BWYQ Risk and Issue Management Policy

Introduction

The risks that British Wheel of Yoga Qualifications (BWYQ) face are continually changing. Staff should proactively identify and manage risks so that BWYQ can keep overall risk capacity at an appropriate level.

The regulatory authorities require anyone working for or on behalf of BWYQ, or its recognised Centres, to take all reasonable steps to identify the risks that could have an 'adverse effect' (Ofqual General Conditions of Recognition; GCOR- A6)

'Adverse Effect' is defined as, *An act, omission, event, incident, or circumstance has an Adverse Effect if it –*

1. *(a) gives rise to prejudice to Learners or potential Learners, or*
2. *(b) adversely affects –*
   1. *(i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in a way that complies with its Conditions of Recognition,*
   2. *(ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or*
   3. *(iii) public confidence in qualifications. (Ofqual Handbook, J1.8)*

BWYQ uses a system of internal reporting logs that are managed and maintained by BWYQ staff. BWYQ also has a separate reporting log for suspected Malpractice and Maladministration (see BWYQ 0017 Malpractice and Maladministration Policy).

This Risk and Issue Management Policy outlines the principles and strategy associated with BWYQ's risk and issue management approach. It;

- Covers aspects of the Awarding Organisation (AO) functions as related to risk management
- Outlines how risks and issues will be recorded, communicated, reviewed, managed and escalated
- Confirms responsibilities within BWYQ for identifying and managing risks and issues
- Assists staff in making informed decisions when responding to identified risks and issues
- Describes risk and issue categories, assessment criteria and matrices used to categorise and manage risks and issues
- Helps to ensure that BWYQ implements a successful risk and issue management culture

Review Arrangements

The BWYQ Chair and Trustee-Directors have responsibility for this policy ensuring that it is reviewed regularly within the usual review cycle and in response to operational feedback.

Definition of Risk Management

'Risk management" incorporates all the activities required in identifying and controlling risks which may affect BWYQ business objectives; including the successful and compliant operation of the Awarding Organisation and delivery of the regulated qualifications by recognised Centres.

It is important to note that risks relate to events that **have not occurred**. If they have happened they become issues.

Definition of Issue Management

'Issue management" incorporates all the activities involved in identifying and controlling anything that impacts upon the ability to achieve the business objectives of BWYQ **now**; events and developments that **have occurred** and need to be dealt with and resolved.

Issues can influence existing risks and create new ones, so the BWYQ Risk Management Log should be examined alongside any issues.

Overview

As an organisation that keeps all aspects of its business under review, BWYQ monitors and reviews specific and overall issues and identifies risks to be recorded in the BWYQ Risk Management Log. Risks and issues identified by those working for or on behalf of BWYQ are fed to the BWYQ Operations Coordinator, who ensures that these are entered into the BWYQ Risk Management Log.   This log is maintained by the BWYQ Operations Coordinator and shared with the BWYQ Chair/Responsible Officer. It is stored electronically on an external device, within an encrypted vault. The device is then stored securely in a locked container. A back-up is stored in the same way at a separate location.   When it is necessary, data is transferred securely.

A specific Centre-based Risk Log is produced from the overall Risk Management Log so that the identified risks, evaluations and actions to prevent or mitigate Centre-based risks can be discussed with the Centre(s). BWYQ Centres should report any potential or actual medium or high-level risks immediately to the BWYQ Operations Coordinator who will advise or refer the issue on, as appropriate.

The BWYQ Operations Coordinator escalates all 'amber', 'amber-red' or 'red' status risks or issues to the BWYQ Chair, who has the discretion to share relevant risks or issues with the parent organisation, British Wheel of Yoga.

If a medium, high or very high risk or issue changes, or new ones emerge, at any stage, this change must be communicated to the BWYQ Chair.

BWYQ aims to develop a continuous cycle of effective risk and issue management. Risks are reviewed and updated as part of the BWYQ Self-Assessment and Statement of Compliance process, and live issues/risks carry over into the next year's logs. All issues/risks that have been closed are archived.

