, where possible, service delivery to continue during and beyond a critical or significant event.

5.6. IICP College holds a Risk Register, one part of which covers Academic Matters and one part of which covers Organisational matters. Oversight of Organisational Risk is the responsibility of the Board. Oversight of the Academic Risk is the responsibility of the Academic Council.

5.7. No organisation can achieve its objectives without taking risks. Therefore, the College identifies the risk are considered acceptable in the pursuit of its long-term objectives. This is identified in IICP College's Risk Appetite Table.

5.8. This policy outlines the IICP College Risk Assessment and Business Continuity Policy and Procedures. These procedures will need to be adapted to particular consequences and situations. Modifications of the individual actions and internal processes should occur in response to risks as they arise in context, and reported accordingly.

6. Corporate Governance and Risk Management.

6.1. Corporate governance refers to the processes and structures by which the College is directed and managed (Policy 2.2). This policy sets out the means by which IICP College's governance structures manage and respond to risk, foster the College's resilience and enhance corporate performance and accountability, while taking into account the interest of stakeholders.

6.2. The College Risk Registers are prepared annually by the Senior Management Team. These registers are prepared in consultation with all managers in relation to their area of operation. They identify and document current and emerging risks which may

impact upon the College, in accordance with the Risk Management Procedure (section 6).

6.3. The Senior Management Team present the draft Registers to the Board (Organisational Register) and Academic Council (Academic Register) on an annual basis, along with the Risk Appetite Register.

6.4. Where significant risks emerge outside of this annual review, the Senior Management Team update the Board and/or Academic Council.

7. Risk Assessment Procedure.

7.1. Risk management is about taking the appropriate actions to ensure continuity of service provision, and also that a service achieves its objectives. Risk management procedures assists those identifying and managing risk to focus on key risks rather than all risks within the service. The outcome of this process is documented in the relevant Risk Register and monitored and reviewed by the relevant manager and the Senior Management Team.

7.2. The IICP College *Risk Assessment Procedure* consists of the following steps:

- Identify;
- Analyse;
- Treat;
- Monitor; and
- Report.

7.3. Identify Risks:

- This involves identifying potential risk events, which may occur at any level of the College's operations.
- The following should be noted in the Risk Register:
 - **Risk Area** – brief description of the area of operation in which the risk occurs;

- **Risk Owner** – the person who is responsible for the risk and ensures that the risk is effectively managed.

• **The Main Types of Risk are as follows:**

Risk Category	Description	Example
Strategic Risk	This is the risk that the College's strategy becomes less effective and the College struggles to reach its goals as a result. It could be due to technological changes, changes in demand for programmes, increased costs, or socio-economic changes impacting on Counselling and Psychotherapy training.	Technological developments have brought significant changes to programme design and delivery. Failure to consider blended and online programmes and modes of delivery could provide a threat to the College achieving its strategic goals.
Compliance Risk	This is the risk that the College is not complying with all the applicable laws and regulations. As laws change all the time, there is always a risk that future regulations will not be identified, and that compliance is not ensured before regulations are implemented.	Statutory regulation of Counselling and Psychotherapy will introduce new regulations governing programme accreditation and professional recognition. Failure to anticipate and attend to these requirements, and to achieve early accreditation with CORU, could result in College programmes becoming significantly less attractive to prospective learners.
Operational Risk	Operational risk refers to an unexpected failure in the College's day-to-day operations. It could be a technical failure, such as a server outage, or a failure of processes, such as responding to a data access request. Operational risk can also be caused by environmental events, such as extreme weather.	A severe weather event poses a risk to the safe and effective delivery of programmes. This could impact on the College's ability to deliver its scheduled programmes and assessments.
Financial Risk	Financial risk refers specifically to the money flowing in and out of the College. Financial risk includes the possibility of a sudden financial loss, or ongoing financial loss that is unmanaged.	Failure of a significant proportion of learners to pay fees on time or at all can pose a risk to the financial standing of the College.
Reputational Risk	Reputational risk refers to the potential for negative publicity, public perception	Negative publicity arising from social media reporting of activities could

	or uncontrollable events to have an adverse impact on the College's reputation. Any damage to the reputation of the College could result in a decrease in learner numbers, and a difficulty in retaining faculty and staff. Damage to reputation may also affect accreditation status.	result in damage to the reputation of the College, and its programmes becoming less attractive to prospective learners.
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7.4. Analyse Risks:

- This involves describing the risk (the event, its potential impact and its likelihood) and its management (what has been done and what needs to be done).
- The following should be noted in the Risk Register:
 - **Impacts** – consequences or outcomes that the College can expect if the risk eventuates;
 - The **likelihood** of the risk.

