

ENTERPRISE RISK MANAGEMENT POLICY

(COMMUNITY POLICY)

1. Scope

The Enterprise Risk Management Policy (this 'Policy') applies to all Councillors, employees, contractors and volunteers engaged in the provision of Council services or the management of Council facilities and assets unless expressly excluded and outlines the expectations and processes for managing risk.

2. Purpose

The purpose of this Policy is to communicate Council's commitment to managing enterprisewide risks and establish clear responsibilities to ensure that all levels of Council, management and staff adopt sound risk management practices and procedures.

The embedding of the risk management framework into strategic and operational processes supports the organisation to make informed decisions for the benefit of Council and the community.

3. References (legislation/related documents)

Legislative reference

Crime and Corruption Act 2001
Financial Accountability Act 2009
Local Government Act 2009
Local Government Regulations 2012
Work Health & Safety Act 2011
Work Health & Safety Regulation 2011

Related documents

AS/NZS ISO 31000:2018 Risk Management – Principles and Guidelines Code of Practice (2021) – How to manage work health and safety risks Corporate Plan Enterprise Risk Management Procedure Operational Plan Operational Risk Register Strategic Risk Register Workplace Health and Safety Queensland

4. Definitions

To assist in interpretation, the following definitions shall apply:

Controls Assurance	'A positive declaration intended to give confidence' or 'the state of being sure or certain about something'. Controls assurance is the process by which management collectively provides accurate and current information to the stakeholders about the efficiency and
	effectiveness of controls.

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Council	Livingstone Shire Council.	
Councillor/s	The Mayor and Councillors of Livingstone Shire Council, within the meaning of the <i>Local Government Act 2009</i> .	
Employee	Local government employee: (a) The Chief Executive Officer; or (b) A person holding an appointment under section 196 of the Local Government Act 2009.	
Enterprise Risk Management	Council's approach encompassing strategy, processes, culture, technology, standards, and knowledge in identifying, analysing, evaluating, managing, treating, reviewing, and communicating uncertainties the organisation encounters.	
Executive Leadership Team	The Executive Leadership Team consists of the Chief Executive Officer, General Managers and Chief Officers.	
Internal Controls	A process effected by an entity's board of directors, management and other personnel, designed to provide reasonable assurance regarding the achievement of objectives relating to operations, reporting and compliance. Internal Control Management provides an approach to assist managers to identify and implement internal controls and then monitor and assess the effectiveness of those controls.	
Risk	Effect of uncertainty on objectives. The level of risk is expressed in terms of the combination of consequences and their likelihood.	
Risk Appetite	The amount of risk Council, as an organisation, is willing to accept in pursuit of its objectives.	
Risk Capacity	The amount and type of risk Council is able to support in pursuit of its business objectives.	
Risk Management	Risk management for Council refers to the culture, processes and structures developed to effectively manage potential opportunities and adverse effects for any activity, function or process undertaken by the Council.	
Risk Tolerance	Council's readiness to bear the risk, after risk treatment, in order to achieve its objectives.	

5. Policy Statement

Council recognises that effective management of risk is part of good leadership and governance and is fundamental to protecting the value that Council generates for the community of Livingstone Shire as it works to achieve its vision and corporate objectives.

Council will foster the embedding and maintenance of a strong risk aware culture where risk is considered a part of normal business activity and that risks are managed consistently and systematically within a context of regulatory obligations, competing resources, and financial and community priorities.

Council is committed to proactively identifying current and emerging risks through ongoing monitoring and reporting and managing risks through controls aligned to Council's current risk appetite.

Council will adopt an enterprise-wide approach to the management of risk that is fit-forpurpose and aligns with the principles outlined in AS/NZS ISO 31000:2018 Risk Management Guidelines. The formal, structured approach supports a framework consisting of:

this Policy;

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- the Enterprise Risk Management Procedure;
- tools and templates (such as the Strategic and Operational Risk Registers);
- Council's approved risk management software systems (including project management software that supports the assessment of significant project risks and capital investment decisions);
- complimentary/supporting policies (such as fraud prevention, business continuity management, work health and safety management, and code of conduct);
- allocation of risk management responsibilities through relevant position descriptions;
- monitoring effectiveness of controls by Council's Executive Leadership Team;
- monitoring the risk management framework, financial reporting processes, compliance processes and internal audit performance by the Audit, Risk & Improvement Committee.

