Risk Management Policy

National Talent Academy Limited
3rd Floor, 1 Ashley Road, Altrincham, Cheshire, WA14 2DT
hello@nationaltalent.org | www.nationaltalent.org

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Version	Date	Author	Changes
2.0	February 2026	National Talent Academy	Redrafted from original Risk policy; separated from

			Health and Safety; contextualised for NTA's online delivery model and TQUK endorsement; added risk register framework, risk categories and risk appetite
2.1	September 2026	National Talent Academy	Added a document control block recording the document owner, status, date published, next scheduled review and contact. Set the review frequency to annual. Corrected the description of certification: TQUK issues the certificate for the full Level 3 Award and NTA issues certificates for individual units, including the mandatory unit.

For use in National Talent Academy policy development

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1. Introduction

1.1 About National Talent Academy

National Talent Academy (NTA) is an educational technology company providing online qualifications in essential work skills for 16–19 year olds and adult learners in Further Education colleges, schools and training providers across the UK.

NTA was founded in 2020 by Cambridge graduate David Jaffa, who previously founded SAM Learning (online GCSE/KS3 revision used in hundreds of UK schools) and Penda Learning (online science/maths for US schools, sold 2019). David received the 2021 BETT Outstanding Achievement Award for his lifetime achievements in EdTech.

1.2 Purpose of This Policy

NTA is committed to identifying, assessing and managing risks that could affect the achievement of its objectives, the integrity of its qualifications, the safety and wellbeing of learners or its ability to deliver its services effectively.

This policy sets out NTA's framework for risk management. It defines how risks are identified, assessed, recorded, monitored and escalated, and establishes clear responsibilities for risk management at all levels of the organisation.

1.3 Scope

This policy applies to all activities carried out by NTA, including:

- The development, delivery, assessment and quality assurance of the NTA Level 3 Award in Essential Work Skills, an unregulated qualification endorsed by Training Qualifications UK (TQUK) as a Certified Learning Course (CLC).

TQUK issues the certificate for the full Level 3 Award; NTA issues certificates for individual units, including the mandatory unit.

- The operation and security of the NTA platform (hosted on LearnWorlds).
- Relationships with delivery partners (FE colleges, schools, sixth forms and training providers).
- The processing and protection of personal data.
- All NTA staff, contractors and third parties acting on behalf of NTA.

1.4 Review

This policy is reviewed annually and may be revised in response to changes in the risk environment, feedback, incidents or guidance from TQUK. The Risk Register is a live document reviewed at every management meeting. Copies of this policy are available at hello@nationaltalent.org or via www.nationaltalent.org.

2. Risk Management Principles

NTA's approach to risk management is based on the following principles:

- Risk management is the responsibility of everyone at NTA. All staff are expected to consider risk as part of their normal activities and to report concerns promptly.
- Risk management is proportionate. NTA applies a level of scrutiny and management effort that is appropriate to the severity and likelihood of each risk.
- Risk management is integrated, not separate. Risk is considered as part of all decision-making, project planning and operational activity – not as an afterthought.
- Risk management is proactive. NTA aims to anticipate and prevent risks from materialising, rather than simply reacting to incidents after they occur.
- Risk management is evidence-based. Risk assessments are informed by data, experience, feedback, quality assurance findings and external intelligence.
- Risk management supports continuous improvement. Lessons learned from incidents, near-misses and risk reviews are used to strengthen NTA's processes and controls.

3. Risk Categories

NTA has identified the following categories of risk relevant to its operations. These categories are used to structure the Risk Register and to ensure that all significant areas of risk are considered:

Risk Category	Examples in an NTA Context
Qualification integrity	Risks to the validity, reliability or credibility of the NTA Level 3 Award, including malpractice, maladministration, plagiarism, assessment irregularities or failure to meet TQUK

