

CMI Awarding Body

CMI Risk Management Policy and Procedure -
V9

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AB/POL/0009 - January 2026 - V9

History

Date	Amendments Made
January / 2026 / V9	Full review of policy. Integration of CMI Partner Connect Change of name from SQA Accreditation to Qualifications Scotland Accreditation
September 2021 / V8	SQA Principles update Policy Name amendment from "CMI Risk Management Procedure to "CMI Risk Management Policy and Procedure."
November 2020 / V7	Additional risk management guidance added

Intended Audience

- CMI Quality Managers
- CMI Markers and Moderators
- CMI Partner Relationship Managers
- CMI Partner Engagement Managers
- CMI Awarding Body Support Team
- CMI Centres

All of CMI's policies are published on the [CMI Policies Webpage](#)

Purpose

The purpose of this risk management procedure is to ensure that the Awarding Body identifies, assesses, manages, and monitors risks that could impact the integrity, validity, reliability, and compliance of its qualifications and services.

This procedure supports the Awarding Body to:

- Protect the interests of Learners, Apprentices, Centres, and other stakeholders.
- Maintain compliance with regulatory, legal, and contractual requirements.
- Safeguard the integrity, security, and reputation of CMI.
- Support effective decision-making and continuous improvement.
- Minimise the likelihood and impact of adverse events, including malpractice, maladministration, and operational disruption

Risk management is embedded within CMI's governance, strategic planning, and operational activities and is the responsibility of all staff and relevant stakeholders.

Scope

This procedure applies to all CMI Awarding Body staff (including contractors), CMI Trustees/Board members, Senior Leadership, CMI Centres (Approved, Registered and Recognised), where risks may impact qualification delivery.

Regulatory Requirements

This policy meets the regulatory requirements set out by our regulators: Ofqual, CCEA Regulation, Qualifications Wales, and Qualifications Scotland Accreditation.

[Ofqual - General Conditions of Recognition](#)

[Qualifications Wales - Standard Conditions of Recognition](#)

[CCEA Regulation - General Conditions of Recognition](#)

[Qualifications Scotland Accreditation - Regulatory Principles \(2021\)](#)

Regulator or Relevant Regulatory Body	Reference Details	Legislation/Regulatory Reference
Ofqual	General Conditions of Recognition	Condition No: A6 - Identification of management and risks
Qualifications Wales	Standard Conditions of Recognition	Condition No: A6 - Identification of management and risks
CCEA Regulation	General Conditions of Recognition	Condition No: A6 - Identification of management and risks
Qualifications Scotland Accreditation	Regulatory Principles 2021	Principle 4. The awarding body must demonstrate an effective approach to the Identification and management of risk

Definition of Risk

For the purposes of this procedure, a **risk** is defined as the **uncertainty of an outcome**, or the **likelihood of a detrimental outcome**, arising from a combination of the **potential impact** and the **probability** of an **event occurring**, within a range of exposures that may affect CMI’s activities, compliance, or objectives.

Risk Categories

Risks identified under this procedure are classified into the following categories:

Legislative - risks arising from changes to, or non compliance with, legislation, including employment law, data protection, equality legislation, and health and safety requirements.

Regulatory - risks relating to failure to meet the regulatory requirements, conditions, or expectations of regulators and relevant oversight bodies, including risks affecting qualification recognition or approval.

Business - risks that may impact CMI’s strategic objectives, governance, reputation, sustainability, or relationships with Centres and stakeholders.

Economic - risks arising from financial pressures, funding changes, market conditions, cost increases, or reduced demand that may affect financial viability or resource availability.

Operational - risks arising from failures in internal processes, systems, people, or third-party arrangements, including assessment delivery, data management, staffing, and business continuity.

Risk Management Procedure

CMI takes all reasonable steps to identify, monitor and mitigate against any risks that could have an **Adverse Effect** on CMI qualifications and apprenticeship assessment, our regulatory obligations and good practice. However, CMI recognises that from time to time incidents could occur that have not been foreseen, and this policy and procedure have been developed to identify the potential risks and to manage them in an effective manner, to safeguard CMI Learners/Apprentices and CMI qualifications.

