

The risk reporting culture according to middle management in a South African public higher education institution

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Mini-dissertation accepted in fulfilment of the requirements for the degree *Master of Commerce in Applied Risk Management* at the North-West University

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NOTES TO EXAMINERS

- The mini-dissertation should demonstrate that the student has the ability to:
 - Do research
 - Constructively criticise own and others' research
 - Report the research results clearly, accurately and concisely with enough information to allow others to evaluate, and perform a similar study, should they wish to do so.
- This study represents the student's learning during a nine-month research project at master's degree level. It is therefore not necessary that the results represent a substantial contribution to the academic knowledge of the field.
- The mini-dissertation was written in article format and consists of three sections: Research project overview, article and reflection. The focus of the mini-dissertation is on the article written by the student.
- The research project overview section should provide a high-level introduction to the research project that adequately prepares the reader to understand how the study fits into the Centre for Applied Risk Management (UARM)'s research projects.
- The potential journal selected by the student is intended as an academic learning experience for the student. If suitable, a reworked version of the article may be submitted to the selected journal post examination.
- The reflection section should provide a critical evaluation of the study and gives the student the opportunity to reflect on her/his personal learning during the project.
- The student should provide a study-specific summary of the literature related to the specific study in the article and is not expected to provide a separate chapter containing a risk culture literature review in the mini-dissertation, as this has been covered and assessed as part of the examined assignment for the Behavioural Risk Management module that forms part of this master's degree.
- The maximum word count for the article is 8000 words. This maximum word count includes words used in tables and figures, and excludes the article abstract, references and appendices. The maximum word count for the abstract is 300.
- The additional information in the appendices should be considered when evaluating the content of the three main sections of the dissertation.
- The role of the supervisors was to provide guidance and assistance on project conceptualisation, data analysis, interpretation and writing skills. The student carried the major responsibility for conceptualising, setting up, executing and writing up the research project.
- Turnitin was used to assist with plagiarism checking before the student was allowed to submit for examination.

PREFACE

This mini-dissertation is the final deliverable for the Master of Commerce (MCom) in Applied Risk Management. The mini-dissertation was written in article format and consists of three sections: research project overview, article, and reflection.

This mini-dissertation is the student's work. The student was responsible for the final concept, set up, execution of the research project and writing of the mini-dissertation. The members of the supervisory team contributed to an advisory and technical support capacity to study conception and design, analysis and interpretation of data and critical revision of the manuscript. The mini-dissertation was language edited before submission.

The main study supervisor gave the student permission to submit this mini-dissertation for examination.

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RESEARCH PROJECT OVERVIEW

The evidence from the literature suggests that the concept of risk culture gained considerable prominence following the 2008/09 global financial crisis. The focus on the financial sector seems to be the reason for the scarcity of literature examining this concept outside the financial sector. The literature further suggests that there is a relatively better understanding of risk management in general, and risk culture in particular, within the financial sector compared to other sectors or industries (Ring, Bryce, McKinney, & Webb, 2016). Risk reporting is an integral part of organisational risk culture. This area does not seem to be adequately covered in the academic literature, either internationally or nationally (Sheedy & Griffin, 2018).

There is limited literature on risk reporting culture in public higher education institutions in general, and in South African public higher education institutions. Furthermore, there is limited literature focusing on the role of middle management in risk reporting, even though middle management employees are essential in translating organisational strategic objectives into daily operational responsibilities in these institutions. The objective of this qualitative interview-based study was to explore the risk reporting culture according to middle management in a South African public higher education institution.

Public higher education institutions play an important role in the training and development of future business leaders, academics, researchers, and a variety of other professionals. The focus for these institutions is primarily teaching and learning, research, and community engagement. While a number of these institutions in South Africa are regarded as world-class institutions that can compete with leading global institutions, a few have been put under administration due to poor governance and management.

The Minister of Higher Education and Training has, in past presentations to Parliament (see <https://pmg.org.za/committee/64/>), raised challenges regarding administration, governance and management at some of these institutions. It can be argued that challenges relating to these matters may be due to poor internal and external risk management, including poor risk reporting.

Journal selection

The *Journal of Risk Research* was chosen as a potential publication for this study. “This is an international, accredited, and peer-reviewed publication committed to publishing theoretical and empirical research at the forefront of the communication, regulation, and management of risk”. Its objective is to contribute to the development of risk management and risk management methodologies.

Information about the journal and guidelines to articles are available online to those who intend to submit articles for review. Research articles in this journal are subjected to rigorous double-blind peer review and must meet the requirements set out for publication (https://www.tandfonline.com/action/authorSubmission?journalCode=rjr20&page=instructions#.Vu_1stPgM8).

ARTICLE

The risk reporting culture according to middle management in a South African public higher education institution

ABSTRACT

Public higher education institutions in South Africa fulfil three main mandates: teaching and learning, research, and community engagement. As the demands on the country's higher education institutions have increased over the years, risk management has become a central responsibility for all employees, particularly those at middle management level, as this group is responsible for executing strategy into operations. There is limited literature on risk reporting culture focusing on higher education institutions and the role of middle management in risk reporting, particularly in South Africa. The objective of the present study, therefore, was to explore the risk reporting culture according to middle management in a South African public higher education institution.

This qualitative study was based on 12 semi-structured interviews with purposively selected middle management participants. Interviews were conducted during the restrictions imposed by the COVID-19 pandemic of 2020, which did not allow face-to-face meetings. Microsoft Teams was used as the preferred method for virtual communication in the institution under study. The interviews were video recorded and later transcribed for purposes of data analysis using coding and then thematic analysis. Four key themes were identified in the study. The findings showed a high degree of alignment between the literature on risk reporting and the reporting by middle management at the institution under study. This appears to demonstrate that risk management reporting is fully embedded into the organisational business processes and operations.

Keywords: Effective communication, Risk communication, Risk culture, Risk Data, Public higher education institution.

1. Introduction

Higher education institutions play an important role in any country by providing the skills and training necessary for social and economic development. Therefore, managing risks that would threaten their ability to carry out this work is an essential part of their responsibility to their students, researchers, and the communities they serve, as well as to their funders, government, and society at large. Good risk management depends on sound, timely and accurate risk reporting supported by a culture that encourages it. Risk reporting helps the institution to deliver on its mandate and safeguard its contribution to the country's advancement. Whereas private higher education institutions are accountable to shareholders and regulatory bodies with only minimal reporting to government, South Africa's public higher education institutions are mainly accountable to government and the legislature for the work they do in the three key areas of teaching and learning, research, and community engagement. Effective risk management is therefore predicated on good risk reporting in all these areas, at times of stability as well as at times of crisis.

The sudden challenges brought about by the global coronavirus (COVID-19) pandemic threatened academic and community-related activities in these institutions in 2020 and may permanently alter ways in which education institutions deliver on their mandate. The nature and the speed of change following the pandemic have highlighted the need, across the board, to review risk reporting processes and culture and determine their fitness for purpose in the new circumstances. In addition, increasing demands on South African public higher education institutions have meant that risk management has become an important responsibility for all levels of management involved in these institutions. This is specially the case for middle management staff who are responsible for informing the faculties in which they work about matters that may pose significant risks in their operations. Internal reporting by middle management, therefore, plays an important role in risk reporting in academic institutions.

Public higher education institutions submit audited annual reports as required by the Minister of Higher Education and Training (DHET, 2014). These reports include a summary of the risks faced and how they were mitigated. Top or executive management is largely responsible for the strategic direction of their institution and for external reporting, while middle management is engaged in decision-making relating to the university's operations and certain strategic areas (Chilvers, Bortolotto, Alefaio-Tugia, Cooper, & Ellison, 2018) and in internal reporting within the institution and within their areas of responsibility. Middle management in public higher education institutions typically includes senior academics serving as heads of departments or of research units or centres, as well as non-academic professional, administrative and support staff (PASS) who also manage junior employees. Middle management employees are critical in translating organisational strategic objectives into daily operational responsibilities.

Accurate and relevant risk reporting is therefore crucial for the work done at both senior and middle management levels. However, little has been published about the role of middle management in risk reporting, despite its importance in an institution's risk management processes.

In the literature, risk reporting has focused mainly on its role in understanding the concept of risk culture more broadly, particularly within the financial services sector, but risk reporting implementation in higher education institutions has been under-explored (Sheedy & Griffin, 2018). The financial sector is highly regulated with heavy penalties imposed for non-compliance, and reporting requirements seem to be standardised. Risk reporting in public higher education institutions is less highly regulated, with no standardised format for reporting. Without standardised templates to follow, risk reporting can be complex and difficult to compare across different higher education institutions and even across different faculties in the same organisation. Several generic indicators of a sound risk culture within an organisation have been identified in the literature, however, including tone from the top; accountability; incentives or rewards; and effective communication and risk challenge (FSB, 2014b). These key features also apply to assessments of the level of a sound risk reporting culture.

The purpose of this study was to explore the risk reporting culture from the perspective of middle management in a South African public higher education institution. The primary focus was on internal risk reporting within the institution. The research question guiding this study was: what is the risk reporting culture according to middle management in a South African public higher education institution, and how does it compare with good reporting practices described in the literature? An earlier unpublished study in 2018 focused on risk reporting in the telecommunications field (Maritz & Mulambya, 2018). This study employs similar indicators from the literature and focuses on the perceptions of middle management in a public higher education institution.