	endorsement requirements.
Platform and technology	Risks relating to the NTA platform (hosted on LearnWorlds), including system outages, data loss, cyber-attack, unauthorised access, loss of the automatic evidence trail or failure of third-party technology providers.
Safeguarding	Risks to the safety and wellbeing of learners (particularly 16–18 year olds), including online safety risks, failure to follow safeguarding procedures or failure to act on a disclosure or concern.
Data protection	Risks of personal data breach, non-compliance with UK GDPR / Data Protection Act 2018 or failure to meet ICO requirements. Includes risks relating to third-party data processors.
Delivery partner management	Risks arising from delivery partner non-compliance, failure to meet quality assurance requirements, reputational damage through partner conduct or contractual disputes.
Financial and commercial	Risks to NTA's financial sustainability, including non-payment of fees, cash flow disruption, over-reliance on a single delivery partner or unexpected cost increases.
Regulatory and legal	Risks of non-compliance with applicable law (e.g. consumer rights, equality legislation, employment law), changes to TQUK endorsement requirements or adverse regulatory action.
Operational and staffing	Risks relating to loss of key personnel, inadequate staff training, business continuity (e.g. inability to deliver programmes) or failure of internal processes.
Reputational	Risks to NTA's reputation arising from adverse publicity, complaints, quality failures or the actions of delivery partners, staff or third parties.

These categories are not exhaustive. New categories may be added as NTA's activities develop or as new risks emerge.

4. Risk Assessment

4.1 Probability and Impact Matrix

NTA uses a probability/impact matrix to assess and rate each identified risk. Probability is assessed as Low, Medium or High. Impact is assessed as

Limited/Minor, Moderate or Severe/Critical. The combination of probability and impact determines the overall risk rating:

Impact ↓ / Probability →	Low	Medium	High
Severe / Critical	MEDIUM Monitor and manage	HIGH Substantial management required	**CRITICAL Extensive management crucial**
Moderate	LOW Accept but monitor	MEDIUM Monitor and manage	HIGH Substantial management required
Limited / Minor	VERY LOW Accept risk	LOW Accept but monitor	MEDIUM Monitor and manage

4.2 Risk Appetite

NTA's risk appetite varies by category:

- Qualification integrity and safeguarding: NTA has a very low appetite for risk. Any risk in these categories that is rated Medium or above must be actively managed, with control measures in place.
- Platform and technology, data protection: NTA has a low appetite for risk. Technical safeguards, backups and contingency plans must be maintained.
- Financial, operational and reputational: NTA has a moderate appetite for risk, recognising that some degree of commercial and operational risk is inherent in delivering an innovative service. Risks in these categories are managed proportionately.

The Director will review NTA's risk appetite annually and adjust it as necessary.

5. Risk Management Process

NTA follows a structured six-step process for managing risk:

Step	Stage	Description
1	Identify	Identify potential risks to NTA's objectives, qualification integrity, learners, staff, delivery partners and operations. Risks may be identified through regular review, incident reports, feedback, quality assurance activity or external developments.

2	Assess	Assess each risk using the probability/impact matrix (Section 4). Determine the likelihood of the risk occurring and the severity of its potential impact. Assign a risk rating (Very Low, Low, Medium, High or Critical).
3	Mitigate	Identify and implement appropriate control measures to reduce the probability and/or impact of each risk. Control measures may include policies, procedures, training, technology safeguards, insurance or contractual provisions.
4	Record	Record all identified risks, their assessments, control measures, risk owners and review dates in the NTA Risk Register (Section 6). Assign a named risk owner for each risk.
5	Monitor and review	Monitor risks on an ongoing basis. Review the Risk Register at every management meeting. Reassess risks when circumstances change, when new information becomes available or following an incident.
6	Report and escalate	Report high and critical risks to the Director. Where a risk has materialised or is imminent, escalate immediately. Notify TQUK where a risk affects the integrity of the endorsed qualification.

6. Risk Register

The Risk Register is NTA's central record of all identified risks. It is maintained by the Director and is reviewed at every management meeting. The Risk Register records the following information for each risk:

- A unique reference number.
- A clear description of the risk.
- The risk category (from Section 3).
- The assessed probability and impact.
- The overall risk rating.
- The control measures in place or planned.
- The named risk owner.
- The date of the last review and the next scheduled review.

The Risk Register template is set out below:

Ref	Risk	Categor	Prob.	Impact	Rating	Control	Owner /

	Descriptio n	y				Measures	Review
R01			L / M / H	L / M / S			
R02			L / M / H	L / M / S			
R03			L / M / H	L / M / S			
R04			L / M / H	L / M / S			
R05			L / M / H	L / M / S			

Risks rated High or Critical are standing agenda items at every management meeting. Actions agreed by the management team are recorded in minutes and assigned to a named individual with responsibility for ensuring the action is completed.

