

# Approved Centre Risk Management Policy

## Abstract

This policy establishes a framework for identifying, assessing, and managing risks across approved centres

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**Approved by:** QI team

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## **1. Introduction**

This policy is for centres approved to deliver Active IQ qualifications or units. It outlines Active IQ's approach to working with our centres to successfully identify and manage risks that may be associated with the delivery of regulated qualifications.

## **2. Centre's responsibility**

It is important that all centre staff involved in the management, delivery, assessment and quality assurance of our qualifications are fully aware of the contents of this policy and understand how Active IQ will work with them to identify and manage risks associated with delivering qualifications.

This policy should also be reviewed and understood alongside other related Active IQ policies:

- centre agreement (terms and conditions)
- malpractice policy
- sanctions policy
- appeals policy
- conflict of interest policy

### **3. Identifying and communicating risks**

The task of identifying and managing risks associated with delivering regulated qualifications rests with both centres and Active IQ, as each party has a shared interest in ensuring the successful delivery of the qualifications and the protection of learners' interests.

#### **3.1. Definition of risk**

Risk can be defined as uncertainty about an outcome which has not yet occurred.

Therefore, Active IQ will work with our centres to successfully identify and manage each centre's exposure to risk (that is, the probability of specific events occurring, and the potential impact if they do occur).

The aim is to manage that exposure by taking preventative action to keep the exposure at an acceptable level and in a manner that is cost-effective. We will primarily identify risks through our external verification (quality assurance) visits to centres, although as identified later in this document, some risks may be identified from other sources.

The areas against which we will form risk judgements, and which we believe are a strong indicator of a centre's ability to successfully deliver qualifications, are as follows (further details on their purpose and weightings are outlined below under 'Overall risk rating'):

- management systems and physical resources
- assessment arrangements
- internal verification arrangements
- portfolio sampling
- qualification delivery
- learner experience
- qualification approval
- finance
- malpractice/maladministration

All these areas will be reviewed by the external verifier (EV) during visits to your centre and represent separate sections of our EV report forms. During the visit the EV will assess your level of current compliance for all/some of these areas and record a factual judgement in the report based on your performance at the time of the visit.

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In addition, and at the end of each section, the EV will record the potential future risk associated with the area(s) under review. This is based on several issues, such as those outlined in the next section.

Your centre's risk profile is a simple mechanism to increase visibility of risks and assist you and us to proactively address any emerging risks. In essence, you will be able to see your centre's overall risk rating and ratings assigned to each risk, thereby giving an open and transparent approach.

## 3.2. Evaluating risks

Risk evaluation is concerned with assessing probability and the impact of individual risks, considering any interdependencies, previous trends or factors outside the immediate scope of the risk area.

It is therefore feasible that the rating assigned to a centre's current level of compliance and its future risk rating could be completely different. For example, a centre may be deemed to be fully compliant when the monitoring activity takes place; however, if the Lead Internal Verifier is due to leave in the following month and no replacement has been identified, the centre's risk rating would be raised to reflect this increased risk.

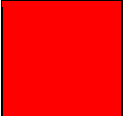
### Active IQ's risk evaluations are based on:

- probability the likelihood of a particular outcome actually happening
- impact the effect or result of a particular event actually happening on the reputation of the centre and the qualification(s) and/or the interests of learners
- awareness the awareness within your centre of the risk and the actions you have, or do not have, in place to successfully deal with the risk (mitigation)

In addition, we will rate risk using the following mechanism to provide a simple visual indication to centres:

	Low: indicates that there are no significant risks identified.
	Medium: indicates that some risks have been identified but that the probability of them occurring, and/or the impact should they occur, is acceptable to a degree but still needs to be managed and addressed.

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	High: indicates that significant risks have been identified and that an immediate response is required by the centre to reduce the probability of the risk occurring and/or the impact should it occur.
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### 3.3. Identifying suitable responses to risk

Upon identifying any risks, your EV will work with you to ensure that a suitable response occurs, as it is in both of our interests to ensure that risks are dealt with effectively.

**Types of responses include:**

Reduction	Address the risk: put in place appropriate actions to control it in some way by either reducing the likelihood of it occurring and/or limiting the impact should it occur. For example, an agreed action plan might be put in place, or in exceptional circumstances, sanctions may be imposed such as the suspension of further registrations.
Contingency	Prepare for the risk: these are actions planned and organised to come into effect as and when the risk occurs. For example, a joint agreement for additional visits or support from Active IQ, or in exceptional circumstances, the application of sanctions such as the suspension of further registrations.
Acceptance	Acceptance: where nothing can be done at a reasonable cost or timescale to mitigate the perceived risk, and where the impact of it occurring is at an acceptable level. For example, whereas some awarding organisations will classify new centres as a high risk, Active IQ may assign them a tier grading based on their compliance and risk rating, and work with them to develop their understanding and capabilities to successfully deliver Active IQ qualifications.
Transference	Reduce the impact by passing the risk on: this is a specialist form of risk response that involves assigning the risk to another party better placed to deal with the risk and/or pick up the outcomes should it occur. For example, in a consortium of centres or across a range of sites linked to a single centre, the main centre manager and point of accountability may opt to pass on the risk to an individual centre/site, or range of centres/sites, and assign them specific actions and/or require them to take ownership for its resolution as they are better placed to successfully address the risk. <i>NB Care should be taken here in case this action conflicts with the terms of the centre agreement.</i>
Prevention	Terminate the risk: do things differently and thus remove the risk where it is feasible to do so. For example, by putting in place actions that either stop the risk from occurring or preventing it from having an adverse impact on delivery arrangements, the integrity of the qualifications, and the interests of learners.