2. Background

2.1 Risk culture

Organisational culture has been defined as the manner in which members of an organisation relate to each other, their work, and the outside world as distinct from other organisations (Agarwal & Kallapur, 2018). In this context, culture refers to "the way we do things around here, even when no one is watching" (IoDSA, 2016). The FSB (2014) refers to culture as values, expectations, beliefs, collective programming of the human mind, a system of meaning, grown opinions and norms, or basic assumptions". However, there is no clear generally accepted definition of risk culture and its meaning remains vague (Agarwal & Kallapur, 2018).

In defining culture, ethics, integrity and personal responsibilities are often cited (Roeschmann, 2014). Risk culture might thus be considered to be "a term describing the values, beliefs, knowledge

and understanding about risk shared by a group of people with a common purpose” (Ring et al., 2016). The literature recognises the need to improve the definition of risk culture, but it is not clear how this should be done (Pan, Siegel, & Wang, 2017). According to Roeschmann (2014), “risk culture guides how risk-relevant information is provided, understood, and used, and how global rules are enacted within the context of local realities”. Other authors link risk culture to the organisation’s propensity to take risks guided by what is considered rational and logical (Bozeman & Kingsley, 1998). In addition, risk culture requires rules and norms that are regarded as balanced, logical and important (Roeschmann, 2014).

2.1.1 Risk communication

Risk communication is one of the behavioural-based indicators of risk culture. This is in line with a model of risk culture indicators whose development was based on the Financial Stability Board’s risk culture indicators (FSB, 2014) and the Dutch National Bank (DNB, 2015). This model shows a dynamic and interlinked view of 10 risk culture indicators. Table 1 provides these indicators, listed in alphabetical order, and shows risk communication (linked to risk reporting) as one of the behavioural-based indicators of risk culture according to this coherent model of risk culture indicators.

Table 1: Risk culture indicators

No.	Risk culture indicator
1	Group dynamics
2	Quality of risk-related information
3	Risk accountability
4	Risk-based incentives
5	Risk challenge
6	Risk communication
7	Risk leadership – tone
8	Risk management framework
9	Risk role clarity
10	Shared understanding of risk

Source: Zaaiman, Van der Flier, & Born, 2020 (In progress).

The present study explored the risk reporting culture according to middle management in a South African public higher education institution compared to good reporting practices recommended in the literature.

In an effort to ensure standard reporting by banking institutions, the Basel Committee on Banking Supervision (BCBS) developed a set of principles for effective risk data aggregation and risk reporting (BCBS, 2013).

Table 2 provides the principles for risk reporting practices from the BCBS Guidelines (2012–2020). These principles are outlined in the various guidelines used by banking institutions.

Table 2: Principles for risk reporting practices from the BCBS Guidelines (2012–2020)

Principles	Explanation of what the principles entail
Accuracy	“Risk management reports should accurately and precisely convey aggregated risk data and reflect risk in an exact manner. Reports should be reconciled and validated”.
Comprehensiveness	“Risk management reports should cover all material risk areas within the organisation. The depth and scope of these reports should be consistent with the size and complexity of the bank’s operations and risk profile, as well as the requirements of the recipients”.
Clarity and usefulness	“Risk management reports should communicate information in a clear and concise manner. Reports should be easy to understand yet comprehensive enough to facilitate informed decision-making. Reports should include an appropriate balance between risk data, analysis and interpretation, and qualitative explanations. Reports should include meaningful information tailored to the needs of the recipients”.
Frequency	“The board and senior management (or other recipients as appropriate) should set the frequency of risk management report production and distribution. Frequency requirements should reflect the needs of the recipients, the nature of the risk reported, and the speed at which the risk can change, as well as the importance of reports in contributing to sound risk management and effective and efficient decision-making across the bank. The frequency of reports should be increased during times of stress/crisis”.
Distribution	“Risk management reports should be distributed to the relevant parties and while ensuring confidentiality is maintained”.

Source: (BCBS, 2013).

The above principles are generic, and applicable beyond the banking sector for which they were developed. They have therefore been selected for use in this study as the basis for exploring risk reporting at the public higher education institution under study.

2.2 The South African public higher education sector

South Africa’s 26 public higher education institutions (also referred to as public universities) are made up of comprehensive and traditional universities and universities of technology (UoTs) and established by an Act of Parliament. Higher education institutions are defined as “any institution that provides higher education on a fulltime, part-time or distance basis and which is – (a) merged, established or deemed to be established as a public higher education institution under the (Higher Education) Act; (b) declared as a public higher education institution under this Act; or (c) registered or provisionally registered as a private higher education institution under this Act” (DHET, 1997). Public higher education institutions receive subsidies from government as part of their funding (Bangani, 2018).

Private institutions do not receive any government subsidies but nevertheless have to provide an annual report that meets requirements set out by the Department of Higher Education and Training (DHET, 2016).

The governance of each public higher education institution vests with the Council (equivalent of a board of directors) which is its highest decision-making body. At a management level, the Vice-Chancellor or Principal (also known as Rector) is the Chief Executive Officer and has a team of executive officials responsible for various portfolios including teaching and learning, research, operations, and communication. These officials are part of executive management and largely responsible for day-to-day decision-making in the institution. At faculty level, there are deans with executive authority and operational responsibility for their respective departments. They are supported by heads of departments (academics) and administrative officials including faculty managers and faculty finance managers. The faculty managers and faculty finance managers form part of middle management and have several administrative staff reporting to them.

2.3 Risk reporting in higher education institutions

Several researchers and academics have reported that higher education institutions are essentially risky institutions, given the expansion of the sector over the last decade in terms of student numbers, increased competition, and the innovation required to remain relevant in an ever-changing education landscape (Edwards, 2012). Other authors have listed massification of higher education, and admitting new types of students including women, minorities, part-time and intermittent learners and mature students, coupled with the need for social justice, as demands which inevitably bring more risks to the higher education sector, including failure to maintain good academic standards and lack of quality research (Swartz, Ivancheva, Czerniewicz, & Morris, 2019). All these demands make risk reporting an important element of effective risk management.

In the United Kingdom, part of continued government funding is the demonstrable ability to show that the higher education institution has a system of risk controls used for monitoring and supervision of potential risks. This requirement follows on the move by institutions that have taken on commercially related activities not traditionally associated with higher education institutions (Hommel & King, 2013).

The Regulations for Reporting by Public Higher Education Institutions in South Africa require the institution's council to play a key role in risk management, including providing a statement on risk management in its Annual Report on how the institution has dealt with the issue of risk management. Council is also mandated to identify "risks (typically the top 10 to 20 risks); the likelihood of each risk occurring; an assessment of the identified risk's potential impact; and the measures put in place to mitigate the risks"(DHET, 2014).

Desirable risk management behaviour includes, amongst other things, risk reporting, displaying

accountability for risk throughout the organisation, open communication and effective challenge with regard to risk management (Sheedy & Griffin, 2018). New ways of resilience management can assist in the proactive management of risks in return for a reduction in insurance premiums or risk-financing costs (WEF, 2020).

A study of Australian universities on risk management showed that some universities were reshaping their identities in line with new principles of good corporate governance; however, many were not achieving the envisaged success and encountered problems in the adoption of new risk management principles. At the operational level, this involved coordinating the compliance of the framework throughout the organisation, and periodically reporting identified and managed risks to the oversight committees (Christopher & Sarens, 2015).

A South African study on risk management in higher education institutions, which examined how risk was governed within higher education institutions based on the requirements of the King III Report on Corporate Governance (2016) and other relevant literature, established that the levels of compliance were far from ideal based on the disclosure provided (Moloi, 2016). However, the limitation of that study was that it was based on document analysis and analysed only publicly available reports, which do not always provide the full scale of risk reporting in higher education institutions. Good and effective risk reporting is directly linked to the usefulness of risk data that an institution can provide both internally and externally. Moloi (2016), in his review of governance of risks in South Africa's public higher education institutions (HEIs), argues that "every strategic decision being undertaken should be accompanied by a proper risk assessment to identify potential pitfalls (threats) and/or take advantage to achieve results promptly (opportunities)". Risk resilience is important not only to develop mitigation plans for identified risks but to also assist in the identification of new opportunities (WEF, 2020).

Higher education institutions are increasingly facing risks that require constant risk reporting (Brynin, 2013). Reporting in higher education institutions is done both internally and externally; however, risk reporting is still developing in these institutions. Higher education institutions prepare annual reports, which include internal controls and risk management as part of their responsibility for receiving government funding (DHET, 1997). Internally, middle managers report to various governance structures in their faculties, including the Faculty Board, Dean's Advisory Committees (DAC) and other internal committees. The challenges with these reports include the lack of standard reporting templates, which means that the detail and quality of these reports tend to differ. Internal reporting is not regulated and depends on each higher education internal stakeholder's requirements.

2.4 The organisation under study

The public higher education institution selected for this study is consistently ranked as one of the top academic institutions in Africa and is classified as a traditional university; it offers high-quality

academic programmes and is home to prestigious scholars and researchers in various disciplines. The institution has received clean audited reports and has strong governance processes in place. Like all public higher education institutions in South Africa, and as part of its reporting obligation on its use of government funding, it submits an annual report to the DHET. This area of risk management has received considerable attention over the past decade and this annual report covers internal administration, operational structures and controls that incorporate risk management practices in the institution. The annual report also lists the roles of Council (the highest decision-making body in a public higher education institution, equivalent to a board of directors), the Audit and Risk Committee (a committee of Council), and the internal risk management executive committee (comprising senior management) as key stakeholders and decision-makers in the risk management process. Despite the focus on risk management in higher education institutions, risk reporting is left entirely up to each institution with no guidelines provided. This means that risk reporting comparisons across public higher institutions become challenging as there is no specific format out of which a researcher can extract or determine baseline information.