CMI procedure for risk will involve the following actions

1. Identification of a risk
2. The risk is reported to the appropriate person.
3. Risk Analysis
4. Intervention and action where appropriate
5. Risk monitoring and review
6. Communication and reporting

Identification of a Risk

There are various methods that can be used to identify risks, such as:

- Business risks (financial checking tools) and fraud risks (identified through financial sanctions or information in the public domain)
- Typical risks in the stages of the Centre Approval process
- Scenario planning as a risk assessment tool
- Risks identified during customer service activities and conversations, including formal Appeals and Complaint
- Process mapping
- CMI Centre visit reports, external quality reports (e.g., QAA, Office for Students, Ofsted, Ofqual) and Centre audit reports

Risk Reporting and Escalation

If you identify a risk, it needs to be raised with the appropriate person in the first instance by informing:-

- Quality Manager and then as follows:
 - Operational incident – Head of Awarding Organisation / Head of Quality
 - Financial incident - Head of Financial Control
 - Qualification incident – Senior Product Development Manager
 - Quality Assurance – Quality Manager

- Overseas incident – Head of Quality / Head of Awarding Organisation

Risks are captured on the Awarding Body Risk Register held on CMI Partner Connect. and controls are agreed and reviewed at the monthly Quality Manager Meetings. Senior Quality Managers are also required to review the Risk Register when completing their quarterly reports.

Risk Analysis

The Head of Quality/Head of Awarding Organisation and the Quality Managers meet on a monthly basis. There is a standard agenda item to analyse risks that have been identified during that month. Risk analysis involves the consideration of the source of risk, the impact/consequence and likelihood to estimate the inherent or unprotected risk without controls in place. It also involves identification of the controls, an estimation of their effectiveness and the resultant level of risk with controls in place (the protected, residual or controlled risk). Applying the risk matrix, it is required to define for each risk its profile using the likelihood and consequences criteria. The CMI risk matrix is shown below.

Impact/Consequence				
Likelihood		Minor	Medium	Major
	Unlikely	Low	Low	Medium
	Possible	Low	Medium	Medium
	Very Possible	Medium	Medium	High
	Almost Certain	Medium	High	High

Likelihood	
Unlikely	Very unlikely to occur - less than 5% chance of occurrence in one year
Possible	Likely to occur in the medium term - 5 - 25% chance of occurrence in any one year
Very Possible	Likely to occur in the shorter term - 26 - 50% chance of occurrence in any one year
Almost Certain	Almost certain to occur, could happen now - 51 - 100% chance of occurrence in any one year

Impact/Consequence	
Minor	Minor delay, inconvenience or impact. Very short term effect. No media interest or reputational damage
Medium	Significant impact on customer service and/or on operational functions. Medium term effect with possible trade and local press interest
Major	Major impact on customer service and/or on operational function. Reputational damage, mid to long-term effect. National and international media attention.

Using the consequence criteria provided in the risk matrix, CMI will determine the consequences of the event occurring (with and without controls in place). To determine the likelihood of the risk occurring, CMI will apply the likelihood criteria (again contained in the risk matrix). As before, the assessment is undertaken with and without current control activities. To determine the level of each risk, CMI can again refer to the risk matrix. The risk level is identified by intersecting the likelihood and consequence levels on the risk matrix.

Intervention and Action where appropriate

The assessment and review will conclude with actions that will mitigate the risk and, if possible, resolve the issue completely. This could include direct action with the Centre/Learner/Apprentice, requiring specific actions to be taken and sanctions to be applied if appropriate. CMI policy and procedures will also be reviewed, and any appropriate changes that might mitigate the risk be made. Should the risk be assessed to be high and the action to mitigate does not reduce this, then the matter will be escalated to the Executive Leadership Team (ELT).

Risk Monitoring and Review

The Head of Quality / Head of Awarding Organisation and the Quality Managers meet on a monthly basis. A standard agenda item is to monitor and review the current risks that are documented on the Risk Register. The quality team will review the following:

- If the risk is still relevant (using the CMI Risk Matrix)
- The consequences are valid
- If the controls in place are effective
- The risk owner
- The control owner

If a new risk is identified, then that risk will be added to the risk register by the Head of Awarding Organisation/Head of Quality/Senior Quality Managers, and a log of the details will be recorded.

Communication and reporting Risk

Management is an integral element of the CMI organisation. At a strategic level, there is a corporate risk register reviewed by the Board of Trustees. Operational risks for the Awarding Body are highlighted via the Regulatory and Compliance Committee (RCC) on a quarterly basis, and any risks are escalated by the CMI Director of Awarding Body, who is a member of the RCC. Reportable incidents are recorded on a log, which is discussed at RCC. Lessons learned, and improvements/future actions are also recorded.

The Awarding Body risk register is reviewed monthly by the Awarding Body Team and shared with the Director. The Director will share this information with the CMI Executive Team as and when required. The Regulatory Compliance Committee will also review the Risk Register each time it meets. This ensures a shared understanding and ownership of the risks being managed in the organisation and allows wider input into their active management and mitigation.

Monitoring and Review

This policy will be reviewed in line with CMI's Document Control Policy.