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Enterprise Risk Management (ERM) Practices of Private Higher Education Institutions in Botswana: A Critical Analysis

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Abstract

The primary objective of this study was to investigate how enterprise risk is understood and managed in private higher education institutions in Botswana. A number of authorities in the field of enterprise risk management (ERM) have consistently shown that higher education institutions in general show very little commitment to the implementation of ERM despite numerous enterprise risks these institutions fall victim to in their operations on a day to day basis. Private higher education institutions (PHEIs) are especially susceptible to a myriad of enterprise risks which include unreliable sources of revenue, low enrollments, high staff turnover, a highly regulated higher education environment, ad stiff competition for students and staff among higher education institutions among others. This paper therefore investigated how effectively private higher education institutions in Botswana are in the implementation of ERM practices with regards to how these institutions assess, respond to and monitor enterprise risk. A reviewed of some of the theoretical underpinnings of enterprise risk management including examples of best practice was done. In the final argument the paper concluded that against best practice, ERM practices of private higher education institutions are ineffective and need a thorough relook at in terms of implementation processes and procedures. The quantitative research approach that employed a questionnaire as a tool for data collection was used and also convenience sampling technique was used to select respondents from a population of board members, school advisory council, and executive management of the five private higher education institutions in Botswana.

Keywords: Risk, Enterprise risk, Enterprise risk management, private higher education, best practice, systematic risk, unsystematic risk.

1. Introduction and background

In every business enterprise, be it large or small, public or private, risk (internal and external uncertainties) is a reality of doing budiness. While in some cases and according to Thornton (2009) risk (exposure to loss or gain) may be necessary for long term operational success, failure to effectively manage it can more often than not, lead to serious concequences to a business such as damaged reputation, loss of profits, disruption of productivity or at worst, business shutdown. This therefore means that as higher education leaders develop business strategies for the 21st century, it should be important for them to recognise and continuously examine lurking enterprise risks that are not only affectig economieson a large scale but are also dealing fatal blows tomodern-day businesses as we know them (Unks, 2003; Krapfl, 2011). Higher education institutions are no longer insulated against the realities and challenges of constant change and its antescedent risks as globalisation, advances in technology, and the increasing financial sophistication are all in their own unique ways contributing to the growing number and complexity of enterprise risks in higher education (Unks, 2003; Lam, 2000, Lam, 2003; Micollis and Shah, 2000; Davenport and Bradley, 2001; Rosen and Zenios, 2001).

Traditionally, business, universities and colleges used to identify and manage enterprise risk individually and transactionally (VCU Staff, 2012). This created a silo approach to enterprise risk management that lacked coordination resulting in risks such as information technology breaches or failures, legal issues and even business shutdowns occuring with alarming regularity. Problems such as these as well as the realisation that insurance alone will not and cannot adequately resolve the enterprise risks currently facing higher education institutions, necessited a management paradigm shift towards ERM in higher education.

Ferkolj (2010) also posited that as organisations including higher education institutions continue to face an increasing number and an even greater variety of risks, there is now a growing recognition that enterprise risk must be managed with the total organisation in mind, i.e., by taking a holistic approach, which is the essence of the enterprise risk management (ERM) process. This is supported by Lam (2000) who intimated that the current increased thinking and focus by higher education institutions on ERM is being driven by external developments, internal demand as well as advances in risk management methodology. COSO (2004) also extended the above argument by positing that the complexities of business transactions, advances in technology, speed of product cycles and the overall pace of change continue, to increase the volume, variety and complexity of risks facing higher education today. More specifically, research according to Unks(2003) and also VCU Staff (2012) has shown that the following are the major drivers of enterprise risk in higher education:

- Fierce competition for faculty, students, staff and financial resources;
- Pressure for increased productivity, responsiveness, and accountability in higher education while

reducing costs;

- Increased external scrutiny from governement, the public, governng boards, media and rights groups;
- Powerful new technologies that render current technologies obsolute and require huge invetsments of both financial and human capital;
- Rapidly increasing entrepreneurial ventures beyond the traditional educational avenues of generating revenue are creating further stresses and strains on traditional administrative and financial infrastructures;
- Increased competition in the higher education marketplace is creating greater business risks; and
- Increased level of litigation in higher education in general has come with higher and higher levels of financial concequences for institutions.

