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|  | Document Name | <b>Risk Management Policy</b>                                                      |
|                                                                                   | Document No.  | <b>FM-53</b>                                                                       |
|                                                                                   | Reviewed by   | <b>Systems Manager</b> on 05/11/2025                                               |
|                                                                                   | Authorised by | <b>CEO</b> on 08/11/2025                                                           |
|                                                                                   | Comment       | It is the responsibility of the recipient to identify/control superseded documents |

## INTRODUCTION

### Purpose

GEM College applies a systematic and proportionate approach to identifying, assessing and managing risks that may affect VET students, staff, the organisation or the quality and continuity of its services. Risk management supports informed decision-making, regulatory compliance and continuous improvement.

### Scope

This policy applies to all GEM College operations, services, staff, contractors, governing persons and third-party arrangements. It includes strategic, educational, financial, operational, legal, regulatory, safety, information-security, reputational and child-safety risks.

### Regulatory framework

This policy supports the risk-management requirements in Standard 4.3 of the National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025. It also supports the governance, third-party oversight and continuous-improvement requirements in Standards 4.1, 4.2 and 4.4.

The operational requirements for assessing, recording, escalating, treating and reviewing risks are set out in GEM College's Risk Management Process.

## DISCUSSION

### 1. Risk management principles

Risk management forms part of GEM College's governance, planning, decision-making and continuous-improvement arrangements. Risks must be managed consistently, based on reliable information and in proportion to their likelihood and potential consequences.

GEM College will:

- Consider both existing and emerging risks;
- Give priority to the safety, wellbeing and educational interests of VET students;
- Assign responsibility for each material risk;
- Apply controls proportionate to the level of risk;
- Escalate risks that exceed delegated authority or accepted tolerance; and
- Review whether controls remain effective.

## 2. Risk identification and assessment

Risks must be identified and assessed when planning or changing services, entering contractual or third-party arrangements, introducing new training products or delivery methods, responding to incidents or non-compliance, and whenever changing circumstances may affect students, staff or GEM College.

Each identified risk must be assessed by considering its likelihood, consequences, existing controls and the level of residual risk. Material risks must be recorded in the applicable risk register in accordance with the Risk Management Process.

## 3. Risk treatment and escalation

Risk treatments must identify the action required, the responsible person and the required completion or review date. Treatments must be proportionate to the risk and must not compromise student safety, training quality or regulatory compliance.

Risks must be escalated where they:

- Present a serious or immediate threat to students, staff or the organisation;
- May cause significant regulatory, financial or operational consequences;
- Cannot be adequately controlled within the responsible person's authority;
- Remain outside the approved level of risk following treatment; or
- Require a decision or resources from governing persons.

## 4. Required areas of risk oversight

Risk treatments must identify the action required, the responsible person and the required completion or review date. Treatments must be proportionate to the risk and must not compromise student safety, training quality or regulatory compliance.

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- Require a decision or resources from governing persons.

## 5. Financial risk and conflicts of interest

GEM College's governing persons must receive sufficient, reliable and timely information to understand and oversee the organisation's financial position, performance and cash flow. Financial risks must be monitored in conjunction with applicable financial-viability requirements.

Real, apparent and potential conflicts of interest must be disclosed, recorded, assessed and managed. A person must not participate in a decision where an unmanaged conflict may compromise, or reasonably appear to compromise, impartial decision-making.

## 6. Students aged under 18

Where GEM College provides training or assessment to students aged under 18, risks to their safety and wellbeing must be identified and managed with regard to the training content, delivery

environment and mode of delivery. Relevant controls must be consistent with the National Principles for Child Safe Organisations, as required by Standard 4.3 of the Outcome Standards.

## **7. Responsibilities**

Governing persons are accountable for overseeing material risks, financial viability and the effectiveness of GEM College's risk-management arrangements.

Managers are responsible for identifying and managing risks within their areas of responsibility, maintaining required records, escalating material risks and monitoring agreed treatments.

Staff, contractors and third parties must comply with applicable controls and promptly report hazards, incidents, emerging risks, control failures and conflicts of interest.

A person may accept a risk only within their documented authority. Material risks and risks outside approved tolerance must be referred to the appropriate governing person.

## **8. Monitoring, reporting and records**

Material risks, controls and treatments must be documented and reviewed at intervals proportionate to the risk. Reviews must also occur following significant change, an incident, identified non-compliance or evidence that a control may no longer be effective.

Governing persons must receive information about material risks, overdue treatments, significant incidents and changes to the organisation's risk profile. Risk records must be retained in accordance with GEM College's records-management requirements.

## **9. Continuous improvement**

Risk information must be considered when GEM College monitors and evaluates its performance. Incidents, complaints, feedback, audit findings, regulatory information and the outcomes of risk reviews must inform corrective action and continuous improvement, as set out in Standard 4.4 of the Outcome Standards.

## **10. Privacy complaints**

A person who believes GEM College has not complied with this policy, the Privacy Act or the Australian Privacy Principles may submit a complaint using the contact details below.

GEM College will acknowledge the complaint, investigate it and provide a written response within a reasonable period, normally within 30 days. If the complaint is not resolved, the person may complain to the Office of the Australian Information Commissioner.

## SUMMARY

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Chief Executive Officer - Monique McCloskey