7.4.1. The impact of a risk is categorised as follows:

Impact Category	Description	Example
Minor	Little or no disruption to services; No damage to reputation; Little or no financial risk; Little or no effect on achieving organisations objectives.	A data breach occurs. Sensitive personal data is not affected.
Moderate	Some disruption to services; Some damage to reputation; Some or no financial risk; Some or no effect on achieving organisations objectives.	New regulations require immediate modification of a programme, causing disruption to revalidation schedule.
Severe	Substantial or severe disruption to services; Substantial or severe damage to reputation; Substantial or severe financial risk;	A severe weather event results in the closure of the College for a number of weeks.

	Substantial or severe effect on achieving organisations objectives.	
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7.4.2. The likelihood of the risk describes the chance that the risk will occur;

- This describes the number of times within a specified period in which a risk may occur. Factors that may influence this include (i) Anticipated frequency of occurrence; (ii) The external environment (e.g. regulatory, economic, community); (iii) The procedures, tools and skills currently in place; and (iv) History of previous events, locally, nationally and globally.
- Likelihood can be classified as follows:

Rating	Description	Occurrence	Example
Almost Certain	Expected to occur in most circumstances	Multiple / 12 month	A minor data breach occurs
Likely	Will probably occur in most circumstances	Once / 12 month	Regulators will introduce new, unpredictable requirements
Possible	Might occur within a 5-year time period	Once / 12 months – 5 year	Statutory regulation will be introduced, which change recognition requirements for the profession
Unlikely	Could occur during a specified time period	Once / 5 –10 years	Re-validation may not be granted for a programme by QQI
Rare	May only occur in exceptional circumstances	Once / > 10 years	A natural disaster may impact on IICP College premises

7.5. Treat Risks:

- This involves implementing a response in order to prevent and/or mitigate the risk.
- The following should be noted in the Risk Register:
 - **Current treatments** – the actions currently being taken to mitigate risk;

- **Future Treatments** – specific actions that will further prevent and/or mitigate the risk event.

7.6. Monitor Risks:

- This involves continually monitoring and evaluating the risks and treatments in order to maintain the effectiveness and appropriateness of the Risk Management.
- The Risk Owner, in consultation as appropriate, will need to review the:
 - ❖ Risk event causes and impacts;
 - ❖ Existing and future treatments (including the resolution/review dates) in order to determine whether further treatments are required.

7.7. Report Risks:

- This involves providing reports and updates in order to assure the College and key stakeholders that risks are being appropriately managed and treated.
- The frequency and method of reporting may vary and should reflect the significance of the risk.

8. Business Continuity Management Procedures:

8.1. The College has in place a variety of strategies, processes and plans that facilitate the continuance or resumption of its services and its recover after a disruptive event.

These include:

- *Protection of Enrolled Learners (PEL) scheme.*
- *Insurance Strategy:* Insurance is a means of transferring risk. The College's insurance program is reviewed on an annual basis, taking into account the risk profile, the prevailing status of the insurance market and the College's risk appetite at the time.
- *Adverse Event Continuity and Recovery Planning* processes maintain plans to provide effective response in the event of a significant safety, technology,

or environmental incident. Such plans provide for expedient response to protect the safety and well-being of personnel, the protection of the College's assets, and strategies for recovery from unwanted events and minimising disruption to operations.

- *IT – Resilience and Disaster Recovery Planning.* A primary objective in developing this policy is to ensure the resilience of ICT infrastructure and support systems. An ICT Disaster Recovery Plan will be developed and maintained to ensure the continuity of ICT systems availability and protection of data in the event of a disruptive event.