Risk and Issue Principles

The BWYQ approach to identifying and managing risks and issues adheres to the following principles:

- Everyone must commit to risk and issue management and be proactive in the identification and management of risks that may affect BWYQ effectiveness, regulatory compliance and/or reputation.
- BWYQ will operate a blame-free culture in relation to the identification of risks, so staff will not be criticised or blamed for having a number of risks within their area of operation/responsibility.
- Identifying risks is a sign of effective risk management, whilst issue management professionally and effectively deals with events or developments that impact on BWYQ's operational effectiveness. Therefore, staff and trustee-directors must be open and honest about the nature of risks and issues and not try to hide or present them in a better light.
- Aim to identify and deal with risks and issues sooner rather than later. They should also be dealt with at the lowest appropriate level, where possible, rather than escalating them.
- Risk judgments depend on sound information and a wide understanding of diverse risks and issues. Where individuals lack experience in certain fields they may need to consult with others who have the relevant experience/expertise, and work jointly to manage a risk or issue.
- Action to manage and address risks and issues should be relevant and proportionate

Risk and Issue Categories

Risks and issues are categorised to help BWYQ to identify them and prioritise responses.

The categories used to record issues and risks in the BWYQ Risk Management Log are:

- **Operational:** impacts efficiency and effectiveness of BWYQ operations and covers service delivery - these are managed in a day-to-day basis by staff.
- **Organisational:** risks and issues relating to responsibilities, governance and structures
- **Financial:** affects financial position and viability, reliability of reporting, budgetary and financial controls
- **External:** these include any of the factors listed below. This finer detail can be recorded in the 'detail' section on the BWYQ Risk Management Log:
    - **Compliance**: non-compliance with laws, regulations or internal policies.
    - **IT/ Technical/Solution**: risks and issues in relation to BWYQ fitness of purpose of BWYQ IT infrastructure, records and service levels
    - **Centre-specific**: risks and issues affecting Centres and their level of activity, future plans and/or level of regulatory compliance
    - **Business continuity** – risks and issues affecting BWYQ ability to ensure BWYQ will continue to operate effectively in relation to a number of identified scenarios
    - **Procurement/commercial**: risks and issues relating to relationships with third party suppliers and the management and/or delivery of their services
    - **Competition** – developments in relation to BWYQ competitors that carry risks for BWYQ or have resulted in issues that need to be dealt with.

Risk Evaluation

Risk evaluation assesses the probability and impact of individual risks, taking into account any interdependencies, previous trends or factors outside the immediate scope of the area under consideration. Each risk is assigned a status following the matrix below, that assesses a risk in terms of likelihood (i.e. how likely the risk is to occur) and impact (i.e. if the risk were to occur, what would happen).

Likelihood \ Impact	Low	Medium	High	Very High	Impact
Low	Green	Green	Amber	Amber	
Medium	Green	Amber	Amber	Amber-Red	
High	Amber	Amber	Amber-Red	Red	
Very High	Amber	Amber-Red	Red	Red	
Likelihood					

The following assessment criteria can be used to inform BWYQ decisions in identifying and assessing the Likelihood and Impact of risks.

LIKLIHOOD CRITERIA	
Low	• No experience of a similar failure • Excellent track record within BWYQ in relation to the area/activity. • Well established controls (e.g. procedures) in place to manage the area/activity.
Medium	• Not known in recent experience to have occurred before (i.e. in the last 12 months) • Solid track record within BWYQ in relation to the area/activity. • Controls in place (e.g. procedures) to manage the area/activity but have not been frequently applied (due to the nature/frequency of the activity).
High	• Recent experience of this occurring (i.e. within the last 12 months) before • Limited experience within BWYQ in relation to the area/activity. • New controls in place to manage the area/activity but have not yet been applied.
Very high	• Widely known that the risk will occur, and will become an issue and almost certain to happen at some stage. • No experience within BWYQ in relation to the area/activity. • No controls currently in place to manage the area/activity.
IMPACT CRITERIA	
Low	• Financial and/or resource impact less than 1% of on BWYQ 's overall budget (e.g. an overspend or unplanned expenditure) • Financial and/or resource impact less than 1-10% of relevant project/activity budget (e.g. an overspend or unplanned expenditure) • Low impact on service levels/activity. • Affects a low number of learners (less than 50) • No non-compliance with documented procedures • No impact on BWYQ Recognition status
Medium	• Financial and/or resource impact >1% and <5% of on BWYQ 's overall budget (e.g. an overspend or unplanned expenditure) • Financial and/or resource impact less than 11-20% of relevant project/activity budget (e.g. an overspend or unplanned expenditure) • Medium impact on service levels/activity. • Affects a medium number of learners (less than 50 to 250) • Minor non-compliance with documented procedures • No impact on BWYQ Recognition status (other than BWYQ putting in place internal measures and actions) • Performance reporting enacted at staff level • Action plans discussed and enacted at staff level