5.1. Types of Risk

Risk Type	Description	
Strategic Risks	Organisation-wide risks which may impact on Council's ability to delive on its vision and strategic objectives as stated in the Corporate Plan Strategic risks may also represent the effect of uncertainty on objectives associated with the sustainability of Council.	
Operational Risks	Risks that may impact on Council's ability to function effectively and deliver its services and programs as stated in the Operational Plan or other operational objectives.	
Project Risks	Risks Risk that may impact on Council's ability to deliver a particular project initiative or event as stated in the Budget and Capital Works Program.	

5.2 Risk Management Principles

The application of this Policy is defined, guided and supported by the following best practice principles as outlined within the Australian Standard ISO 31000:2018. Risk management:

- <u>Creates and protects value</u> by contributing to the achievement of objectives and improvement of business performance.
- <u>Is an integral part of all organisational processes</u> by it not being a stand-alone activity that is separate from the main activities and processes of Council.
- <u>Is part of decision making</u> and assists decision makers made informed choices, prioritise actions and distinguish among alternative courses of action.
- Explicitly addresses uncertainty and the nature of that uncertainty, and how it can be addressed.
- <u>Is systemic, structured and timely</u> by contributing to efficiency and to consistent, comparable and reliable results.
- <u>Is based on the best available information</u> and the inputs to the process of managing risk are based on multiple information sources (such as historical data, experience, stakeholder feedback, observation, forecasts and expert judgement).
- <u>Is tailored to the organisation</u> by aligning existing processes.
- <u>Takes human and cultural factors into account</u> by recognising the capabilities, perceptions and intentions of external and internal people that can facilitate or hinder achievement of Council's objectives.
- <u>Is transparent and inclusive</u> by the timely involvement of stakeholders and, in particular, decision makers at all levels of Council.
- Is dynamic, iterative and responsive to change by continually responding to change.
- <u>Facilitates continual improvement of the organisation</u> by identifying, developing and implementing strategies to improve risk management maturity across Council.

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Adherence to these principles enables Council to leverage opportunities, manage the effects of uncertainty on its activities and safeguard the community, the environment, property, resources and Council's reputation.

5.3 Risk Appetite

Risk appetite is the amount and type of risk that Council is prepared to tolerate or accept in the pursuit of its objectives. It is expressed in the form of a risk appetite statement which covers a number of critical risk categories.

Council generally has no appetite for risks which are assessed as Extreme or High as defined in the related Enterprise Risk Management Procedure. In particular, Council has no appetite for risks which will:

- have a significant negative impact on Council's long term financial sustainability, result in major breaches of legislative requirements and/or significant successful litigation against Council;
- 2) compromise the safety and welfare of employees, Councillors, contractors, volunteers and/or members of the community;
- 3) cause significant and irreparable damage to the environment;
- result in major disruption to the delivery of key Council services;
- 5) result in widespread and sustained damage to Council's reputation; and
- 6) have a significant impact on Council's ability to recruit and retain staff.

It must be noted that Council provides a large and diverse range of services to a large and diverse population. In order to provide these services Council must accept and take some level of risk. Council therefore has a moderate appetite for risks which need to be taken in order to:

- improve efficiency, reduce costs and/or generate additional sources of income; and
- maintain and, where necessary, improve levels of service to the community.

The level of risk that is acceptable to Council will be assessed and determined on a case-bycase basis. 'Appendix A - Risk Appetite Statement' provides an overall expression of Council's risk appetite.

5.4 Roles and Responsibilities

The elected Council is responsible for approval of this Policy and revising Council's risk appetite.