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Although some of the above responses may imply that Active IQ may have no choice but to impose a sanction on a centre if certain risks occur, it should be noted that Active IQ aims to ensure that the application of sanctions is a last resort. We will work collaboratively with the centre to prevent situations arising that might otherwise warrant a sanction being imposed.

### **3.4. Overall risk rating**

While it is essential to both centres and Active IQ to rate risk against key areas, we believe it is also important to form an overarching risk view on each centre's arrangements to:

- ensure centres receive the appropriate level of support and assistance from Active IQ
- help inform the frequency and focus of future centre visits
- help assist centre staff in their internal risk management and resource allocation discussions
- protect the interests of learners
- protect the integrity of our qualifications and the reputation of both the centres and Active IQ
- satisfy the focus of the regulators by providing robust evidence demonstrating that our approach to supporting and quality assuring centres is streamlined, supportive, appropriately targeted and proportional

To determine an overall risk view for a centre, Active IQ will consider the various risks in line with the guidance below.

### 3.5. Example risks and weighting

Area of Centre performance	Example risk	Possible implications	Weighting
Management systems and physical resources	Centre does not maintain records of individual learner progress and achievements	Loss of learner evidence may result in learners being disadvantaged and having to duplicate/repeat work and/or assessments	Deemed an important category (with a high weighting) and a high risk could trigger a change in the overall risk rating for the centre
Assessment arrangements	Centre staff make incorrect assessment judgements regarding the competency of a learner	Learners could be awarded certifications without holding the required knowledge and/or performance skills	Deemed an important category (with a high weighting) and a high risk could trigger a change in the overall risk rating for the centre
Internal verification arrangements	Centre staff not identifying/managing internal risks effectively	Conflicts of interest within the centre could result in learners being awarded achievements that have not actually been gained	Deemed an important category (with a high weighting) and a high risk could trigger a change in the overall risk rating for the centre
Portfolio sampling	Plagiarism of learner work is occurring within the centre and this is not identified or managed by staff	Learners could be awarded certifications without holding the required knowledge and having not completed the required assessments	Deemed an important category (with a high weighting) and a high risk could trigger a change in the overall risk rating for the centre
Qualification delivery	Learners are not provided with sufficient input and/or resources to support the learning process	Learners could be disadvantaged and not prepared sufficiently to sit the required assessments	Deemed an important category (with a high weighting) and a high risk could trigger a change in the overall risk rating for the centre

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Learner experience	Unfair or biased treatment of individual learners	Learners could be disadvantaged and not provided with the same level of support that their peers receive	Deemed an important category (with a high weighting) and a high risk could trigger a change in the overall risk rating for the centre
Qualification approval	Insufficient qualified staff in place to offer/operate the qualification	Qualifications could be delivered by staff who have not been approved, and who do not hold the required competencies	The risk in this section is a warning/flag to those within Active IQ processing any new qualification approval applications and serves to prompt them to discuss a potential concern with the assigned EQA, and which would have been communicated to the centre previously via an EQA action or observation
Finance	Centre does not have the funds and has not paid the bill to register a cohort of learners	Learners working towards an Active IQ qualification may not even be registered with the AO	An Amber rating would be applied if the centre is persistently late in paying fees and would result in the assigned EQA raising the matter at the next visit. An amber rating does not have an impact on the overall risk rating. A Red rating would be applied if the centre failed to pay outstanding fees on time. It will lead to an immediate 'stop' on the centre and the suspension of all future registrations and certifications
Malpractice/maladministration	Centre staff have falsified claims for certification	Certifications could be claimed for non-existent or early-leaver learners (in order to access funding)	An Amber or Red rating in this section would impact on the overall status of the centre. Amber would be applied if there was a case of maladministration/malpractice that is in the early stage of investigation. Red would be applied if malpractice/maladministration is found at the centre after investigation.

Therefore, based on the above indicators, a centre's overall risk rating will be informed using a holistic approach that takes into account the probability and impact of any individual risks identified.

Where risks are identified, EVs will work with centres to agree an appropriate course of action and/or the allocation of sanctions to mitigate the risks. This may also include the planning of a centre spot-check to ensure that all centre approval requirements are consistently adhered to, and that compliance is maintained at all times outside scheduled EV monitoring activities.

#### **4. References to associated documents**

- Active IQ's role of the external verifier policy
- Active IQ's internal verification requirements for centres policy
- Active IQ's centre agreement (terms and conditions)
- Active IQ's malpractice policy
- Active IQ's sanctions policy
- Active IQ's appeals policy
- Active IQ's conflict of interest policy

#### **5. Appeals policy**

If a centre disagrees with a risk rating decision, the first point of call is the EV, in accordance with Active IQ's appeals policy.

#### **6. Implementation and dissemination**

This policy will be implemented immediately upon approval and available on Active IQ website.

#### **7. Monitoring arrangements**

This policy will be reviewed in six months by relevant Active IQ and NCFE colleagues to ensure document is aligned and fit for purpose following full integration of Active IQ.

#### **8. Data retention**

Active IQ will not keep personal data for longer than we need it. Once the retention period is over, and it is no longer justifiable to hold personal data any longer, data will be securely destroyed or anonymised.

## **9. Contact us**

If you have any queries about the contents of the policy, please contact our EV team on:

E: [ev@activeiq.co.uk](mailto:ev@activeiq.co.uk)

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