High	• Financial and/or resource impact >5% and <9% of on BWYQ 's overall budget (e.g. an overspend or unplanned expenditure) • Financial and/or resource impact less than 21-30% of relevant project/activity budget (e.g. an overspend or unplanned expenditure) • High impact on service levels/activity. • Affects a high number of learners (less than 250 to 500) • Article in local/national media • Legal/PR action considered • Significant non-compliance with documented procedures • Potential for Ofqual to be involved and notification to Ofqual considered • Special performance reporting enacted, and actions discussed, at BWYQ Director level due to possible Ofqual involvement
Very high	• Financial and/or resource impact 10% of on BWYQ 's overall budget (e.g. an overspend or unplanned expenditure) • Financial and/or resource impact less than 31%+ of relevant project/activity budget (e.g. an overspend or unplanned expenditure) • Very high impact on service levels/activity. • Affects a very high number of learners (500+) • Prolonged and/or uncontrolled media coverage • Major non-compliance with documented procedures • Potential threat to BWYQ recognition status • Special performance reporting enacted, and actions discussed, at BWY NEC Board level • Legal/PR action confirmed • Notification to Ofqual required

Weighting in relation to the Impact Service Impairment criteria			
Low impact on services	**Medium impact on services**	**High impact on services**	**Very high impact on services**
Certification process time is on average 1 working day over and above the stated SLA*;	Certification process time is on average 1-5 working days over and above the stated SLA;	Certification process time is on average 6-9 working days over and above the stated SLA;	Certification process time is on average 10+ days over and above the stated SLA;
Complaint response time delay of 1 working day over and above the stated SLA;	Complaint response time delay of 2 working days over and above the stated SLA;	Complaint response time delay of 2-5 working days over and above the stated SLA;	Complaint response time delay of 6+ working days over and above the stated SLA;
Centre recognition process time is on average 1 working days over and above the stated SLA;	Centre recognition process time is on average 2-5 working days over and above the stated SLA;	Centre recognition process time is on average 5-10 working days over and above the stated SLA;	Centre recognition process time is on average 10+ working days over and above the stated SLA;
Qualification approval process time is on average 1 working day over and above the stated SLA;	Qualification approval process time is on average 2-5 working days over and above the stated SLA;	Qualification approval process time is on average 5-10 working days over and above the stated SLA;	Qualification approval process time is on average 10+ working days over and above the stated SLA;
Issuing of EV reports is on average 1 working day over and above the stated SLA;	Issuing of EV reports is on average 2 working days over and above the stated SLA;	Issuing of EV reports is on average 3 working day over and above the stated SLA;	Issuing of EV reports is on average 3+ working day over and above the stated SLA;

*SLA – Service Level Agreement

Identifying Suitable Responses to Risks

After identifying risks one or more of the following strategies can be employed (it is important to note BWYQ's response to each risk can be a mixture of pre-emptive and responsive actions).

Prevention	Terminate the risk by doing things differently.
Reduction	Address the risk by putting in place appropriate measures to control it by (either reducing the likelihood of it occurring and/or limiting the impact should it occur.
Acceptance	Acceptance – where nothing can be done at a reasonable cost or time to prevent or reduce the risk, other than plan for contingency measures to deal with it should it occur. For example, dealing with the risk of a flu pandemic may have on BWYQ quality assurance arrangements.
Transference	Reduce the impact by passing the risk on. This is a specialist form or risk response and involves assigning the risk to another party better placed to deal with it. For example, transferring the ownership of a particular risk to an external party/supplier via a contractual clause.