The Chief Executive Officer has ultimate responsibility and accountability for risk management within Council and drives the risk management culture.

Council's Executive Leadership Team is responsible for ensuring that employees are implementing the framework as intended and performing their risk management responsibilities.

The Risk & Governance Officer is responsible for the operational activities required to implement the framework and provide specialist risk management skills and knowledge including training and awareness of staff with respect to risk management principles and organisational approach.

It is the responsibility of all Council employees, contractors, and volunteers to properly apply Council's risk management processes and procedures and to support the identification and improvement of risk management within the organisation.

The Audit, Risk & Improvement Committee (ARaIC) will provide governance oversight for the management of risk in accordance with the ARaIC Charter.

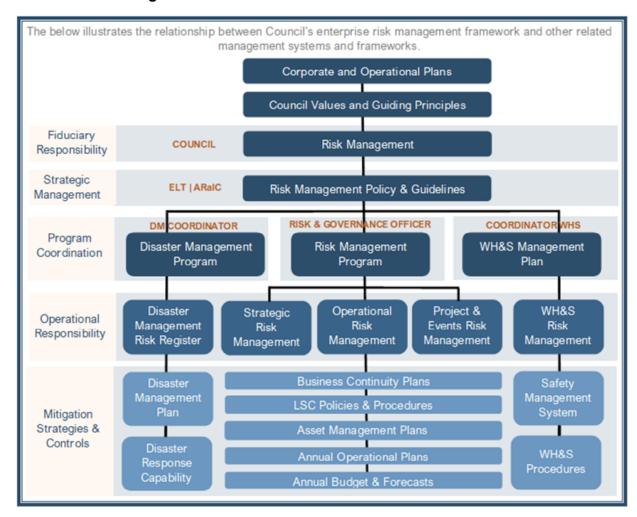
Council's *Enterprise Risk Management Procedure* outlines in detail all roles and responsibilities associated with managing risk within the organisation.

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Risk management accountabilities are also included in position descriptions, performance planning and business planning documentation.

5.5 Framework Alignment



6. Changes to this Policy

This Policy will be reviewed within 12 months of a new term of Council or more frequently in the event of any material changes in circumstances.

7. Repeals/Amendments

This Policy repeals the Livingstone Shire Council Policy titled 'Enterprise Risk Management Policy (v2.1)'.

Version	Date	Action
1	22/09/2015	Adopted
2	03/10/2017	Amended Policy Adopted
2.1	27/08/2018	Administrative Amendments - reflect organisational restructure
3.0	20/02/2024	Adopted - full revision as part of the Risk Management Maturity Advancement Project 2021-24

CALE DENDLE CHIEF EXECUTIVE OFFICER

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Appendix A - Risk Appetite Statement

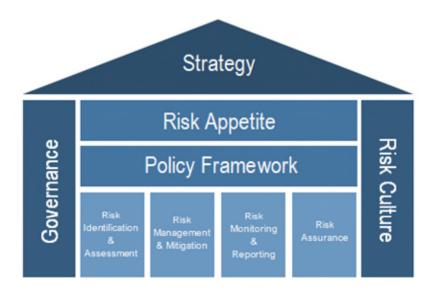
Introduction

Risk Management is an essential component of Council's governance framework and supports the achievement of council's objectives. Effective risk management increases the probability of successful outcomes whilst protecting the reputation and sustainability of Council.

The risk appetite is the amount of risk an organisation is willing to accept in pursuit of its strategic goals. The Risk Appetite Statement considers the most significant categories of potential risks to Council and provides an outline as to how much risk Council is willing to accept in this area.

How Risk Appetite Fits Within Council

The risk appetite of Council informs the strategic decision-making process. The diagram below shows how the Risk Appetite Statement fits into the organisation and informs risk management.



Our community is at the center of everything we do. The community's priorities and aspirations for the future as well as their wellbeing form the basis of our Corporate Plan. The needs of our community are front of mind in the development of our risk appetite as we balance the achieving of the goals set by our community with the risks inherent in the environments in which we deliver those outcomes.