7. Response to Risk

The management response to each risk depends on its rating:

Risk Rating	Response	Management Action
Critical	Immediate action	Escalate to the Director immediately. Implement emergency control measures. Notify TQUK if the risk affects qualification integrity. Review daily until the risk is reduced or resolved.
High	Substantial management	Assign a named risk owner. Develop and implement a detailed mitigation plan. Review at every management meeting. Consider whether TQUK notification is required.
Medium	Monitor and manage	Record in the Risk Register with control measures. Monitor at regular intervals. Review at management meetings and reassess quarterly.
Low	Accept but monitor	Record in the Risk Register. Monitor periodically. Reassess annually or when

		circumstances change.
Very Low	Accept	Record in the Risk Register for completeness. No active management required unless circumstances change.

For each risk, the risk owner will determine the most appropriate response from the following options:

Avoid: eliminate the risk by ceasing or changing the activity that gives rise to it.

Reduce: implement control measures to reduce the probability and/or impact of the risk.

Transfer: transfer the risk to a third party (for example, through insurance or contractual provisions).

Accept: accept the risk where the cost of mitigation is disproportionate to the potential impact, or where the risk falls within NTA's stated risk appetite.

8. Business Continuity

NTA maintains business continuity arrangements to ensure that it can continue to deliver its services in the event of a significant disruption. Key business continuity measures include:

- The NTA platform is hosted on LearnWorlds (Google Cloud, Frankfurt), with daily database backups mirrored across multiple facilities and automated failover.
- NTA retains local backups of all critical records (learner data, assessment evidence, quality assurance records).
- Key operational procedures are documented so that they can be carried out by alternative personnel if a key individual is unavailable.
- NTA maintains appropriate insurance coverage, including public liability and professional indemnity.

Business continuity arrangements are tested periodically and reviewed as part of the annual risk review.

9. Incident Management

Where a risk materialises and an incident occurs, NTA will:

- Take immediate action to contain the incident and minimise harm.

- Record the incident, including the date, nature, individuals involved and actions taken.
- Investigate the root cause and determine whether existing controls were adequate.
- Notify relevant parties as required (for example, TQUK, the ICO, delivery partners, affected individuals).
- Implement corrective actions to prevent recurrence.
- Update the Risk Register to reflect lessons learned.

Incident management procedures are set out in more detail in NTA's specific policies (e.g. Data Protection and Privacy Policy for data breaches, Malpractice and Maladministration Policy for assessment irregularities, Safeguarding Policy for safeguarding concerns).

10. Responsibilities

10.1 Director (David Jaffa, Founder)

- Overall responsibility for risk management and for ensuring this policy is implemented.
- Maintaining and owning the Risk Register.
- Chairing risk reviews at management meetings.
- Setting and reviewing NTA's risk appetite.
- Escalating risks to TQUK or other external bodies where required.

10.2 NTA Management

- Ensuring risk management is integrated into day-to-day operations and decision-making.
- Identifying and reporting new risks promptly.
- Implementing and monitoring control measures in their areas of responsibility.
- Ensuring staff receive appropriate risk awareness training.

10.3 All NTA Staff

- Being aware of risks relevant to their roles and following agreed control measures.
- Reporting any new or emerging risks, incidents or near-misses to management promptly.
- Participating in risk management activities, including training and reviews.

10.4 Delivery Partners

- Managing risks within their own organisations that may affect the delivery of NTA programmes.
- Reporting to NTA any incidents, risks or concerns that may affect learners, programme delivery or qualification integrity.
- Cooperating with NTA's risk management and quality assurance processes.

11. Related Policies

This policy should be read in conjunction with the following NTA policies:

- Health and Safety Policy.
- Safeguarding Policy.
- Data Protection and Privacy Policy.
- Malpractice and Maladministration Policy.
- Sanctions Policy.
- Complaints Policy.
- Whistleblowing Policy.
- Internal Quality Assurance Procedure.
- Invoicing and Fees Policy.

12. Contact Information

For any queries about risk management, please contact National Talent Academy:

Email: hello@nationaltalent.org

Website: www.nationaltalent.org

Address: 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, WA14 2DT