3. Method

The study followed a qualitative research approach using thematic literature analysis for identifying and examining key themes and patterns relating to risk reporting. A quantitative research approach provides the researcher with a better opportunity to understand the concepts to be studied and makes provision for theories to be tested (Golafshani, 2003). This qualitative interview-based study was designed to gather responses from selected participants. Interviews are a familiar strategy for collecting qualitative data and are widely used in field studies (Dicicco-Bloom & Crabtree, 2006). Interviews permit participants to provide and elaborate on their own answers, allowing the researcher to collect in-depth views and thoughts (Stuckey, 2013) and to probe where clarity is needed (Bolderston, 2012). Given that the study aimed to explore middle management's perceptions and experiences of the risk reporting culture in the institution under study, semi-structured interviews were deemed the most appropriate data collection method as it allowed for an element of flexibility while providing some structure for the interview process (Qu & Dumay, 2011).

3.1 Participants in the study and sampling

The higher education institution under study classifies its employees into two categories, namely, academic staff (including researchers), and non-academic staff relating to professional, administrative and support services (PASS). This study focused on PASS staff, as their role in the institution's risk reporting processes is deeply embedded in their role as implementers of policy. They prepare reports that are discussed at decision-making bodies at faculty levels (i.e., Faculty Board and Dean's Advisory Committee).

The finance manager and faculty manager are among the key officials in the operations and

administration of the higher education institution under study. The institution has seven academic faculties, each with its own finance manager and faculty manager. The finance managers are supported by assistant finance managers and several other finance officials. Similarly, the faculty manager is supported by respective officers responsible for administrative and support-related activities. In line with the institution's risk management approach, risk reporting is an important part of the institution's reports. Once risks have been identified, plans on how to mitigate those risks must also be developed. Purposeful sampling, which is a selective approach in which the researcher chooses their participants (Bolderston, 2012), was used in this study. All the participants were selected based on their middle management positions. The reason and power of purposeful sampling lie in selecting information-rich cases for a study, and it requires access to key informants in the field who can assist in the provision of key information required (Suri, 2011).

A total of 12 participants were interviewed in this study from a total population of 14 managers in a similar role within the higher education institution. All potential participants were approached via email and asked if they were willing to be interviewed (the consent form is included as appendix A). There is no ideal number of participants for a qualitative study, as the number is normally determined by the optimum number of participants needed to make valid extrapolations to generalise the results (Nowell, Norris, White, & Moules, 2017b). The faculty manager and faculty finance manager in each faculty are involved in its administrative, operational, and academic decision-making processes. Each faculty has a similar structure, and all managers have the same reporting responsibilities.

Selecting participants depends on the intent of the researcher and means involving those who are representative of the group being studied, in line with the study aims (Bolderston, 2012). The plan for this study was to interview up to 14 participants (that is, two per faculty) or until data saturation was reached. However, only 12 participants were interviewed as data saturation was reached after 8 interviews and this number therefore satisfied the aims of this study. Data saturation refers to a point where no new information or theme emanates from the interview data indicating that enough data has been collected (Qu & Dumay, 2011).

Demographic information including each participant's payclass (PC), years of services at higher education institutions, and years employed in the current position was collected during the interview. A pay class denotes a participants' level of seniority and ranges from PC 1 for (administrative) junior staff to PC 13 for senior managers.

Table 3 provides an overview of the demographic profile of all participants who were interviewed in the study. This profile captures the years of experience in the institution, years of experience in the current position, role or position in the institution and their seniority (i.e., payclass) within the institution.

Table 3: Demographic profile of participants

Classification criteria	Variables	Total	Frequency (%)
Years of experience in the institution	<5	6	50
	5–10	2	17
	>10	4	33
Years of experience in the current position	<5	9	75
	5–10	1	8
	>10	2	17
Role or position in the institution	Finance Manager	6	50
	Faculty Manager	6	50
Payclass or seniority	11	2	17
	12	9	75
	13	1	8

The participants payclass (11-13) depends on the size and complexity of a faculty but carries the same job title. The faculty managers are either payclass 11 or payclass 12, whilst the finance managers range from payclass 11 to 13.

3.2 Data Collection

Semi-structured interviews using four open-ended questions were conducted to obtain the views of participants about their risk reporting experiences and reporting practices. Regulations to reduce the spread of the global coronavirus (COVID-19) at the time of this study meant that interviews had to be conducted virtually. Microsoft Teams was used, being the institution's preferred electronic communication channel and with which, all participants were familiar. The Microsoft Teams program generated transcriptions during each interview, which were edited afterwards. In addition, Microsoft Teams allows for an interactive transcription, which is helpful in data analysis. The number of participants, and the purposive sampling that targeted a select cohort of managers in the public higher education institution, yielded important views and insights given their respective roles and responsibilities at the institution.

The interview questions related to the ways in which participants managed the current processes for risk data in relation to five key areas, namely: (i) governance and assurance, (ii) accuracy and integrity, (iii) completeness, (iv) timeliness, and (v) adaptability (the interview guide is included as appendix B). The purpose of these questions was to gather information that would lead to insights and understanding of risk data from middle management in the higher education institution under

study. Participants were requested to provide specific examples in their responses to questions where relevant to give sufficient depth to the information provided.

3.3 Data Analysis

The UARM risk-informed decision culture (RiDC) and Codebook (Zaaiman et al., 2020 (In progress)) was used as a basis for the design and coding of the study results. The study data were analysed with the aim of achieving thematic data saturation. Given that all the university's faculties share the same internal reporting structures, the thematic data saturation point was reached after eight interviews, beyond which no new codes and themes emerged. Thematic analysis is common in qualitative research as it involves the identification, analysis, and interpretation of data into themes and codes: Thematic analysis is an iterative process consisting of six steps: (1) becoming familiar with the data, (2) generating codes, (3) generating code categories or themes, (4) reviewing themes, (5) defining and naming themes, and (6) locating exemplars (Galanis, 2018). In the present study, Microsoft Excel 2019 was employed for thematic analysis.

Table 4 summarises the process followed in the analysis of the six selected articles using thematic analysis. The two most common methods in qualitative analysis are qualitative content analysis and thematic analysis (Vaismoradi, Turunen, & Bondas, 2013).

Table 4: Stages in the thematic analysis process followed in the study

Stage One	This stage involved understanding the information from the selected literature and reading relevant peer-reviewed journals as the basis for review. Key in this process was how risk culture was defined and whether the articles had two more or more two components of risk culture indicators.
Stage Two	This phase involved identifying the codes relating to risk reporting and related features from the selected literature. Consulting-house documents and (especially) those on banking supervision provided the most relevant information on risk reporting.
Stage Three	Codes were identified and grouped into potential themes based on the data collated.
Stage Four	The UARM RCI codebook formed the basis for the thematic analysis and this was used to check whether the themes were aligned to the data collated.
Stage Five	There was continuing analysis to ensure that the above process was aligned and the name of each theme identified.
Stage Six	This took place when the information analysed was written up and then presented in the report. Presenting the report in a concise manner proved more challenging than anticipated.

Source: Vaismoradi (et al, 2013) and Nowell (2017).

Qualitative content analysis (QCA) is an investigation method for the description and understanding of textual data using an organised process of coding, whereas thematic analysis is a system for distinguishing, analysing, and reporting patterns (themes) within data (Assarroudi et al., 2018). In thematic analysis, the "researcher" analyses the chosen data and performs coding and category construction, based on the data's characteristics, to identify themes relevant to the field of study"

Bowen (2009). In qualitative research, credibility, dependability, trustworthiness, transferability, and confirmability are essential (Nowell, Norris, White, & Moules, 2017a). However, a few researchers have questioned the validity and reliability tests and measures used in qualitative research, as these cannot be applied to qualitative research (Noble & Smith).

To enhance the credibility of the study, a code was accepted only if such a code was cited by three or more participants as this was important for the researcher to identify specific themes. A peer-review process, in which the study supervisor continually asked questions on the method, meanings and interpretations of the study, was used as an external check on the research process to mitigate against possible researcher biases and to optimise the credibility of the study. Thus, the rigour and credibility of this study were improved by using three code citations for code acceptance as well as study supervisor peer reviews.

3.4 Ethical considerations

This study went through two ethical processes, first with the higher education institution where the degree was registered and, second, with the one that was being studied. In addition, permission was sought from the latter's Human Resources Department for staff to be interviewed. All the participants provided their consent prior to being interviewed and the researcher provided assurance that the recording would remain confidential.

4 Results and Discussion

4.1 Results

This section provides a summary of the risk reporting best practices derived from the literature. These best practices provided a standard against which themes emanating from the interview data were compared. These best practices were largely drawn from the Principles of Effective Risk Data Aggregation and Risk Reporting (BCBS, 2012). Banking regulators found that several corporate failures are related to poor communication among the different lines of defence, with the result that the roles and responsibilities of the different authorities were never fully understood (Agarwal & Kallapur, 2018).

Table 5 provides codes drawn from the literature on risk data and risk reporting. The codes are presented with supporting quotations from the literature.