By assuming a holistic and multi-dimensional perspective to risk management therefore, ERM according to Dickerson (2004) helps organisations to be able to look at and deal with the entire risk spectrum (strategic, financial, compliance, operational and reputational risks) in any higher education institution. However, while according to PricewaterCoopers (2012), research has shown that current trends in higher education enterprise risk management show that there is general acceptance and recognition of the importance of ERM in higher education institutions, the challenge is on the implementation. According to the research carried out by the Association of Governing Board (2009), higher education institutions face challenges in implementing ERM programs. Results of the research revealed the following:

- When compared to other industries, higher education lags behind in the fiduciary responsibility of effectively implementing ERM;
- 60% of higher education institutions do not use comprehensive strategic risk assessment to identify major risks to mission success;
- Less than 50% of higher education directors and other senior management engage in discussions regarding institutional risks;
- Less than 25% of board members and other senior management monitor institutional and other external activities to determine the effectiveness of their institutions' risk management efforts;
- Financial risk receives the most attention at the expense of other more threatening risks; and
- Legal/compliance is the second highest in getting attention in higher education.

Research according to UAC (2006) has also further showed that the levels of institutional approach to ERM by higher education institutions can be categorized into five levels as shown in table 1, with level I representing the poorest and level V the best approach.

| Table 1: Levels of in | nstitutional approach to ERM in higher educatio | n |
|-----------------------|---|---|
| | | |

| Level | Description |
|-------|---|
| Ι | See little value in proactive ERM. |
| II | General awareness about ERM and some conceptual appreciation for its value. |
| III | Aware of ERM and have set up mechanisms to monitor risks. |
| IV | Have created a risk management position to review "hot" spots, assist in risk assessment within business units and keep score of the risks. |
| V | ERM has fully evolved from a back office function to a CEO-level concern and is embedded in every part of the institution. Each business unit/department designs its own risk mitigation plan, tracks progress and establishes training programs. |

Source: UAC (2006)

2. Literature review

2.1. Defining risk and enterprise risk

Risk is any issue, circumstance or factor that impacts an institution's ability to meet its objectives (COSO, 2004; UAC, 2006; NIST, 2004; NACUBO, 2000). NBIMC (2011) also defines risk as the potential for loss caused by an event or series of events that can adversely affect the achievement of a company's business objectives. The current thinking on risk therefore is that it is any issue that has a potential to affect the achievement of an institution's mission. Enterprise risk therefore is any such risk as defined above that affects an enterprise. Enterprise risk can be classified into two categories namely systemic and unsystemic risk (Al-Tamimi and Al-Mazrooei, 2007). Systemic risk also referred to as systematic or undiversification risk in risk that is inherent in the entire system or institution (Al-Tamimi and Al-Mazrooei, 2007). It is called undiversification risk because even if an institution diversifies, this risk cannot be avoided. Unsystematic risk is risk associated with individual assets of an institution and can be avoided through diversification (Al-Tamimi and Al-Mazrooei, 2007).

2.2. Typology of enterprise risk in Higher education

The multiplicity of challenges facing higher education has resulted in a variety of complex risks for the

institutions (Halim, 2007). Among some of the risks facing higher education are the following (Halim, 2007; University of Vermont, 2012; UAC, 2006; Unks, 2003):

- Failure to meet established missions and objectives;
- Drop in passrate standings;
- Competitive pressure from other colleges and universities in terms of course offerings, facilities, tuition, students and qualified staff;
- Failure to sustain previous levels of fundings;
- Failure to meet enrolment targets or drop in student enrollment;
- Investment losses;
- Loss of key staff;
- Occupational hazards, injuries, etc;
- Inadequate policies and approved procedures to manage academic and non-academic processes;
- Employee misdeeds such as fraud, vandalising assets, etc;
- Demonstrations by students and staff;
- IT failure
- Project failures;
- Government/regulatory change affecting the industry; and
- Country risk.

The above typology of risks fall into five categories of risk namely strategic risk, financial risk, human resources risk, operational risk and reputational risk (Halim, 2007). Illustration 3 shows the five different categories of enterprise risk.

