

Risk Management Policy and Procedures

POLICY CODE: QA4.3

Related Outcome Standard: 4.3

NATIONAL CODE OF PRACTICE FOR PROVIDERS OF EDUCATION AND TRAINING TO OVERSEAS STUDENTS 2018 (CTH).

STANDARD 5 AND 6

Purpose

The purpose of this policy is to ensure Cornell Institute of Training identifies, assesses, mitigates, and reviews risks that may affect the safety, wellbeing, and operations of its VET students, staff, and business. It provides a framework for financial oversight, child safety, and the management of conflicts of interest to support ongoing compliance and sustainability.

Legislative Background

Outcome 4 –Governance, Division 2 – Risk Management, Standard 4.3, National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025 (Cth).

National Vocational Education and Training Regulator Act 2011 (Cth).

Work Health Safety Act and Regulations

Financial Viability Risk Assessment Requirements, under section 158 of the National Vocational Education and Training Regulator Act 2011 (Cth).

National code of practice for providers of education and training to overseas students 2018 (cth). Standard 5 and 6.

Scope

This policy applies to:

- All governing persons of Cornell Institute of Training
- Executive Management
- Staff members
- Third-party providers engaged by Cornell Institute of Training for delivery of any services.

Policy Statement

Cornell Institute of Training is committed to maintaining a robust risk management framework that protects the safety, wellbeing, and interests of its VET students, staff, and the organisation as a whole. Risk management is embedded into strategic, operational, and financial decision-making and aligned with regulatory obligations.

Work Health Safety Act and Regulations require Cornell Institute of Training to provide information, training, and instruction to a worker regarding the nature of work, the risk associated, and the control measures implemented.

Cornell Institute of Training is committed to ensuring the health, safety, and wellbeing of all persons involved in its training and assessment activities. This commitment extends to providing a safe and supportive environment for students, staff, contractors, and visitors, in accordance with the applicable **Work Health and Safety (WHS)** laws of each Australian jurisdiction in which Cornell Institute of Training operate.

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We recognise that WHS obligations vary between states and territories. As such, Cornell Institute of Training adopts a flexible but compliant approach to risk management that meets or exceeds the legal requirements of the relevant WHS legislation, including the harmonised *Work Health and Safety Act 2011* (Cwth) and state-based laws such as the *Occupational Health and Safety Act 2004* (Vic).

All stakeholders have a legal and moral duty to:

- Take reasonable care of their own health and safety;
- Not endanger others by their actions or omissions;
- Comply with all health and safety instructions, training, and procedures;
- Promptly report any hazards, near misses, or incidents.

Failure to comply with these duties may result in disciplinary action, civil penalties, or both.

Procedures

Work Health and Safety

Identification of Applicable Legislation

At induction and during policy reviews, Cornell Institute of Training will confirm the applicable WHS legislation based on the delivery location.

A legislative reference table is maintained and reviewed annually (see Section 5.1 of this policy).

Risk and Hazard Identification

Managers and trainers are responsible for regularly inspecting physical and virtual learning environments to identify WHS risks.

Students and staff are encouraged to report all hazards or unsafe practices via the CIT's incident reporting form.

Risk Assessment and Control

Identified hazards are assessed using a risk matrix to determine the severity and likelihood of harm.

Cornell Institute of Training implements control measures according to the hierarchy of control:

- Elimination
- Substitution
- Isolation
- Engineering
- Administrative
- Personal Protective Equipment (PPE)

Implementation of Controls

Risk control measures are documented in the Risk Register.

Managers are responsible for ensuring controls are implemented, communicated, and monitored.

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Staff training is provided where control measures affect daily operations.

Monitoring and Review

WHS controls are reviewed annually or immediately after a serious incident.

Internal audits are conducted to assess WHS compliance and update the risk profile.

Feedback from students and staff is reviewed at quarterly meetings.

Jurisdictional Compliance

Cornell Institute of Training ensures all WHS documentation, training, and processes reflect local legislation. This includes:

Adopting model WHS principles in Cwth, NSW, QLD, SA, TAS, ACT, and NT.

Ensuring compliance with the *Occupational Health and Safety Act 2004* in Victoria.

Risk Identification and Management

- Cornell Institute of Training maintains a Risk Register identifying risks across operational, financial, academic, reputational, and compliance domains.
- Each risk is assessed using a defined matrix (likelihood and impact) and assigned mitigation strategies.
- Risks are reviewed quarterly and escalated to governing persons when rated as high or critical.
- Staff are trained in risk awareness and encouraged to report emerging issues using the Incident and Risk Report Form.

Financial Oversight

Cornell Institute of Training is committed to ensuring the ongoing financial viability of its operations as a critical component of quality governance, risk management, and long-term sustainability. The organisation will monitor financial viability at least quarterly, reviewing financial performance against recognised indicators of commercial stability.