Risk Appetite

Council, its subcommittees, management, and staff (including contractors and volunteers) are expected to consider Council's Risk Appetite in both strategic and operational decision making.

Council's vision and strategic objectives will necessitate that Council accept some risks that accompany growth, transformation, innovation and are proportionate with the potential reward. Overall, Councill has a moderate appetite for risk, and applies a balanced approach aligned to its strategic objectives.

Council's approach to risk appetite is to minimise the risk exposure to our people and their safety, our reputation and corporate governance, whilst accepting and encouraging an increased degree of risk in pursuit of our key strategic directives.

It is acknowledged that Council may at times undertake activities that inherently carry greater risks. As a result, Council's risk appetite in a particular risk category may on occasion be different to the risk level for an activity or project within that category and will be assessed on a case-by-case basis. The Enterprise Risk Management Procedure detail's requirements for identifying and managing risks at activity or project level.

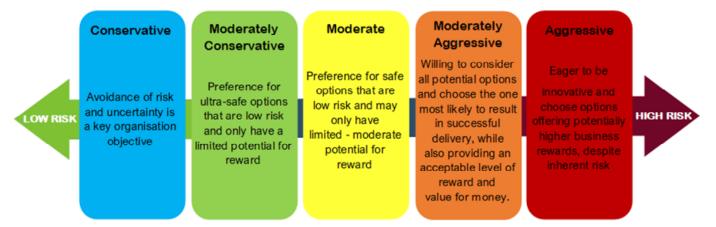
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Risk Appetite Ratings

Council categorises its level of risk appetite into five categories as outlined below:



Risk Tolerances

Risk tolerances are the boundaries set for risk taking. The Risk Appetite Statement informs the development of risk tolerances for Council and provides guidance on how the Risk Appetite Statement is to be applied to everyday business actions and decisions.

While risk appetite is a qualitative statement, risk tolerances operationalise the statement by using quantitative measures where possible to better enable monitoring and review.

The risk appetite will set the tone for risk taking in general, whilst the tolerance informs:

- Expectations for mitigating, accepting, and pursuing certain types of risk;
- Boundaries and thresholds for acceptable risk taking; and
- Actions to be taken or consequence for acting beyond appropriate tolerances.

Implementation of the Risk Appetite Statement

Council's appetite for and tolerance of risk as outlined in the Risk Appetite Statement forms the basis of our approach to managing risk in our day-to-day activities. The Risk Appetite Statement informs the Enterprise Risk Management Policy and framework which provide the structure for our risk management processes.

Staff are responsible for managing their risk environment. This includes having appropriate controls in place and monitoring their effectiveness. These risks are identified, assessed and managed at both enterprise level ('top-down') and at operational level ('bottom-up'). Risk registers are used to document the risks.

Risks outside the appetite or agreed tolerance levels should be managed in line with this Risk Appetite Statement and should be reported to the Executive Leadership Team. The Executive Leadership Team is accountable for compliance with the Risk Appetite Statement. Risk appetite also needs to be articulated for discussion at Council meetings and at the Audit, Risk and Improvement Committee meetings.

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FINANCIAL

MODERATELY CONSERVATIVE



Council recognises the financial risks involved in delivering a wide range of services, programs and capital projects. Council has a moderately conservative appetite for operational financial risk providing that the opportunity or return provides a demonstrated benefit or return for Council/community, and where long-term financial sustainability is not threatened.

Council's Investment Policy stipulates a passive investment approach that ensures the return of capital.



Council will tolerate:

- Minor unforeseen and unavoidable budget variations to the lesser of 10% or \$100,000 without Council approval.
- Short Term (<12months) negative performance from commercial business aspects if core services are not affected.
- Minor losses, or capital outlays, attributable to new processes or innovation to improve services to meet community needs.
- Calculated financial risks to deliver infrastructure, improve service delivery or promote ecological sustainability.
- Investment activities that will preserve capital, maintain appropriate liquidity, and maximise interest returns.
- Improvements, efficiencies and/or generation of additional sources of income.