- *Strategic Risk:*Not meeting set mission, strategy and objectives; commpetitive pressure; from other universities; country risk;
- *Financial risk*:Drop in funding; investment losses; project failures; failure to meet enrollment figures/targets; drop in student enrollment;
- Operational Risk: Inadequate policies and procedures; occupational hazards; loss of assets;
- *HRM risk*: Poor recruitment and selection; loss of key personnel; employee misdeeds; and
- *Reputational risk*: Drop in pass rate; campus violence; and country risk.

2.3. Defining Enterprise Risk Management

Enterprise risk management (ERM) is an approach for managing and optimising risks, enabling a company/business to determine how much uncertainty and risk are acceptable to an organisation (Thornton, 2009; PRMIA, 2008; Anderson and Terp, 2006; SBP, 2003; CAS, 2003). Lam (2003) also defined ERM as an integrated framework for managing credit risk, market risk, operational risk, economic capital, and risk transfer in order to maximize firm value. ERM is further defined as a process effected by an entity's board of directors, management and other personnel, that is applied in strategy setting and across the enterprise and designed to identify and manage risk to be within its risk appetite (COSO, 2004; Lam, 2000; Makomaski, 2008; Alviunessen and Jankensgard, 2009; Best, 2008). Risk appetite is defined by Tavan (2004) as the level of aggregate risk at which the institution can successfully manage its business for an extended period of time, and can provide reasonable assurance regarding the institution's achievement of its business objectives. A more comprehensive definition of enterprise risk management is given by Texas A&M University (2009) who defined it as one that consists of the following sets of activities:

- *Identifying major organizational activities, processes, and functions* after reviewing missions, goals, and objectives, ie, categorizing and prioritizing the major activities.
- *Identifying and assessing risks and building risks portfolios*, ie, receiving input from representatives within the University then prioritizing and ranking those risks identified as to potential impact and probability of occurrence while considering the day-to-day activities to control risk.
- *Identifying risk mitigation strategies.* This includes reviewing mitigating activities performed for all risks focusing on how to deal with those risks ranked highest as well as reviewing mitigation where two or more parties (groups) are identified as responsible. This further involves evaluating the effectiveness of current mitigation and identify any gaps and also whether resources and mitigating strategies are appropriately allocated based on the level of risk and desired level of effectiveness.
- *Review the monitoring and executive management reporting.* This involves identifying who is responsible for monitoring that the mitigating activity is effectively managing the risk and being performed as planned.
- *Performing status/follow-up reviews.* This involves reviewing of executive management reporting and communication as well as assessing the efficiency and effectiveness of mitigation, monitoring, and communication.

2.4. Multi-directionality of the ERM process

ERM is viewed by Tillinghast Monograph (2002) as a multi-directional iterative process with eight components that influence one another synergistically forming part of the enterprise risk management matrix as shown below: *Analysing the internal environment:* Deals with the context within which the enterprise functions and includes the institution's reporting structure, assignment of authority, development of personnel, risk appetite, management style and ethical values as key elements of this environment. According to NACUBO (2007) internal environment defines the culture and values, i.e. the ecosystem of an institution in which all risk management activities happen.

Objectives Setting: A mission or vision is developed through the objectives set by the institution's management. Objectives are the focal point of risk strategy and define an institution's risk appetite.

Risk Identification: Both external and internal risks are considered in terms of their impact on the realization of institutional objectives hence the identification of potential risks and distinguishing between those representing loss, opportunity or a combination of both, enable effective categorization of risks into a common risk language, and further create a basis from which a portfolio instead of a segmented view of risk can be formulated. Risk identification therefore relates to the identification of internal and external events and activities that could affect an institution's ability to achieve its objectives (COSO, 2003; Tufano, 2011).

Risk Assessment: Identified risk events are evaluated in terms of their likelihood to occur and their possible impact on the institution so that management can prepare contingency measures. According to NACUBO (2007), risk assessment relates to the assessment of the impact of risk and the prioritization of those risks.

Risk response: Relates to how management of higher education institutions respond to enterprise risks in a manner aligned with the institution's objectives and risk appetite. A silo instead of a portfolio approach of managing enterprise risk only leads to ineffective enterprise risk management (Beasley and Frigo, 2007). According to COSO (2004), risk response options to an institution, depending on the business context, include the following:

- Risk avoidance strategy: Exit the activity that causes the risk;
- Risk acceptance strategy: Do nothing to alter either the likelihood or the impact of risk;
- Risk mitigating/ treating strategy: Reducing the likelihood of the risk event occurring and reducing the impact of the risk to the organisation should the risk occur by either revising the business plan, implementing management controls or implementing safety programs resulting in a new course of action (Goldman and Nieuwenhuizen, 2006; PMBOK, 2000).
- Risk reduction strategy: Reduce the likelihood and/or impact of risk often through everyday business decisions and processes; and
- Risk sharing strategy: Mitigate the impact and/or likelihood of risks by hedging or outsourcing risky activities among other strategies.