Table 5: Codebook from the literature on risk data and risk reporting best practices

No.	Code	Supporting quotes from the literature	Source
1	Good/sound corporate culture and governance	"Management should develop a written code of ethics or a code of conduct. Either code is intended to foster a culture of honesty and accountability to protect the interest of its customers and shareholders".	(BCBS, 2015)
2	Leadership and tone from the top	"An organisation's culture is reflected by what is valued, the dominant leadership styles, the language and symbols, the procedures and routines, and the definitions of success that make an organisation unique".	(Ashby, Palermo, & Power, 2012)
3	Clear lines of accountability	"Risk owners are accountable for developing relevant success measures, strategies that mitigate, respond to, and track identified risks".	(BCBS, 2015)
4	Oversight and management from the governance structure	"Risk oversight begins with a company's board; and management is responsible for developing and executing strategic and operational risk management consistent with the strategy set by the board"	(Gupta & Leech, 2014)
5	Effective communication lines	"Informal communication is often seen as a better indicator of true priorities rather than formal communication with its emphasis on espoused policy".	(Sheedy, Zhang, & Tam, 2019)
6	Internal decision-making	"To manage risk effectively, the right information needs to be presented to the right people at the right time. This will allow for more effective decision-making".	(BCBS, 2015)
7	Risk Data: Governance and Assurance	"The degree of sophistication of the bank's (organisation's) risk management infrastructure – including, in particular, a sufficiently robust data infrastructure, data architecture and information technology infrastructure – should keep pace with developments such as balance sheet and revenue growth".	(BCBS, 2015)
8	Risk Data: Accuracy and Integrity	"An organisation should be able to generate accurate and reliable risk data to meet normal and stress/crisis reporting accuracy requirements. Data should be aggregated on a largely automated basis to minimise the probability of errors".	(BCBS, 2017)
9	Risk Data: Adaptability	"A bank (organisation) should be able to generate aggregate risk data to meet a broad range of on-demand, ad hoc risk management reporting requests, including requests during crisis situations, requests due to changing internal needs and requests to meet supervisory queries".	(BCBS, 2015)"
10	Risk Data: Completeness	"Senior management receives clear and concise reports that highlight the key messages and risks in an easily digestible format, it is possible to drill down into the information for further detail and to trace where the information originated".	(BCBS, 2012)
11	Risk Data: Timeliness	"The processes established to ensure that all material risks and associated risk concentrations are identified, measured, limited, controlled, mitigated and reported on a timely and comprehensive basis".	(BCBS, 2015)

No.	Code	Supporting quotes from the literature	Source
12	Risk Reporting Practices	"Reporting should accurately communicate risk exposures and results of stress tests or scenario analyses and should provoke a robust discussion of, for example, the bank's current and prospective exposures (particularly under stressed scenarios), risk/return relationships and risk appetite and limits".	(BCBS, 2020)
13	Risk Reporting: Governance and Assurance	"A bank's (organisation) risk data aggregation capabilities and risk-reporting practices should be subject to strong governance arrangements consistent with other principles and guidance established by the Basel Committee".	(BCBS, 2020)
14	Risk Reporting: Accuracy	"A bank should be able to generate accurate and reliable risk data to meet normal and stress/crisis reporting accuracy requirements. Data should be aggregated on a largely automated basis to minimise the probability of errors".	(BCBS, 2017)
15	Risk Reporting: Clarity and Usefulness	"Reporting requires an organisation with clear and complete policies that assist management to understand their role. "Organizations should include risk culture metrics in their regular risk reporting to the board and management ".	(Delloite, 2009)
16	Risk Reporting: Comprehensiveness	"The processes established to ensure that all material risks and associated risk concentrations are identified, measured, limited, controlled, mitigated and reported on a timely and comprehensive basis".	(BCBS, 2015)
17	Risk Reporting: Distribution	"It is important for ensuring that the adequate people or groups receive the appropriate risk reports. - Risk management reports should be distributed to the relevant parties while ensuring confidentiality is maintained "	(BCBS, 2013)
18	Risk Reporting Frequency	"Frequency requirements should reflect the needs of the recipients, the nature of the risk reported, and the speed at which the risk can change, as well as the importance of reports in contributing to sound risk management and effective and efficient decision-making across the bank"	(BCBS, 2013)
19	Risk Management	"Risk management has been broadly described as the package of management controls that needs to be put in place to manage risk".	(Christopher & Sarens, 2015)
20	Risk Reporting Challenges	"Supervisors observe that making improvements in risk data aggregation capabilities and risk reporting practices remains a challenge for banks".	(BCBS, 2012)

A total of 20 codes were identified by the researcher and formed the basis for comparative analysis between information drawn from literature and responses from participants from the public higher education in question. Table 6 provides a summary of the 20 codes which are compared with codes derived from the literature. Based on the 20 codes identified, four themes were identified (Tables 7–11). The four themes were identified based on thematic analysis undertaken linked to best practices from the literature.

Table 6: A summary of the participants' responses based on the identified codes

No.	Codes	Extracts from the literature	Participants' interview quotes		
			Participants' quotes	Participants' quotes	Participants' quotes
1	Good/sound corporate culture and governance	"The board approves the firm's strategic plan (e.g., risk tolerance, risk appetite, business strategy) and oversees the implementation of the firm's policies for risk, risk management and compliance relating to risk management." (FSB, 2013).	"We have the faculty board that's overall responsible for governance [and] a faculty executive committee, made up of all different head of departments in the faculty it meets once a week" (Participant 2).	"There are set government structures in which matters are escalated to the relevant decision-makers" (Participant 5).	"We have a faculty board which is the highest decision making body in the Faculty, but there are a number of committees which are also key in the governance process" (Participant 12).
2	Leadership and tone from the top	"The leadership of the institution promotes, monitors, and assesses the risk culture of the financial institution; considers the impact of culture on safety and soundness; and makes changes where necessary" (FSB, 2014a).	"The new leadership with the Deanery is going to ensure that we do not do what we used to do in the past. This style of leadership is welcome by all, and we are very much a better Faculty" (Participant 7).	"The Dean is proactive when it comes to risk management and emphasise the need to ensure that risk is managed at an operational level" (Participant 10).	"I believe the Faculty leadership is trying, new leadership to impose or bring upon a compliance. However, you would find that there are behavioural issues amongst academics" (Participant 5).
3	Clear lines of accountability	"Full accountability is accomplished only when an organization combines broad public disclosures with extensive internal performance reporting. By doing so, organizations create value for the stakeholders whose support is needed to prosper" (Epstein & Buhovac, 2006).	"There are structures and committees which deal with certain matters, there's some committee which deals with this like mental health committee or academic throughput which deals with the matter and will report" (Participant 7).	"There is the academic committee that has oversight of all academic issues, and we also have a Management Committee that deals with operational matters including financial sustainability of the school" (Participant 5).	"We have a Deans Advisory Committee that is made up of 12 heads of departments and directors from the research centres" (Participant 11).
4	Oversight and management from the governance structure	"Risk governance, internal controls and risk management functions, as well as risk data aggregation and risk reporting capabilities. Governance processes should be designed to work against the erosion of risk management practices through changing business and economic environments" (BCBS, 2015).	"Each faculty is established with the board which the Dean reports to and then to highest structures at the University, including Senate and Council, and part of the faculty structures is a faculty management committee which deals with management issues in relation to finance and other management related issues" (Participant 6).	"The delegation of authority's, the university vests its authority in the officers who act on behalf of various committees" (Participant 3).	"I have an oversight role, so I do know exactly all the funds in all the journals that went through on a specific fund for a funder" (Participant 4).

Codes		Extracts from the literature		Participants' interview quotes	
No.			Participants' quotes	Participants' quotes	Participants' quotes
5	Effective communication lines	"Effective and audience-appropriate communication at regular intervals. There are also open lines of communication among business lines as exhibited by regular interdepartmental meetings on data governance" (BCBS, 2020).	"I don't think that we necessarily highlight risks. I think if I identify the risk, I will probably write a briefing document for the Director or the DVC., whoever I was escalating the issue to, I will then schedule a meeting with the individual and provide them with the briefing" (Participant 1).	"We escalate these matters at our management level meetings, and we play a huge role in guiding all staff about the risks associated with certain activities" (Participant 7).	"Firstly, I will send emails, any changes in policies or any issue that I want to highlight I will forward a general email to the whole group. In terms of the Group's overall governance structure, the meetings of the Boards accountable are conducted to improve the flow of information and to increase the efficiency of the Boards" (Participant 9).
6	Internal decision-making	"The board of directors should oversee senior management to ensure that the policies, processes and systems are implemented effectively at all decision levels. Committee meetings should be held at appropriate frequencies with adequate time and resources to permit productive discussion and decision-making" (BCBS, 2012).	"I think we almost in crisis management this year just to make sure that we can still complete the academic year. I mean obviously you have to look at the risks, but it is almost happening at such a speed just to keep things going and decisions are made on the go" (Participant 2).	"If someone has taken a decision in relation to a particular event, yeah, that person cannot hear the appeal. So, the appeal is always to another authority" (Participant 3).	"The information is provided at the faculty board and presented to the meeting for approval. If there is no meeting, then a Dean's Circular will be presented" (Participant 12).
7	Risk Data: Governance and Assurance	"An organisation should design, build and maintain data architecture and IT infrastructure which fully supports its risk data aggregation capabilities and risk reporting practices not only in normal times but also during times of stress or crisis, while still meeting the other Principles" (BIS, 2017).	"We have the Dean's advisory committee, which of course consists of all faculty and departmental heads. There is also myself, HR, and Finance Department and the purpose of that advisory committees is to advise the Dean on departmental and academic admin related matters" (Participant 1).	"We have a faculty board which is the highest decision making body in the Faculty, but there are a number of committees which are also key in the governance process. Most of the work is done by the Faculty Management Committee" (Participant 12).	"We have a Dean's Advisory Committee which comprises of Head of Departments and plays a key role in the governance of the Faculty" (Participant 10).
8	Risk Data: Accuracy and Integrity	"Accuracy and Integrity – A bank should be able to generate accurate and reliable risk data to meet normal and stress/crisis reporting accuracy requirements. Data should be aggregated on a largely automated basis so as to	"The integrity of data is a problem for us as we have no one repository of all our data. We have it in our budget to create a database for accreditation information. There is cross reference to SAP and PeopleSoft" (Participant 2).	"I will do reasonability checks and I will check with them if something looks out of the ordinary. Most of the time I will also check the variances if I know, for instance, that we were supposed to receive certain amounts of donations in the middle of the year,	"We rely on the information in the system but have concerns about some fields which if not completed may give incomplete information. We normally encounter these problems when dealing with student admissions" (Participant 11).