9. Supporting Documentation:

9.1. Risk Assessment

9.1.1. Risk Appetite Table

Material risk category	Risk appetite level	Statement of Enterprise Risk
Strategic Risk	Moderate	For risk in areas related to strategic initiatives for which the potential return justifies the risk. This level enables the College to remain responsive to emerging opportunities.
Operational Risk	Moderate	For all operational risks other than those for which an appetite is separately defined in this document.
Compliance Risk	Zero (current regulations) Moderate (future regulations)	For knowingly breaching legislation, regulatory requirements and codes of practice under which the College has obligations. For developing programmes, processes and practices that may not be compliant with future legislation and regulation, where the benefit or potential benefit justifies the risk. This level enables the College to remain responsive to emerging opportunities in the context of regulatory change.
Financial risk	Moderate	This allows for the development of new projects, processes and systems. This allows for flexible payment options to be provided to learners.

Reputational risk	Moderate	This allows for robust institutional, professional and academic policies and procedures.
Fraud	Zero	
Safety.	Zero	For risks to the safety of all people to whom the College has a duty of care

9.1.2. Risk Register (Academic and Organisational)

		Measuring Risk			Managing Risk		Reviewing Risk	
Risk Area (Date)	Risk Owner	Outline of Risk	Impact	Likelihood	Current tools in use to mitigate risk	Further actions required if any Including date for review	Review date	Review Outcome

9.2. Business Continuity processes

9.2.1. Adverse Weather: IICP Emergency Closure Process

Process Steps / Responsibilities

	Process Step	Responsible	Notes
Decision making	Decision made to open/close college	SMT	
	Communication with Partas	SMT	
Staff Notification	Check staff schedule Phone and/or text scheduled staff	DOR	
Lecturer and Learner Notification	Text messages	DOR	Use www.sendmode.com/ Log in details below.
	Emails	DOR	
	Website Update	DOR	Template for Storm Ophelia is saved in the website for future use.

UPDATING THE SEND MODE SYSTEM

1. Staff will update the learner lists with each new course intake. This should be done a few weeks after the start date of the intake.
2. Ongoing update of the learners on the system based on withdrawals/deferrals or new joiners is needed. This can be done as part of the deferral/withdrawal process and as part of the registration process for new joiners. AM will action this.

3. The learner lists should be cross-checked periodically against our course accounts to ensure accuracy and no learner additions/deletions have been missed. This should be done every two months and could be done by a member of the admin team.
4. In addition to the learner groups, there is one Lecturers and TAs group. This contains phone numbers of all our paid and unpaid lecturers / TA's

NOTE: There is a procedure document outlining how to add contacts to SendMode. This can be found here: J:\EMERGENCY CLOSURE\How to update send mode via bulk import - 06.02.2018.docx

TEMPLATE TEXT AND EMAILS

Text Templates

160 characters = 1 credit / 306 characters = 2 credits

CLOSURE (160 characters)

Dear Students, please note IICP will be closed tomorrow, Sunday 10 Dec on account of the snow and all classes are cancelled. Visit iicp.ie for more information.

OPEN (156 characters)

Dear Students, please note IICP will re-open tomorrow, Monday 11 Dec for classes as usual. Only travel if safe to do so. Visit iicp.ie for more information.

Email Templates

CLOSURE

Dear Students,

We regret to inform you that IICP will be closed tomorrow, [day, date] on account of the [snow/storm/etc.] and all classes are cancelled. Once the college re-opens, we will work on rescheduling the missed classes and will communicate revised dates with you. We hope that you stay safe and look forward to seeing you next week.

Best regards,

IICP

OPEN

Dear Students,

We hope you are safe and sound with no adverse effects from [snow/storm]. In line with many other third level institutions, IICP will be re-open tomorrow, [day, date] for classes as usual.

Needless to say, if where you are living is affected by the [snow/storm], or your travel route is in any way affected, or may be affected, please do not travel. You must decide what is in your own best interests. The most important thing is that you and those dear to you are safe and well.

If we don't see you tomorrow, we look forward to seeing you next week.

Best regards,