Council will not tolerate:

- Financial activities and/or investment practices that contravene legislated or policy requirements.
- Failure to maintain or implement effective systems, processes and controls which adequately protest Council from fraudulent activity.
- · Fraudulent or corrupt financial transactions.
- Actions that have a significant negative impact on long term financial sustainability.
- · Financial sustainability measure assessed risk rating of High or Vey High.

ECONOMIC

MODERATELY CONSERVATIVE



Council aims to build economic capacity of the shire to create better conditions for economic growth and investment. In pursuit of this objective, Council has developed and is guided by the 'BluePrint 2030' to support the vibrancy, diversity and sustainability of the Shire as a location of choice in which we live, work, play and invest.

Council understands that there are many external factors that contribute to the level of risk posed to the uncertainty of outcomes (such as production, consumption, and distribution of goods and services). Council understands that it has to be responsive to change, and be proactive in strategic planning to identify community needs over the long term.

TOLERANCE

Council will tolerate:

Projects/activities/initiatives that focus on:

- Delivery of essential enabling infrastructure.
- Sustainable population growth.
- Growth and retention of existing businesses and residents.
- · New industry investment, growth and diversification in priority sectors.
- Attraction of visitors to the region.
- Development of a skilled and adaptable workforce.
- Increased local employment for the Shire's residents.

Council will not tolerate:

- · Failure to plan for economic growth.
- · Failure to engage with the community to determine long term needs.
- Projects/activities/initiatives that threaten economic growth and investment to the region.
- Failure to assess actions/initiatives for 'Benefits Realisation' and 'Capacity to Implement'.

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DIGITAL ASSETS, SYSTEMS, DATA & CYBER SECURITY

MODERATELY CONSERVATIVE



Council's applies a moderately conservative approach to managing risks associated to digital assets, systems, data, and cybersecurity. We understand that no digital environment is entirely risk-free, and prioritise safeguarding the integrity, availability, and confidentiality of our digital resources and information. We will accept some degree of risk while emphasizing robust data backup, redundancy, strict access controls, and proactive cybersecurity measures. We are committed to responsible digital governance through the application of appropriate internal controls, a cyber aware workforce, timely remediation of identified control weaknesses and consistent management of our third-party providers and external threat landscape.



Council will tolerate:

- Scheduled outage that are agreed with respective business units/owners and are regarded as part of normal business activities.
- Implementation of new technologies which create new opportunities for business improvement and innovation of systems which also could involve some minor to moderate risk.
- Timely remediation of identified cyber security control weaknesses.

Council will not tolerate:

- Prolonged unplanned outages of critical Council systems and services.
- Failure to maintain systems and services which adequately protect Councils data and information and maintain adequate audit trails.
- A lack of diligence in relation to information security, the procedure and implementation of ICT systems and services.
- Data loss due to inappropriate data management processes.
- Poor information governance processes.
- · Failure to maintain recovery plans in place and test plans on a regular basis.
- · Cybersecurity threats that could have been prevented through judicious applications of technical and behavioural controls
- Significant threats to assets arising from external malicious attacks.
- · Misuse, inappropriate distribution or loss of sensitive or confidential information due to the actions of staff.

ASSETS & INFRASTRUCTURE

MODERATELY CONSERVATIVE



Council is committed to continuous improvement in order to provide excellent infrastructure services that provide benefits to our Community. Council is open to taking moderately conservative levels of risk to enhance our region's infrastructure and has a tolerance for the loss of assets and infrastructure providing that the impact is short term, and the asset/infrastructure is not defined as critical.



Council will tolerate:

- Minor impacts leading to short term disruption to community due to implementation of construction procedures which provide value for money provided community has been informed.
- Minor short-term financial impact on capital costs of projects where there are demonstrated long-term sustainable gains.
- Minor impacts to infrastructure due to implementation of new technology, innovation initiatives or projects.
- Unforeseen interruptions of up to 2 days to critical infrastructure from uncontrollable events where Council responds and communicates promptly to impacted stakeholders.