Codes		Extracts from the literature		Participants' interview quotes	
No.			Participants' quotes	Participants' quotes	Participants' quotes
		minimise the probability of errors" (BCBS, 2013).		then I will check whether we have received them" (Participant 8).	
9	Risk Data: Adaptability	"A bank's risk data aggregation capabilities should be flexible and adaptable to meet ad hoc data requests as needed, and forward-looking to assess emerging risks. Adaptability will enable banks to conduct better risk management, including forecasting information, as well as to support stress testing and scenario analyses" (BCBS, 2013).	"Once you've verified that or you find a way of defining it and describing it, so you've built the universe of defining it in terms of policy that others can understand" (Participant 4).	"Staff know that there are rules in place, so they cannot backdate without approval. So there is no flexibility or adaptability and you abide by the rules and how the data is provided must be consistent" (Participant 8).	"It depends on the nature of the reports but the reports are standard depending on what kind of report. There is no flexibility on some of the data especially to the Department of Higher Education and Training" (Participant 12).
10	Risk Data: Completeness	"A bank should be able to capture and aggregate all material risk data across the banking group. Data should be available by business line, legal entity, asset type, industry, region and other groupings that permit identifying and reporting risk exposures" (BCBS, 2017).	"I provide all information necessary for management to engage and make a decision based on what we get from the system" (Participant 1).	"This is usually detected early in the academic year; in the past years it would have taken some time for the issue to be detected. There has at times been lags and constant reminders as the Deanery is involved on so many things." (Participant 5).	"There are mechanisms you can always use to double check, so I will check one report using two systems and expect the same outcome. I can also compare from past trends and see if there are huge variances and what is the cause of these. inconsistencies" (Participant 12).
11	Risk Data: Timeliness	"The precise timing will depend upon the nature and potential volatility of the risk being measured as well as its criticality to the overall risk profile of the bank. This timeliness should meet bank-established frequency requirements for normal and stress/crisis risk management reporting" (BCBS, 2013).	"The timelines tend to be specific to the issue. I think that when it comes, you know in the faculty you usually trying to deal with things within a year of registration, because there are certain statutory data returns that we need to make to government agencies, and to amend those after the facts would create problems for the audit trail" (Participant 3).	"Reporting is in line with set deadlines especially when dealing with external accreditation agencies. For finance we prepare monthly or quarterly reports. For my reports, there has been some delays with reporting when templates were provided late but actual templates for submission are done on time" (Participant 7).	"We do monthly reporting to Central Finance. The timelines are normally fixed when I have to report to the centre which runs on a monthly quarterly timeline for the DLC. There's more flexibility within the DAC. Reporting to the funders is in line with the terms and conditions of the contract" (Participant 10).
12	Risk Reporting Practices	"Guidelines helps senior management go beyond regulatory compliance regarding risk reporting, and seize the opportunity to improve reporting practices to drive better	"We know there are various set month and cut off dates that we got to comply with, and then find the various deadlines" (Participant 4).	"We are guided by the Central Finance timelines but have developed our own timelines" (Participant 7).	"Information must be logged on timely like enrolment information. Information is reported three times for subsidy purposes, so it is important that information is captured at the correct

Codes		Extracts from the literature		Participants' interview quotes	
No.			Participants' quotes	Participants' quotes	Participants' quotes
		performance" (Epstein & Buhovac, 2006).			time. There is no flexibility around this process" (Participant 12).
13	Risk Reporting: Governance and Assurance	"High quality management reports rely on the existence of strong risk data aggregation capabilities, and sound infrastructure and governance ensures the information flow from one to the other" (BCBS, 2012).	"It's quite significantly done to the point that when somebody presents at an exam board for example, it's not new news, we would have known all the history pertaining to that. Of course, this confidentiality that's exercised, but we would know that that student had challenges" (Participant 5).	"About committees is that there is always a record that is lodged in the permanent records at the University because the minutes are held so it becomes a formal record that you can then reference and following it becomes objective and transparent external to the parties concerned" (Participant 3).	"In terms of the Group's overall governance structure, the meetings of the Boards accountable are conducted to improve the flow of information and to increase the efficiency of the Boards" (Participant 9).
14	Risk Reporting: Accuracy	"The board and senior management should give special attention to the quality, completeness and accuracy of the data used to make risk decisions" (BCBS, 2017).	"The accuracy of the information is dependent on the reports from the system but every monthly we have a key performance indicator dashboard that is used to check the information. We also do spot check twice a year. On a monthly basis there is also information checks that is sent to the Deputy Finance Manager" (Participant 8).	"It's already verified against various categories or parameters. Information that is more anecdotal that comes from individual students or individual staff members that tends to take a narrative form and I know that staff if they bring a problem will first do so usually verbally, so they'll try and describe a problem to you or describe a situation to you" (Participant 9).	"Information relies on us accurately inputting it into the system. The process is manual and human based and it is a big risk. For example, student academic records require some courses to be completed before progressing to the next level" (Participant 11).
15	Risk Reporting: Clarity and Usefulness	"Risk management reports should communicate information in a clear and concise manner. Reports should be easy to understand yet comprehensive enough to facilitate informed decision-making. Reports should include an appropriate balance between risk data, analysis and interpretation, and qualitative explanations. Reports should include meaningful information tailored to the needs of the recipients"(BCBS, 2013).	The report provides information required to make decisions, but there is no guarantee that the decision will be the right one" (Participant 8).	"Before I present my reports, the Executive Director has already seen it and would have been briefed and she would know which departments are spending or not spending" (Participant 11).	"Information must be presented for a particular audience or it will be just for noting. It is therefore important to project information in a way that highlight the key issues so that they can apply their minds and engage" (Participant 12).
16	Risk Reporting: Comprehensiveness	"Reports should be easy to understand yet comprehensive enough to facilitate informed decision-making. Reports should include an appropriate balance between risk data, analysis and	"Staff try and describe a problem or situation to you, and the response to that is usually go away and write down a motivation or an account of what is happening so that you can start to tease out the various factors and you	"There is active engagement with all parties to ensure that information is comprehensive and the key performance indicator serves as a guide for providing all the necessary information. I cannot consider the	"We do provide sometimes circulars that are 100 pages long and I know my audience does not read everything" (Participant 12).

Codes		Extracts from the literature		Participants' interview quotes	
No.			Participants' quotes	Participants' quotes	Participants' quotes
		interpretation, and qualitative explanations" (BCBS, 2012).	can start to identify what the problem is through the players are what the time frames are" (Participant 3).	report complete before seeing the KPI reports" (Participant 7).	
17	Risk Reporting: Distribution	"Ensuring that the adequate people or groups receive the appropriate risk reports. Procedures should be in place to allow for rapid collection and analysis of risk data and timely dissemination of reports to all appropriate recipients. This should be balanced with the need to ensure confidentiality as appropriate" (BCBS, 2013).	"Any report that I want to share I have to, it's my practice, to get the approval of the Dean. Some reports do go to funders. For research, its limited to those that need to get to the report because it's very confidential information that time, so it's not widely distributed" (Participant 4).	"Staff are informed through formalised governance committees where the decisions are taken. We also have a Dean's Circular for all formal decisions and for general information we have a Dean's Desk and Informail that come out once in every two weeks that is distributed to staff in the Faculty" (Participant 5).	"We do monthly reporting to all stakeholder in the director forum and quarterly reporting. There are also ad hoc reports which I will share monthly with the relevant stakeholders" (Participant 9).
18	Risk Reporting Frequency	"Frequency requirements should reflect the needs of the recipients, the nature of the risk reported, and the speed, at which the risk can change, as well as the importance of reports in contributing to sound risk management and effective and efficient decision-making" (BCBS, 2013).	"We have a set general staff meeting for every Monday morning set for 3 hours and every second Monday we have a Dean's Advisory Committee meeting every second Monday where all the key issues are discussed" (Participant 4).	"The meeting happens on a Monday play. Agenda goes out by a private, so I know by Friday morning I've got to get a whole lot of reports through to the Dean's assistant. And those reports that I get through" (Participant 5).	"Monthly reports are sent to the Dean about the GOB and any ad hoc requests. With monthly reports, the quarterly report is sent to Central Finance and Deputy Deans" (Participant 4).
19	Risk Management	"Risk Management must be embedded in the organisation's ways of working"(Delloite, 2009).	"There are very set structures in which matters are escalated to the relevant staff" (Participant 4).	"The Dean and Deputy Dean does talk to me often and raise concerns about risks as it has an impact on the integrity of what we do. There is also a forum for raising these issues" (Participant 6).	"To deal with strategic and operational issues. I think in terms of our governance process, they better than they used to be, we so we still have some issues with the international office" (Participant 2).
20	Risk Reporting Challenges	"One of the challenges for any international company is to design an effective Enterprise Risk Management (ERM) program that is common across all of its global businesses, yet is flexible enough to work in different environments" (Boyd, Moolman, & Nwosu, 2016).	"There are so many parts of its operation that have not been in sync with the University and it impacts on me significantly in the way I have to run academic admin and lots of times I feel so non-aligned and trying to get into space" (Participant 5).	"We do not get involved in academic matters as the academics will say you have no part in this this is academic matters and they will deal with this, but invariably they do not" (Participant 8).	"In a perfect world, data should be captured once and that information should be in flow through the various systems and hoping that the University can get there in the foreseeable future" (Participant 10).