Control Activities: Risk responses should be established and executed in line with the institution's policies and procedures that comprise the control activities.

Information and communication processes and procedures: By communicating all risk policy across the organisation, management can make all employees understand their roles and responsibilities within the institution. Allowing for a two-way communication between management and employees ensures employees also provide insight into their respective areas regarding the effectiveness of risk policy and also raises awareness of risk events that may not have been addressed/adequately addressed in departments.

Monitoring: The ERM program must be dynamic enough to be able to effectively respond to ongoing risk assessment by management as well as respond to independent audit results by ensuring that monitoring is complemented by corrective action.

2.5. Importance of ERM to Higher education institutions.

The Institute of Internal Auditors (2004) identifies four important benefits of ERM in organisations such as higher education institutions as the following:

- i. Helping institutions to identify strategic risk opportunities that if undertaken, can facilitate the achievement of institutional goals;
- ii. Providing senior management with the most up-to-date information about risk that may be used in the decision-making process;
- iii. Can be used as a tool to align annual performance with risk identification and management; and
- iv. Can be used as a tool to encourage and reward upstream reporting of business risk opportunities and challenges.

2.6. Drivers of ERM in higher education

KPMG (2010) identifies three important drivers of ERM in higher education institutions as governance, strategy and performance as shown on illustration 5 below:

i. *Governance*: It relates to the monitoring and reporting by the management and the board of key risks and actions for managing risk;

- ii. *Strategy*: It relates to the realignment of business strategies by maneuvering through choices via analysis of key risks and their potential financial, operational, compliance, security impacts among others; and
- iii. *Performance*:Relates to effective utilisation of key risk indicators and insights provided by risk intelligence as a means to assist decision making and improve business performance.

2.7. Best practice in higher education ERM processes

Best practices or actions for effective management of enterprise risks in higher education include the following (NACUBO, 2000; Bekaert and Holland, 2009; Crawford and Justina, 2006; DeLoach, 2000):

- i. *Adopt a common language (communication enabler):* According to DeLoach (2000), the first stage in the successful implementation of ERM is effective communication on risk and risk management to all members of the institution;
- ii. *Designate a risk management owner*: A Chief risk officer (CRO) or a senior member of the institution must be designated for an appropriate period of time to implement the risk management program (NACUBO, 2007). The CRO should work with each business unit, leveraging its knowledge and that of its operating line individuals;
- iii. *Establish goals, objectives and oversight (strategy enabler):* Establishment of goals and objectives enables the ERM process to be effective and consistent with the overall institutional strategy (NACUBO, 2007; DeLoach, 2000; Bekaert and Holland, 2009; Tufano, 2011). This stage is meant to ensure the strategy is manageable and measurable as well as to incentivise the institution to work towards the fulfillment of the formulated strategy;
- iv. Assess risk and develop operational strategies: Ensuring that the assessment and management of enterprise risk is comprehensive, well controlled, consistent and effective is important at this stage (DeLoach, 2000). Empahsis at this stage should be on the need for tools to effectively identify, quantify and manage individual risks across the entire institution;
- v. *Design/implement capabilities:*This stage operationalises risk management activities in the institution through the design of infrastructure and performance monitoring mechanisms also reffered to DeLoach (2000) as six capabilities or six infrastructure components namely processes, people, reports, methodologies and technology. NACUBO (2007) also adds training as the seventh capability with training being used as a tool to mobilise staff. A seamless interaction of these capabilities would then make for an effective ERM;
- vi. *Continuously seek to improve:* The starting point towards continuous improvement in the ERM process is acknowledgement by all in the institution that the ERM process can be improved (DeLoach, 2000; Crawford and Justina, 2006). This acknowledgement will then incentivise improvement of the six capabilities leading eventually to an improved ERM process;
- vii. *Aggregate multiple risk measures:* In terms of the ERM, risks must be viewed holistically and then aggregated making it possible to control them by setting tolerances under which the institution's level of risk exposure must be (Lennon, 2007);
- viii. *Link to enterprise performance:* A successful ERM should result in the reduction of unacceptable risks and strategic errors, more timely corrective actions and better management of the risk profile (DeLoach, 2000; NACUBO, 2007).
- ix. *Formulate enterprise-wide risk management strategy:* The purpose of this stage is to manage enterprise risks holistically (Bekaert and Holland, 2009, DeLoach, 2000). The strategy formed at this stage will form the basis for more effective resource allocation (Lennon, 2007);
- x. *Monitoring and internal audit:* The role of internal audit is crucial in the risk management agenda, especially with regards to improving risk assessment and management practices (NACUBO, 2007; DeLoach, 2000); and
- Reinforcement through HR mechanisms: According to NACUBO (2007), HR mechanisms must be developed and deployed to establish accountability and to reward effective risk management behaviour. The use of the balanced scorecard is important as a means of compansating staff who display the right mix of risk management behaviour (NACUBO, 2007; Lennon, 2007).