Council will not tolerate:

- · Failure of third-party contractors to provide services within budget and agreed timeframes.
- Non-completion of a significant portion of new or renewal infrastructure projects beyond financial year (or scheduled completion period if
 project runs across multiple years).
- · Significant delays to projects that are considered within Council control.
- · Asset failure significantly earlier than the projected lifespan of the asset.
- Failure to administer and manage contracts appropriately.
- · Significant foreseeable variations in contract price due to aspects of the project within the controls of Council
- Failure to escalate critical infrastructure damage or issues.
- Failure to develop plans to respond to a disruption and ensure continuity of operational infrastructure.
- Activities that result in reasonably foreseeable and preventable fatalities, harm, serious injury or illnesses.

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PEOPLE

MODERATE



Council values it's people and recognises the importance of effective people strategies to identify, attract and retain key talent and capabilities in a competitive labour market and is committed to creating a positive and inclusive workplace culture that embeds our organisational values so employees feel connected to their workplace and have a sense of purpose.



TOLERANCE

Council will tolerate:

- Activities/ programs/ initiatives that promote recruitment and selection processes, talent & succession strategies for a skilled workforce.
- Initiatives for technology advancements associated with integrated learning and development.
- Opportunities to develop a skilled workforce that includes employees increasing their skills and knowledge as well as encouraging initiative and enthusiasm.
- Effective performance management

Council will not tolerate:

- Inability to appropriately consider or manage significant impacts of an aging workforce.
- Significant impacts to developing and implementing Workforce Plans/Strategies.
- Employees performing duties for which they are not suitably qualified, training or acting outside of their delegated authority.
- Failure to appropriately resource business functions that threaten safe work practices.
- Implementing practices and procedures that results in large scale dissatisfaction within the workforce.
- Major impacts to staff turnover.
- · Serious conduct and behaviour which do not align to Council's Values.
- Reduced long-term productivity due to poor people management practices.

GOVERNANCE

MODERATELY CONSERVATIVE



Council is committed to good governance and meeting legislated and regulatory requirements in a consistent and fair manner. Council has minimal appetite for significant breaches of legal obligations or contractual agreements that result in fines, penalties or reputational damage. Council will seek innovative approaches to governance practices subject to compliance with legislation and protection of our interests.



TOLERANCE

Council will tolerate:

- Decisions made on merit in accordance with Council values that are not in line with professional advice.
- . Unavoidable minor technical breaches that have been considered by Council.
- Temporary non-compliance due to unrealistic regulatory timeframes.
- Risks which may give rise to isolated complaints that are incidental to normal business activities despite best efforts to avoid or mitigate.
- Streamlined governance processes subject to effective controls remaining in place.

Council will not tolerate:

- Corrupt or fraudulent conduct by employees, Councillors, contractors or volunteers.
- Unreasonable delays when reporting, investigating or correcting any fraudulent, improper, unethical or corrupt conduct.
- Any instances where Council employees, Councillors, contractors or volunteers knowingly break the law, fail to comply with legal obligations or recklessly breach internal policies.
- Material breaches of legislation, breaches of the Code of Conduct, or successful litigation against Council.
- · Failure to consider expert/ professional legal advice.
- · Unauthorised release or disclosure of confidential information.
- Any behaviour which gives rise to extensive litigation and indictable offences.

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ENVIRONMENTAL

MODERATELY CONSERVATIVE



Council recognises the importance of conserving and enhancing our environment and understands that sustainability considerations in all council decisions is important. Council strives to enhance environmental impacts arising from normal business activities and is open to innovative practices for the betterment of the environment.

TOLERANCE

Council will tolerate:

- Environmental impacts offset by other activity resulting in a net environmental benefit.
- Minor environmental impacts from uncontrollable or unforeseen events or in order to deliver enduring benefits to the community well into the future.
- Changes to procedures and practices to accommodate improved environmental outcomes.
- Minor cost impacts in the selection of products, services that have a significant positive impact on the environment.