4.2 Four themes identified in the study

The researcher provides here an indication of the level of agreement between the themes identified from the literature, and the interview data based on responses from the middle management of the institution under study.

Table 7 is an interpretation of scores on the 5-point scale. A five-point scale is employed to describe the comparative analysis between the participants' responses and the literature. In determining the score, the total for every participant was added up and divided by 60 (the maximum attainable score from 12 participants on a 5-point scale), then multiplied by a 100 to get a percentage score. Each response is presented as a percentage. The 5-point scale employed in this study should be interpreted as indicated in Table 7.

Table 7: Interpretation of scores on the 5-point scale

Score	Interpretation
1	Code is not at all aligned to the literature.
2	Code has low alignment to the literature.
3	Code has moderate alignment to the literature.
4	Code has high alignment to the literature.
5	Code is completely aligned to the literature.

The four themes were scored as shown in Tables 7–11 and are individually discussed beginning with the risk framework, governance, and management theme. The discussion below provides more details about these themes and the alignment to best practice literature.

Table 8 provides the risk framework, governance, and management theme. Four codes are linked to this theme.

Table 8: Theme 1: Risk framework, governance, and management

No.	Risk Culture Codes and Sub-themes	P1	P2	P3	P4	P5	P6	P7	P8	P9	P10	P11	P12	Aggregate response	Percentage agreement
1	Good/sound corporate culture and governance	2	2	3	3	4	3	3	2	2	3	3	4	3	57
2	Leadership and tone from the top	3	4	4	4	3	2	3	2	3	5	4	4	3	68
3	Clear lines of accountability	3	2	3	4	4	4	4	4	5	4	4	5	4	77
4	Oversight and management from the governance structure	2	1	3	2	3	3	3	4	3	4	3	3	3	57

A sound risk management process, system and governance structure relies on proper management information systems and management structures within the organisation. In relation to this theme, the levels of agreement were as follows: the code dealing with clear lines of accountability (77%), followed by leadership and tone from the top (68%). The other two codes – good/sound corporate culture and governance oversight, and management from the governance structure – each scored (57%). There is therefore a good level of agreement between the participants' responses and literature.

Table 9 represents the second theme, risk reporting systems, practices, and communication. The three codes related to this theme are effective communication lines, internal decision making, and risk opportunity.

Table 9: Theme 2: Risk reporting systems, practices, and communication

No.	Risk Culture Codes and Sub-themes	P1	P2	P3	P4	P5	P6	P7	P8	P9	P10	P11	P12	Aggregate response	Percentage agreement
5	Effective communication lines	3	2	3	1	3	2	3	3	3	3	3	2	3	52
6	Internal decision-making	1	3	3	3	2	3	4	3	3	2	1	3	3	52
7	Risk opportunity	1	3	2	3	2	1	1	3	2	3	2	3	2	43

The interview responses showed a level of agreement of 52% for both effective communication lines, and internal decision-making. However, the level of agreement with risk opportunity was only 43%, which showed the lowest agreement with the literature. The level of agreement with the quotes (in theme 2) indicates moderate alignment with the literature. However, more concerning is that the participants' responses do not show preparedness to turn risk into an opportunity.

Table 10 shows Theme 3, risk data and quality indicators, which relates to the extent to which information necessary for decision-making is provided within the organisation.

Table 10: Theme 3: Risk data and quality indicators

No.	Risk Culture Codes and Sub-themes	P1	P2	P3	P4	P5	P6	P7	P8	P9	P10	P11	P12	Aggregate response	Percentage agreement
8	Risk Data, Governance and Assurance	3	1	3	1	3	3	4	3	3	3	2	3	3	53
9	Risk Data: Accuracy and Integrity	4	4	3	3	3	5	4	3	3	2	3	2	3	65
10	Risk Data: Adaptability	2	1	2	2	3	3	2	3	2	3	3	3	2	48
11	Risk Data: Completeness	3	3	4	3	4	2	3	3	2	3	3	2	3	58
12	Risk Data: Timeliness	2	3	2	4	3	3	3	2	3	3	4	3	3	58

Five codes are linked to this theme. Levels of agreement were as follows: Risk Data: Accuracy and Integrity 65%, followed by two codes, Risk Data: Completeness, and Risk Data: Timeliness at 58% each. The Risk Data: Governance and Assurance level of agreement was at 53%. Only Risk Data: Adaptability was under 50%, with a level of agreement at 48%. Of all the codes, the risk data adaptability, showed the lowest level of alignment with the literature.

Table 11 covers Theme 4, risk reporting practices, and captures ongoing practices in any organisation as related to risk reporting indicators and customs or habits. A total of eight codes were identified.

Table 11: Theme 4: Risk reporting practices

No.	Risk Culture Codes and Sub-themes	P1	P2	P3	P4	P5	P6	P7	P8	P9	P10	P11	P12	Aggregate response	Percentage agreement
13	Risk Reporting: Governance and Assurance	2	3	3	3	4	2	4	3	3	3	3	4	3	62
14	Risk Reporting: Accuracy	3	4	3	3	4	2	3	2	3	2	3	3	3	58
15	Risk Reporting: Clarity and Usefulness	3	2	3	2	3	4	2	4	5	2	3	3	3	60
16	Risk Reporting: Comprehensiveness	4	3	1	3	4	3	4	3	3	3	4	3	3	63
17	Risk Reporting: Distribution	3	2	3	3	3	4	3	3	4	5	5	4	4	70
18	Risk Reporting: Frequency	2	3	3	4	5	3	4	3	4	3	3	3	3	67
19	Risk Management	3	4	3	5	5	4	2	3	4	3	4	3	2	75
20	Risk Reporting Challenges	2	3	3	3	2	3	2	4	3	4	4	4	3	63

Risk management showed the highest agreement level with a score of 75%, followed by Risk Reporting: Distribution at 70%, and Risk Reporting: Frequency at 67%. Both Risk Reporting

Challenges, and Reporting: Comprehensiveness showed levels of agreement of 63%. Risk Reporting: Governance and Assurance level of agreement was 62%. Risk Reporting: Clarity and Usefulness had an agreement level of 60% and, finally, Risk Reporting: Accuracy showed the lowest agreement at 58%. A successful, and robust risk reporting culture requires that the above codes be in place and effective.

4.2.1 Overall indication of the level of agreement between the literature and the respondents

Overall, there was good alignment between risk reporting best practices derived from the literature and risk reporting practices in the institution under study. This research was undertaken during the 2020 COVID-19 pandemic, which had a big impact on higher education institutions' ability to deliver on their mandate. The institution under study managed to change its mode of teaching from contact (mass class learning) to online remote teaching before the national lockdown and still managed to complete the academic year. This demonstrated the organisation's risk management resilience. This ability to change its delivery mode within a relatively short period of time was a credit to the organisation's risk management's processes and systems. It was therefore encouraging that, across several indicators, the institution showed a moderate to high level of alignment to good principles in risk reporting, matching the call by the BCBS (2015) that "information should be communicated to the board and senior management in a timely, accurate and understandable manner so that they are equipped to take informed decisions".

While ensuring that the council and senior management are sufficiently informed, middle management and those responsible for the risk management function should avoid large information that can make it difficult to identify key issues. The effectiveness of the communication is key. Banking regulators, for instance, found that several corporate failures have been related to poor communication among the different levels, with the result that roles and responsibilities of the different authorities were never fully understood (Agarwal & Kallapur, 2018).

5. Conclusion

This study explored the risk reporting culture according to middle management in a South African public higher education institution. The focus was on internal risk reporting. Even though the principles of risk reporting in the literature have been geared towards corporate organisations, the findings of the present study show overall alignment between the literature and the reporting practices in the higher education institution under study.

Ongoing communication about risk issues, including, the organisation's risk strategy, is a central element of a strong risk culture. Consulting-house documents were found to provide the best sources of information for comparison purposes. This means that the principles and terminology used in this study were aligned to those used in corporate organisations. Given the scarcity of

academic literature on the topic and the broader relevance of these terms and principles, such documents can be useful for building the academic literature further. In terms of the institution that was studied, most of the codes used showed results that consistently aligned with the literature (that is, with few exceptions, above 50%). Overall, the institution appeared to follow the risk reporting best practices that have been described in the literature.

5.1 Limitations

The researcher is aware that the limited number of participants interviewed was not representative and that therefore the conclusions drawn from the research cannot be generalised to the entire higher education institution under study. Despite this fact, the participants provided important insights on the role of middle management in the higher education institution in question. The timing of the study also coincided with key budget processes and deadlines for some of the participants, which meant that they had time pressures with which to contend. Undertaking the research during the devastating COVID-19 pandemic, with staff working remotely, meant there was also a high degree of video fatigue among some participants. Finally, the phrasing of the questions and terminology used was drawn from the literature rather than being aligned to management language commonly used every day in higher education institutions. This meant that descriptions of the principles and wording initially used proved somewhat challenging to all but one participant and had to be modified and explained to solicit relevant responses.