3. Research Methodology and Design

3.1. Research paradigm

A research paradigm is defined as a planning framework for a research process and includes methodology to be used, assumptions and models (Neuman, 2006). Filstead in Ponterotto (2006; 2010) also defined a research paradigm as a set of interconnected assumptions about the social world which provides a philosophical and conceptual framework for an organised study of phenomenon while Ticehurst & Veal also defined a research paradigm as a research framework that provides guidelines and principles for the researcher to use. This research employed a positivist ontological paradigm. According to Henning, Van Rensburg & Smit (2004), a positivist ontological paradigm gives a description and explanation of features of reality by collecting data on observable

behaviours of a sample. It uses numerical data analysis that leads to what Hall et al (1996) call an objectivist, empirical and quantitative research approach. Also according to Henning, van Rensburg & Smit (2004), the positivist approach is concerned with uncovering truth and presenting it using numerical means.

3.2. Population and sample

The population of this study comprised of executive management members and deans of all the five the private higher education institutions in Botswana. Castillo (2009) defined a population as a well-defined collection of individuals or objects that have similar characteristics that form the focus of a study. Convenience or purposive sampling was used to select respondents to the study. McMillan and Schumacher (1993) define convenient sampling as a non-random sampling technique in which subjects are selected on the basis of the convenient accessibility and proximity to the researcher while Given (2008) defines convenient sampling as a procedure in which a researcher selects subjects based on their expertise in the area under research. Twenty subjects from the population of executive board members, school advisory council members, and executive management members, ensuring that from each of the five institutions four members were selected for the study.

3.3. Data collection instruments

3.3.1. Questionnaire

A questionnaire was used for data collection and is defined by Given (2008) as a tool for collecting data from respondents that consists of a series of verbal or written questions.

3.4. Data analysis and procedure

All the quantitative data obtained from the study was processed and analysed using the SPSS software package.

4. Results

4.1. Analysis and discussion of results

Analysis and discussion of results was done in relation to five themes namely risk identification; risk assessment; risk response; information and communication; and monitoring.

4.1.1. Risk identification

According to 70% of the respondents, PHEIs do not have clearly articulated, systematic and on-going risk identification processes and 60% of the same respondents were of the view that risk identification at PHEIs is not enterprise-wide. 72% of the respondents also felt that risk identification at the PHEIs do not cover all types of business objectives that include strategic, operational, compliance and reporting objectives. With regards to linking business risks with business objectives, 76% of respondents also felt that business risks at PHEIs are not always linked to business objectives. The above scenario points to the fact that risk identification in PHEIs is done piece-meal and also that there is no link between risk identification and business objectives in PHEIs.

4.1.2. Risk assessment

56% of the respondents felt that PHEIs do not prioritise material risk during risk assessments in PHEIs while 80% of the same respondents felt that material risks are not always immediately reported to management for action to be immediately taken. This perhaps may be due to poor communication processes and procedures in these institutions. 64% of respondents felt that reported risks are not always documented for future reference but are just acted upon and case closed. 76% of respondents also believed that risk reports and assessments that are received by management of the institutions are mostly rejected as false alarms to save money by not acting on them instead of endorsing and acting on them. The above information shows that risk assessment as a process, is not taken seriously in PHEIs. Also documentation of assessed risks is very poor in these institutions making it difficult for these institutions to effectively prioritise and see which risks need to be immediately acted upon and how and which ones can be ignored. This shortcoming is against best practice which demands that the assessment and management of enterprise risk should be comprehensive, well controlled, consistent and effective (DeLoach, 2000).