Council will not tolerate:

- Decisions that do not appropriately consider the principles of ecologically sustainable development or Councils value of sustainability.
- Failure to minimise significant impacts on biodiversity and reduce our ecological footprint.
- Decisions, activities and practices that result in long term or irrevocable environmental damage or negative climate impacts, threatens biodiversity, including extinction of flora and fauna, or is hazardous to human life.
- Activities or practices that knowingly compromise the environment, are reasonable foreseeable and preventable.
- Failure to meet environmental commitments or legal requirements resulting in fines or penalties.

WORKPLACE HEALTH & SAFETY

CONSERVATIVE



Council is committed to providing a safe and healthy workplace for all employees and has minimal appetite for work practices, actions or inactions that compromise the wellbeing and safety of people including staff, contractors, volunteers and community.

TOLERANCE

Council will tolerate:

- · Minor unforeseen incidents or injuries that arise from time to time while undertaking normal activities.
- · Minor morale issues relating to improving workforce performance.
- Practices that are not in line with best practice if safety and duty of care is not compromised.

Council will not tolerate:

- Activities that result in reasonably foreseeable and preventable fatalities, harm, serious injuries or illnesses to our Community, Customers, Councillors or Employees.
- Actions or behaviours that are deliberate and willingly contravene WHS legislation, regulations, policies and procedures.
- Practices that knowingly compromise staff wellbeing, workplace or community safety (including discrimination, harassment or bullying).
- Events that occur arising from untrained employees, failed internal processes or inadequate safety protocols.
- Unsafe infrastructure and work environments.

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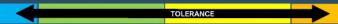
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SERVICE DELIVERY

MODERATE



Council delivers a range of community services, events and facilities which contribute to our Shire. Council is open to creativity and innovation and is willing to take some level of risk to deliver efficiencies, enhance capabilities and provide a service to be proud of to our community. Council is open to taking a moderate level of risk to enhance service delivery.



Council will tolerate:

- Unforeseen interruptions of up to 2 days to critical business functions from uncontrollable events where Council responds and communicates promptly to impacted stakeholders.
- Unforeseen interruptions of up to 7 days to less critical business functions from uncontrollable events where Council responds and communicates promptly to impacted stakeholders.
- Moderate reputational impact from community complaints relating to service quality or new initiatives to deliver enduring benefits to our community.
- Moderate impacts to service delivery due to implementation of new technology, innovation initiatives or projects.
- Moderate impacts arising from innovations and ideas that contribute and encourage creating a flexible workforce.

Council will not tolerate:

- Failure to significantly meet our service commitments and community expectations.
- Failure to demonstrate a commitment to delivering quality services to our Community, Councillors, Customers and Employees.
- Failure to document and follow policies and procedures that impairs the quality of service delivery or results in service interruptions.
- Failure to develop plans to respond to a disruption and ensure continuity of critical business functions.
- Failure to escalate a critical business function outage within 2 hours.

REPUTATION

MODERATELY CONSERVATIVE



Council recognises that competence (professionalism and doing our job well), and integrity (openness, honesty, and transparency) are the cornerstones of public confidence in public service and public decision-making. Not everyone will always agree with every decision or action, but Council is committed to doing what it believes to be the greatest good for the community. Accordingly, Council has a moderately conservative appetite for risks that might impact on its public reputation.



Council will tolerate:

- Moderate adverse local media and social media scrutiny or a number of complaints relating to action or omissions.
- Isolated minor incidents, concerns and complaints that can be resolved without reference to external agencies.

Council will not tolerate:

- Failure to act in a fair, honest, transparent and accountable manner.
- Improper, unethical, corrupt, unprofessional behaviour or failure to exercise respect and duty of care in accordance with the law, policies and codes of conduct.
- Failure to uphold the probity of council decision making.
- Any failure to avoid or appropriately manage conflicts of interest.
- ♦ Failure to notify management of actions or omissions that result in more than moderate adverse local media or social media.
- · Complaints that are not responded to in a prompt and professional manner.

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