5.2 Considerations for future research

The question remains whether South Africa's public higher education institutions require sector-specific guidelines on risk reporting as an administrative contribution to their risk culture. It is the researcher's recommendation that developing guidelines on internal risk reporting would ensure better understanding of risk reporting and across public higher education institutions. This could be done nationally by the Department of Higher Education and Training, which is responsible for the oversight of all these institutions. By completing its academic programme online without compromising the quality of its offering, the institution studied here demonstrated its resilience and proactive risk management. It also showed that adhering to risk reporting practices may not be as daunting as feared. Literature on risk reporting from corporate and consultant reports was deemed by the researcher to be the most useful for risk reporting. Academics and researcher could use such information in ways that ensure it can be developed further to meet the highest scholarly standards.

Number of words

Abstract: 256 (max: 300 words)

Article: 10 420 (including tables, but excluding abstract and references)

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This was not an easy journey. There is not a great deal of academic literature on the topic of risk reporting but a great deal of information covering this topic was available from corporate documents and consultant reports. I therefore spent a considerable amount of time and effort sourcing the appropriate academic literature to support the literature review. Deciding on which participants' quotations to use also proved difficult, as extracts without context had to be provided. In addition, there were challenges with collecting data. Some interviews had to be rescheduled given that South Africa was during the devastating COVID-19 pandemic which had an impact on participants either directly or indirectly. Some had family members and loved ones either testing positive for the virus or even succumbing to the virus. Two of the participants indicated that they had tested positive during this period. Despite the difficult circumstances, however, it was possible to engage with participants in a very meaningful way and to get the necessary data to ensure completion of the study. I am grateful to all those who took the time to be interviewed. Many were concerned about their responses not being good enough or not understanding the terminology in risk management, but their responses showed that the baseline understanding of risk management was there and was part of their daily operations.

The patience, support and encouragement from my supervisor was second to none. Not only did he guide me in shaping how the information should be presented but he seemed to always make it easy for me. When I had information that was overly congested and too much for 8 000 words mini-dissertation, he managed to guide me in shaping it into concise pieces of information. I remain grateful for his guidance and supervision. My work responsibilities almost doubled with committees and task teams set up to ensure that my organisation completed the academic year during the pandemic crisis, so having to work on the mini-dissertation was very challenging but being afforded the opportunity to submit later ensured that I was able to complete this important project. The support from my family and classmates was also helpful during a period when I was either overwhelmed or unsure about the next step forward. The so-called "family meetings" (addressed by President Ramaphosa) about the continued country's lockdown provided an opportunity to engage with participants and engage on matters of national importance before the recorded interviews, which served as an important icebreaker and allowed for some humour before the interviews began. The support of my line manager is much appreciated.

APPENDICES

APPENDIX A

MCOM APPLIED RISK MANAGEMENT UARM873 MINI- DISSERTATION STUDY INTERVIEW INFORMED CONSENT FORM

Study title: The risk reporting culture of middle management in a South African public higher education institution

Student: Peter Shai Makgoba (also called ‘the researcher’ in this form)

Study supervisor: Dr Emmanuel Mulambya

Supervisor contact details: 083 638 0430 and Emmanuel.Mulambya@nwu.ac.za

Document aim

The aim of this document is to provide potential interview study participants the opportunity to give formal informed consent to participate in this study.

Why this interview?

This is an academic study at master’s degree level, which provides the student the opportunity to learn how to do an interview-based study, while obtaining data expected to be useful for your organisation.

Informed consent process

The interviewer will obtain written consent from participants before setting up the interviews. Written consent is given by completing and signing this form.

Permission to do this study

University of Cape Town has provided formal permission for this study to be conducted. This study has been approved by the North-West University Faculty of Economic and Management Sciences Research Ethics Committee (EMS-REC.) Ethics clearance number is NWU-00710-20-A4.

Study aim

The concept of risk reporting in higher education institutions does not seem to be adequately covered in the academic literature, both internationally and nationally and it appears that academic literature on risk culture focuses mainly on the financial services sector. However, none of the reviewed literature focused on the responsibility of middle management in risk reporting. Middle management employees are essential in translating organisational strategic objectives into daily operational responsibilities in these institutions. It is therefore important to understand the risk reporting culture of middle management in South African public higher education institutions.

The primary research question of this study is how does the risk reporting culture of middle management in a South African public higher education institution compared to good reporting practices in the literature? The objective of this study is to explore the risk reporting culture of middle management in a South African public higher education institution compared to good reporting practices recommended by the literature.

Why have you been invited to take part?

The faculty manager and finance manager are amongst the key officials in the operations of higher education institutions with both involved in the administrative, operational, and academic decision-making processes. This position makes both the finance and faculty managers the officials with in-depth knowledge of key aspects of the University's operations, plans and execution strategy. Also being part of the Dean's management structure means you are consulted directly and indirectly in the management of the risks in the faculty and the reporting thereof. Purposeful sampling has been used for the study with all participants selected based on the position they hold. You also play a part in the preparation of reports that guides in the faculty's management.

Interview process – what to expect from the interview

The scheduled interview using Microsoft Team will last no more than 30 minutes. I may request more information from you post interview if necessary for clarifying study data. However, I shall endeavour to keep post-interview follow-up questions to a minimum. The interviews will be run in a semi-structured manner, meaning that I shall ask a set of open-ended questions and may ask additional questions to clarify my understanding of your response. I need to video record/audio record the interview to allow me to transcribe and analyse your responses post-interview. This will allow me to give full attention to your responses during the interview and not get side-tracked by multiple notetaking. I therefore kindly request that you consent to such audiotaping based on the requirement that the recordings be deleted after transcribing (see Study data management).

Study data management

The audio-recordings will be deleted after the information has been transcribed by the researcher or transcriber. If a separate (i.e., not the study researcher) transcriber is used, s/he will sign a confidentiality clause before transcribing (i.e., the transcriber may not talk to anybody about the study data). Neither the company, nor the interviewee will be identified in the study transcriptions. The transcriptions constitute the raw data for this study, which will be stored safely by the researcher for three years. The interview content will be analysed and reported on anonymously. Responsible members of the North-West University may be given access to the anonymised data for supervision and/or audit of the research. The researcher may wish to directly quote some of your responses in the study report, without identifying you. You will be asked to give permission for each such quote to be used.

Publication of the study results

The study will be written up as a confidential study report in the researcher's mini-dissertation. The report will be made available to the organisation in which the study was done. Post examination, the study may be published as an academic article if formal permission to do so has been received by the organisation.

Potential risks to you and the organisation in taking part in this study

The following risks are involved in taking part e.g., data leaks. To reduce any potential risks, the researcher will ensure that all audio recordings are deleted after the interviews have been transcribed. Should you have any other concerns about taking part in this study, please contact the researcher or study supervisor to discuss your concerns.

Potential benefits to you in taking part in this study

The faculties have different reporting structures, but all prepare management reports which are used by the senior leadership of the university. Considering the faculty and finance managers understanding of the University's procedures, guidelines, and operational processes it will be relatively easier to identify best practices across various faculties and provide an opportunity for more meaningful risk reporting. The study will compare the reporting practice in the various faculties with literature and make recommendations on best risk reporting practice.

Should you have concerns on this study

The interviewer has been trained to do the interview in an ethical and academically sound manner. Should you have any concerns about the interview that cannot be allayed by the researcher, either before or after the interview, you are welcome to contact the student's supervisor (contact details above) to discuss these concerns. Should you wish to further escalate your concerns, please contact the module leader, prof Hermien Zaaiman at hermien.zaaiman@nwu.ac.za (082 921 0463).

Informed consent

	Yes/No
I have read and understood this consent form.	
I have had a chance to ask the researcher questions on the study.	
These questions have been adequately answered for me to be able to provide informed consent to participate in this study.	
I understand that taking part in this study is voluntary.	
I have not been pressurised to take part in this study.	
I understand that I may exit the study at any time without being penalised or prejudiced against in any way.	
I hereby provide consent to contribute to this study under the conditions explained in this form.	

Initial each page and sign

Participant name:

Signature:

Date:

Appendix B

MCom Applied Risk Management

Uarm873 Mini-Dissertation Study

Interview Guide

Study title: The risk reporting culture of middle management in a South African public higher education institution

Student: 12192333

Study supervisor: Dr Emmanuel Mulambya

Supervisor contact details: 083 638 0430 or Emmanuel.Mulambya@nwu.ac.za

Document aim

The aim of this document is to provide a guide to the student on how s/he will be conducting the interview after obtaining informed consent from the interviewee (see MARM Interview Informed Consent Form for this study for information provided to the interviewee before the interview).

Interview process

1. Clarification of understanding of informed consent form at start of the interview process:

Thanks for agreeing to participate in this study. I appreciate your willingness to assist me with this research.

Do you have any further questions or concerns on the informed consent form that you would like to discuss before we start the interview?

- If the interviewee has questions/concerns, discuss the questions before continuing with the interview. Remind the interviewee that s/he is allowed to leave the interview at any time during the interview.
- If the interviewee does not have questions or concerns, continue with the interview.

2. Interview:

Pose the interview questions in the pre-defined sequence:

KEY INTERVIEW QUESTIONS

1. Question 1:

With reference to this institution, how do you manage the current processes for risk data in relation to the following topics? Please be detailed in your responses and provide examples where applicable?

- 1.1 Governance and assurance,
- 1.2 Accuracy and integrity,
- 1.3 Completeness,
- 1.4 Timeliness, and
- 1.5 Adaptability.

2. Question 2:

- 2.1 Do you have any other opinion on the topic of risk data which you would like to address?

3. Question 3:

With reference to this institution, how do you manage the current processes for managing risk reporting perform on the following topics?

- 3.1 Governance and assurance,
- 3.2 Accuracy,
- 3.3 Comprehensiveness,
- 3.4 Clarity and usefulness,
- 3.5 Frequency, and
- 3.6 Distribution.