- **Key indicators of financial viability include:**
 - **Liquidity:** Assessment of current ratio and cash flow to ensure sufficient short-term assets to meet liabilities.
 - **Solvency:** Evaluation of long-term financial stability through debt-to-asset and debt-to-equity ratios.
 - **Economic Dependency:** Identification of risks associated with over-reliance on single revenue streams (e.g., government subsidies or international student tuition).
 - **Profitability & Revenue Flow:** Analysis of net profit margins, revenue trends, and forecasted cash inflows.
 - **Commercial Risk:** Evaluation of external market risks and operational exposure.
 - **Audit Opinion:** Consideration of independent financial audits, where applicable.
 - **Statutory Compliance:** Timely compliance with obligations under taxation law, superannuation, GST, ASIC/Companies Code, and other financial legislation.
 - **Accounting Standards:** Application of relevant accounting standards and transparent financial reporting.
 - **Contingent Liabilities:** Monitoring potential future obligations (e.g., refunds, claims, unresolved legal disputes).

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- **Governance Oversight:**

- Financial performance is reviewed by management at scheduled governance meetings.
- Variances or risks are discussed, and corrective actions are implemented promptly.
- The CEO or delegated officer ensures financial policies are up to date and that accounting systems provide accurate and timely reporting.

- **Regulatory Engagement:**

- In the event ASQA initiates a **Financial Viability Risk Assessment (FVRA)** or requests financial information, Cornell Institute of Training will cooperate fully and provide accurate documentation, including independent accountant reports if required.

Conflict of Interest

- All staff and governing persons must declare potential or actual conflicts of interest:
 - On appointment.
 - Annually through the Conflict-of-Interest Declaration.
 - Immediately when a new situation arises.
- Conflicts are assessed and managed through disclosure, oversight, or role reassignment.
- Records are maintained in the Conflict-of-Interest Register, and non-disclosure is treated as a misconduct matter.

Child Safety (For VET students under 18 years of age)

- If training is offered to students under 18, Cornell Institute of Training applies the National Principles for Child Safe Organisations, including:
 - Child safety risk assessment of training content and delivery modes.
 - Supervision requirements for face-to-face, online, and offsite training.
 - Staff working with minors must hold a valid Working with Children Check (WWCC) or equivalent clearance. The records of the same are maintained in the Working with Children Check Register.
 - Staff induction includes child protection obligations.
 - A Child Safety Code of Conduct and Safeguarding Policy is implemented and monitored.

Responsibilities

CEO: Ensures organisation-wide risk management and financial oversight, Maintains Risk Register and Conflict of Interest Register.

Governing Persons: Review strategic risk and financial reports; support child-safe and ethical culture

Compliance and Training Manager: Coordinate Risk Assessment checks, monitor regulatory risks and complete ASQA reporting.

Accountant/ Financial Advisor: Prepares financial reports and supports financial viability compliance

All staff: Report risks, disclose conflicts, and follow safeguarding practices

Third-Party Providers (if relevant): Comply with agreement terms, attend briefings, cooperate with risk assessments.

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Supporting Documents

- Risk Register
- Quality Assurance Calendar
- Incident and Risk Report Form.
- Financial Committee Meeting Minutes Template
- Financial Risk Assessment and Management Plan
- Child Safety Code of Conduct (if relevant)
- Working with Children Check Register (if relevant)

Related Policies

- QA 3.1 VET Workforce Management Policy and Procedures
- Q 4.1 and 4.2 Governance and Accountability Policy and Procedures
- QA 4.4 Continuous Improvement Policy and Procedures
- CR 2.9 – 2.11 AQF Certification Documentation and Records Policy and Procedures
- Staff Code of Conduct Policy and Procedures

Operational Procedure Table: Governance and Accountability

Action	Responsible Staff	Supporting Document	Timing/Frequency	Compliance Mapping (Standard 4.3)
Identify and record operational and compliance risks	CEO	Risk Register	Quarterly or as triggered	4.3(a) – Systematic risk identification across all business functions
Review and escalate high-risk issues	Compliance and Training Manager, CEO / Governing Persons	Risk Register, Board Reports	Quarterly board meetings	4.3(b) – Oversight of significant risks and mitigation actions
Review of financial performance, cash flow, and viability	Accountant/ Financial Advisor / CEO	Financial Reports, Cash Flow Statements	Monthly	4.3(c) – Ongoing financial health monitoring and viability risk control
Submit FVRA documentation to regulator (as required)	CEO / Accountant/ Financial Advisor	FVRA Template	On request / annual as required	4.3(c) – Compliance with financial viability obligations under s158
Distribute and collect Conflict of Interest Declarations	CEO	Conflict of Interest Declaration	On appointment and annually	4.3(d) – Declaration of real/apparent conflicts of interest
Review and manage declared conflicts	CEO / Governance Chair	Conflict of Interest Register	As declared	4.3(d) – Conflict transparency and mitigation ensures governance integrity

Conduct child safety risk assessment for U18 learners	Compliance and Training Manager	Child Safety Risk Assessment Template	Before delivery begins	4.3(e) – Risk mitigation aligned with National Principles for Child Safe Organisations
Verify WWCCs for staff working with U18s	Compliance and Training Manager	WWCC Register	Prior to engagement; annually	4.3(e) – Ensures child-safe workforce compliance and tracking

Document Control

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