4.1.3. Risk response

78% of the respondents the majority of identified enterprise risks are managed through avoidance rather than using other alternative risk management strategies such as transferring, sharing, reducing and acceptance. This situation may mean either a lack of understanding of effective risk response strategies or inability to create a seamless interaction between risk management capabilities in line with best practice as given by DeLoach (2000) and NACUBO (2007).

4.1.4. Information and communication

80% of respondents felt that information and communication processes of PHEIs with regards to issues of enterprise risk management are inadequate ad ineffective while 72% of same respondents felt that the communication methods of PHEIs during times of enterprise risk emergencies are inefficient, unclear and slow. 64% of respondents felt that PHEIs do not have clear methods of receiving and communicating employee and other stakeholder suggestions and grievances to executive management. 76% of respondents believed that PHEIs do not have effective risk-dependence relationships with third party providers or suppliers to ensure reliable supply or provision of needed materials and other essentials. The statistics above therefore show that there are

ineffective communication processes in PHEIs to be able to successfully manage enterprise risk and this goes against best practice according to DeLoach (2000) on effective communication with regards to risk and risk management to all members of the institution. According to DeLoach (2000), effective communication about enterprise risk develops a common language and understanding on enterprise risk resulting in a more effective risk management process in PHEIs.

4.1.5. Monitoring

Only 48% of respondents felt that PHEIs evaluate the status of their internal controls on an annual basis and give up-to-date and correct assessments of enterprise risk management efforts while only 28% of the same respondents felt that PHEIs evaluate annually the reports from external auditors and make necessary action plans to manage enterprise risks. This statistics show that enterprise risk monitoring mechanisms of PHEIs are very weak and ineffective especially because these institutions have not appointed risk management owners (chief risk officers) as demanded by best practice and as proposed by NACUBO (2007).

5. Conclusions and Recommendations

5.1. Major findings and conclusion:

The major findings of this paper are as follows:

- PHEIS do not have clearly and adequately articulated and communicated enterprise risk management policies and strategies to effectively manager enterprise risk.
- PHEIs do not have effective and systematic enterprise risk identification and assessment procedures to be able to appropriately prioritise risks in terms of their potential effect to the institutions and how they should be treated.
- There is no risk ownership in PHEIs as these institutions do not have dedicated people (chief risk officers) to ensure they take ownership of enterprise risks and be able to come up with timely, integrated, systematic and comprehensive risk management processes and procedures in these institutions.
- As a result of ineffective communication processes in these institutions, employees and other important stakeholders are left out of the enterprise risk management equation and this leads to a gap in the effective management of enterprise as employees and stakeholders such as suppliers are the people on the ground to quickly spot any lurking enterprise risks before disaster strikes.

From the above major findings therefore it can be concluded that enterprise risk management processes of PHEIs are ineffective and leave PHEIs open to attack by various enterprise risks.

5.2. Recommendations

In the light of the above major findings and conclusion, the following recommendations suffice:

- Separation of management duties: All these PHEIs are family-owned and managed and there seems lack of a family entity and business entity that needs to be professionally run. Separation therefore between management of a business and management of a family entity needs to be done immediately to ensure these institutions are more professionally run and issues of sound governance are taken into consideration especially as they relate to enterprise risks.
- *Two way communication:* Managements teams of PHEIs must set up effective two way communication channels and also ensure all stakeholders are involved in decision-making at their various levels to ensure everybody understand the risk management agenda of the institutions and more importantly, to ensure everyone in these institutions take ownerships of risk management processes designed.
- *Creating an independent risk function:* PHEIs should create independent risk functions for checks and balances on the enterprise risk management programs and processes of the institutions. This to be complemented by having a chief risk officer appointed at each of the institutions to take ownership of enterprise risk procedures and processes.
- Allowing for and acting on periodic internal and external enterprise risk audits: Internal enterprise risk management controls at PHEIs need to be tightened by ensuring that internal and external risk audits are always and timely acted upon in line with the given assessments and recommendations.

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