The details of each risk and the action being taken will be recorded against the risk in the BWYQ Risk Management Log.

Issue Evaluation

Issue evaluation is concerned with assessing the impact of individual issues, taking into account any interdependencies, previous trends or factors outside the immediate scope of the area under consideration.

Upon identification and recording of an issue in the BWYQ Risk Management Log, BWYQ will use the following matrix as a tool for assigning an appropriate priority to each issue identified.

Priority		Definition
	Very high	Major impact on project/work schedule, budget, scope or resources
	High	Significant impact on project/work schedule, budget, scope or resources
	Medium	Possible impact on project/work schedule, budget, scope or resources
	Low	No material impact

The Risk Management Log

ID	Risk description	Risk indicators (e.g. events that indicate/signal the risk may occur)	Team	Risk Owner	Likelihood	Impact	Overall Risk Status (Colour Code RAG)	Trend	Date Raised	Review Date	Raised By	Actions AND UPDATES

The Ofqual General Conditions of Recognition state:

A6.3. An awarding organisation must establish and maintain, and at all times comply with, an up to date written contingency plan.

A6.4. A contingency plan must be of sufficient detail and quality to allow the awarding organisation to mitigate, as far as possible, the Adverse Effect of any incident which has been identified by the awarding organisation as having a risk of occurring.

The Risk Management Log is a live workbook where all related matters are recorded, reviewed and reported on. All risks have controls in place and further mitigating actions are reported on in the notes. Where the risk influences business continuity or is influenced by a business continuity item mitigating actions are referenced from the business continuity plan and worksheet. The Risk Management Log links to a record of contingency planning that accompanies BWYQ 003 Business Continuity and Contingency Plan.

Management of Incidents

Issues and incidents will be addressed by BWYQ staff as appropriate. Details of an incident, investigation and updated controls are recorded and BWYQ Trustee-Directors will be notified of updates. The parent company and/or recognised centres may be notified of the updates as appropriate.

Where any incident which could have an Adverse Effect occurs, BWYQ will take all reasonable steps to prevent and/or mitigate/correct the Adverse Effect. BWYQ will give priority to the provision of assessments which accurately differentiate between Learners on the basis of the level of attainment they have demonstrated and to the accurate and timely award of qualifications.

As outlined in the Ofqual General Conditions of Recognition and Guidance (B3.1), the Responsible Officer will promptly inform Ofqual in accordance with the BWYQ procedure for dealing with Adverse Effects (see BWYQ 0001 Governance Manual). The reasonable steps that BWYQ have taken or intend to take to prevent, correct or mitigate the Adverse Effect will be described, including details of any reviews BWYQ are undertaking or intend to carry out. These steps may include checking facts with relevant parties, consulting BWYQ Directors and, if the Responsible Officer lacks expertise in certain fields eg charity governance/ company governance etc, talking to people that have the necessary experience/expertise.

Identifying and Managing Third Party Risks

See BWYQ Business continuity Plan, Scenario 8

For BWYQ, third parties include recognised Centres, contracted self-employed EQAs and advisers, and IT support. Identifying and managing risk associated with these groups follows the principles outlined above. In particular we will consider the following risks;

- Financial – could the third party pose a financial risk to BWYQ or what is the likelihood that the third party will cease trading unexpectedly?

- Security - will the third party be handing confidential material inc. learner details? What measures do they have in place to support physical and cyber security?
- Regulatory – is the third party able to comply with regulatory body requirements?
- Reputational – what is the likelihood of the third party placing the reputation of BWYQ at risk.
- Operational – could the third party disrupt the operations of BWYQ?

All third parties will be expected to have a risk management policy and business continuity plan in place, or be able to satisfactorily demonstrate that they have procedures to manage risk and reasonable contingencies.
This will be established during the recognition/contracting process and monitored during performance reviews.