4. Question 4:

- 4.1 Do you have any other opinion on the topic of risk reporting which you would like to address?

DEMOGRAPHICAL INFORMATION REQUIRED

- A. Can you please confirm your position in the faculty?
- B. What is your pay class (PC)?
- C. How long have you been employed at the University?
- D. How long have you been employed as a Finance Manager/Faculty Manager?

The demographic data is necessary to help the researcher to identify, and focus, on middle management of the institution under study.

- Facilitate the interviewee responses only when required by asking non-leading further questions:
 - Do not overdo probing questions to avoid influencing the interviewee responses.
 - Do not lead your respondent into providing information that you expect to be the answer to your research questions.
- Pre-prepare non-leading probing questions for your interview. Example questions:
 - *When you say....., what do you mean by that?*
 - *Tell me more about (referring to something the respondent said, not what you wanted him/her to say)*
 - *Please give me an example (concrete examples provide more information about the actual situation than general statements about a situation)*
 - *What does this look like in practice?*
 - *How does this happen? (note: ask 'how' rather than 'why' questions – see Harvard interview strategies document available on link listed at the end of the document)*
 - *How is this important to you?*
 - *How is this important to the organisation?*
 - *How is this important in the context of risk management (or insert a phrase related to your specific research objective) in the organisation?*
 - *If the person refers to how somebody else or a group feels about something, ask: How do you feel about this?*
 - *How does this information relate to the topic under discussion? (steer respondent back to topic when s/he digresses from the topic)*

3. Interpersonal aspects of interviews to keep in mind

Your behaviour during the interview will influence the interviewee's responses.

- **Do:**
 - Keep the possible biases and limitations of interviews in mind when designing, executing, and writing up your interviews – interview transcriptions will assist you and others to evaluate how your own expectations and natural biases may have influenced the interview data.
 - Understand the aims of your interview questions in the context of your research project.
 - Ask simple questions that will provide information related to your research objectives.
 - Pilot and practice your interview before formal data gathering so that you can see what works and what does not work.
 - Ask only one question at a time.
 - Give the person time to think about the question – stay quiet during that time.
 - Listen attentively to the interviewee.
 - Ask clarifying questions where necessary for purposes of your research.
 - Remain ethically sensitive as described in the Informed letter of consent – do not change the rules of engagement during the interview.
 - Stay warm and empathetic (not sympathetic – see under 'Don't' below) during the interview – you do not have to suddenly become a 'cold fish' during the interview.
 - Relax and enjoy the interview.

- At the end of the interview, state why you are grateful to the participant for her/his time and inputs to allow the respondent to feel appreciated for their efforts to contribute to your research question.
- **Do not:**
 - Interrupt your interviewee.
 - Convey any approval, sympathy, or disagreement, with your interviewee's comments through words or actions (e.g., avoid encouraging nods, frowns, verbal affirmations or ~~disagreements~~) – the interview is about what the person thinks, and not about how you feel about what they think.
 - Answer the question for the interviewee.
 - Do not ask questions that can be answered with one word, such as 'yes' or 'no'.
- **What if the interviewee becomes frustrated or emotional during the interview?**
 - Stay calm.
 - Do not interrupt, try to defend, comfort the interviewee, or 'fix' the situation – say as little as possible and allow the person to calm down.
 - Turn the audio-recording off if the person requests this.
 - When the person has calmed down, ask a question that acknowledges the emotion, such as *What about the situation prompted these strong emotions?*

4. Feedback to participants

In conclusion to the interview:

- Thank participants for their time and goodwill
- Ask them if they have any questions
- Ask participants if they would prefer to see the transcripts of the interviews prior to its use as part of the dissertation
- Ask participants if they want to receive feedback on the outcome of the research project
- Keep promises and provide participants with the requested information.

5. Further preparation for the interviews

Use other useful interview advice available online to prepare yourself for the interviews, e.g.:

<https://msu.edu/user/mkenedy/digitaladvisor/Research/interviewing.htm>

https://sociology.fas.harvard.edu/files/sociology/files/interview_strategies.pdf

Appendix C: Sample of Code Book

The full Excel code book is attached as a separate document

RIDC Indicator	Participant 1	Participant 2	Participant 3	Participant 4	Participant 5
Risk Data: Completeness	I provide all information necessary for management to engage and decide based on what we get from the system		You can always go back to like, let us say it is an appeal against a late registration fee. Then you can go back and look at when the students registered. What were the problems? Oh, there was load shedding at that time, so it could not meet the deadline. You know that kind of thing you can verify and sometimes you do need to exclude certain pieces of information from consideration, because you are going to take a judgment that they are not relevant because they fall outside a certain time frame, or because they do not meet the criteria for considering that issue.	You must rely on what is the end. A lot of the time we are reactive rather than proactive.	The information would come from different channels and have all the necessary details. The case is usually a handful, sometimes one or two. I would be dependent on what is recorded and what comes to my office, but we do have good records from the Deanery.

Risk Data: Timeliness	we report monthly on some aspects of the faculty and quarterly on others		The timelines tend to be specific to the issue. I think that when it comes, you know in the faculty you usually trying to deal with things within a year of registration, because there are certain statutory data returns that we need to make to government agencies, and to amend those after the facts would create problems for the audit trail.	Usually for the first, the first week of a new month. So, say I am going to use an example, so we must do a financial report as at the end of the end of July. I will not start on that report to my how I could start on that report, but I will not sign it off until I have checked that the ledger closes, which is normally around about the 7th or 8th of the next month because things could have been backlogged in the system.	This is usually detected early in the academic year; in the past years it would have taken some time for the issue to be detected. There has at times being lags and constant reminders as the Deanery is involved on so many things. There is no formal reporting back process, so it has been difficult.
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Risk Data: Adaptability	I would not like his situation where I will be sitting in auditorium for the whole day, while Stellenbosch saying by click on the button you can just accept an offer. Register online, confirm accommodation concept an offer. Register online, confirm accommodation online you know everything so it's a risk we end that you to us it was a huge risk" the fair way of representing the		We deal with appeals in terms of general rules, G-17 which says that if it is not an appeal for changing an assessment outcome, so for an appeal for readmission after academic exclusion, then it is always in terms of G-17. And the principle that applies here is that if someone has taken a decision in relation to a particular event, yeah, that person cannot hear the appeal. So, the appeal is always to another authority.	Data integrity across the University is probably an issue using various forums, and I know, um, the research office is trying to get onto a process with valid inputs. Because I mean like we all know that garbage in garbage out!	

Risk Reporting: Governance and assurance	"From time to time, if there's any approval or support that needs to take place, it must go via the deans advisory committee"	We have the faculty board that is overall responsible for governance. we also have a faculty executive committee. The executive committee is made up of all different deals and manage is in the faculty and it meets once a week. To deal with strategic and operational issues. I think in terms of our governance process, they better than they used to be, we so we still have some issues with the international office, so we deal with a lot of the international students joined degrees, partnership, and up until about a year ago. There was no documentation, no policies around.	In the various units that you are so in the international office, I would probably take it to the partnerships executive committee which is chaired by the DVC. In the faculty, I would take it through the various committees which report into the faculty board and that way you have defined what the problem is, and you have put a proposal in place that tries to deal with it consistently across all instances of that category.		We have a Dean' Exco, there's a deputy of research and there's a deputy Dean of what we call Health Services. A person who is UCT but based at the faculty, but will outreach, so we have a peculiar faculty slightly different from the rest of the faculties. We have a collaboration with the Western Cape Government of health because a huge number of our staff are conditions based at the different hospitals and
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					medical facilities.
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Risk Reporting: Accuracy			There's data that is captured in the student record system, and that of course is then verified information. It is already verified against various categories or parameters. Information that is more anecdotal that comes from individual students or individual staff members that tends to take a narrative form and I know that staff if they bring a problem will first do so usually verbally, so they'll try and describe a problem to your describe a situation to you, and the response to that is usually go away and write down a motivation or an account of what is happening so that you can start to tease out the various factors and you can start to identify what the problem is through the players are what the time frames are. You know you kind of break it down into its component parts. Once you have got that you ask for any evidence or and it has got to be documented.	So, risk is that the individuals putting in the with the inputs happen or not adequately trained or adequate finance people to identify certain things and we could risk and that is the rest of the data that we receive as output is a bit tainted.	
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Risk Reporting: Comprehensiveness			Staff try and describe a problem or situation to you, and the response to that is usually go away and write down a motivation or an account of what is happening so that you can start to tease out the various factors and you can start to identify what the problem is through the players are what the time frames are. One of our biggest, biggest problems are biggest risks now is that I cannot accurately report on the program on student enrolments over the years.	For backdating of certain things so to allow for completeness, we wait until communication comes from later, so central finance to say that either one all settlements have taken place. So that is what we use is the complete information ok and what other timelines involved? Are there any specific timelines that you must work within?	It is quite significantly done to the point that when somebody presents at an exam board for example, it is not new news, we would have known all the history pertaining to that. Of course, this confidentiality that is exercised, but we would know that that student had challenges. So, I think that's very carefully very careful planning a very well thought out plan.
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Risk Reporting: Clarity and usefulness	Three issues that are key risks include the structural issues relating to administration and set up of the faculty, postgraduate set up is also a challenge and lastly short courses are bringing a nightmare to the faculty.		If someone has taken a decision in relation to a particular event, yeah, that person cannot hear the appeal. So, the appeal is always to another authority.		A matter should have been on the radar for a while and so when they are deciding on re admission, it is usually done with absolute granularity. We must appoint a mentor. We left, you know, to put were admit somebody on probation with some very strict terms and conditions.
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