Cybersecurity Incident Response Plan

BWYQ is a very small organisation with a relatively basic online presence. Whilst we have a website and e-mail accounts, we do not accept payments online nor do we have a social media presence. We acknowledge that we do not have in-house IT expertise due to the size and capacity of the organisation. This is reflected in our cybersecurity incident plan.

The key risks we have identified include;

Risk	Mitigation
Staff member or trustee-director inadvertently clicking on a phishing e-mail	Access to BWYQ e-mail accounts is very limited; one staff member and one trustee-director. These individuals have undergone cybersecurity training.
Learner data hijacked during e-mail transfer.	Learner data is primarily stored using external drives, however, at times it is transferred via e-mail. BWYQ's e-mail system facilitates confidential encryption and attached files are password protected.
E-mail system highjacked	The e-mail system is hosted via a reputable company that facilitates encryption via use of confidential mode with SMS passcode and expiration date. Each email account uses two verification methods for user authentication.
Website highjacked.	Website has no interactive features such as chat boxes. It is hosted and maintained by a reputable company who manage the security of the site.
Online bank account – risk of account details compromised.	Access to the online account is restricted to one employee and a delegated trustee-director. Only the delegated trustee-director may make payments. Login details are not stored electronically. All bank suggested security protocols are used.
Misuse of our data by e-mail provider, web hosting package.	Use of reputable companies with clear data protection polices and protocols.

In the case of a cybersecurity incident the following plan is instigated.

1. The person who detects the incident takes any emergency actions needed to control the situation, such as isolating the system(s) impacted and securing data.
2. This person contacts the BWYQ chair and the IT support company, by phone if necessary or email if this system is unaffected, providing as many details as possible, including;
   - the nature of the incident and which system(s) are impacted
   - the severity of the incident
   - any available information about the origin of the attack

- when the incident was discovered
3. The incident will be categorised and logged as;
   - A threat to data
   - A threat to computer systems and/or
   - A disruption of services
4. Action will be taken to remedy the situation, dependent on the nature of the incident this could include;
   - Informing the necessary authorities (ICO, Ofqual etc) of a data breach
   - Informing learners who have had their data compromised
   - Securing remaining data
   - Securing systems/restoring to an uninfected state
   - Contacting the police is appropriate
5. A written record of the incident and response will be logged, including interviews
6. Review/assess the incident including lessons learned and effectiveness of response. Develop action points in the light of the incident and response.
7. Implement action points.

Contact

If you have any queries about the contents of the policy, please contact the BWYQ Operations Coordinator, bwyqcoordinator@gmail.com

Document History		
Date	**Staff member**	**Action**
July 2015	*BWYQ Operations Coordinator and Responsible Officer: Amanda Buchanan*	*Reviewed and revised*
July 2015	*BWYQ Chair Paul Fox*	*Approved*
September 2016	*BWYQ Operations Coordinator and Responsible Officer: Amanda Buchanan*	*Reviewed and revised*
September 2016	*BWYQ Chair Paul Fox*	*Approved*
November 2017	*Head of BWYQ Operations Responsible Officer: Amanda Buchanan*	*Reviewed and revised*
15.11.17	*BWY Chair Paul Fox*	*Approved*
November 2018	*BWYQ Operations Coordinator*	*Reviewed and revised*
20/11/18	*BWYQ Board of Directors*	*Approved*
July 2019	*BWYQ Operations Coordinator*	*Reviewed and revised*
July 2019	*BWYQ Board of Directors*	*Approved*
November 2020	*BWYQ Operations Coordinator*	*Reviewed and revised*
December 2020	*BWYQ Board of Directors*	*Approved*
May 2021	*BWYQ Operations Coordinator*	*Reviewed and revised*
November 2021	*BWYQ Operations Coordinator*	*Reviewed and revised*
December 2021	*BWYQ Board of Directors*	*Approved*

November 2022	*BWYQ Operations Coordinator*	*Reviewed and revised*
December 2022	*BWYQ Board of Directors*	*Approved*
September 2024	*BWYQ Operations Coordinator*	*Reviewed*
June 2025	*BWYQ Operations Coordinator*	*Reviewed and revised*
June 2025	*BWYQ Board of Directors*	*Approved*