

## **Audit and Risk Committee - 13 June 2024 Attachments**

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# Risk Management Framework





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## **INTRODUCTION**

### **RISK MANAGEMENT**

Risk management is a critical aspect of the City's corporate governance requirements and involves a continual process of review and assessment of both risks and controls to ensure the City achieves a balance between achieving its operational and strategic objectives and minimising adverse impact on the City's health and safety, reputation and sustainability. To be sustainable and effective, risk management must be incorporated into all activities, tasks and all aspects of service delivery.

The objectives of risk management include:

- Achievement of the City's strategic objectives and goals including Integrated Planning requirements;
- Compliance with legislation, regulations and policies;
- Ongoing health and safety of all City employees and patrons;
- Limited loss or damage to City assets;
- Limited interruption to business continuity; and
- Positive reputation and perception of the City, Council and its officers.

The City's Risk Management Framework recognises the application of the Australian Management Standard (AS ISO 31000:2018 Risk Management) in the identification, treatment, monitoring and reviewing of risks to its operational and strategic objectives.

The City is a multi-faceted organisation with many areas having risk unique to that area, which can be both strategic and/or operational and which has a broader impact on the City's risk landscape as a whole. These particular operational areas have developed specific risk management plans in accordance with this framework and which are set out in the Risk Management Strategy.

### **PURPOSE AND OBJECTIVES OF THIS FRAMEWORK**

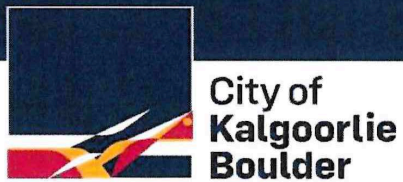
This Risk Management Framework is established pursuant to the City's Risk Management Policy and in accordance with the City's Risk Management Strategy.

This framework incorporates all aspects of risk management and sets out the broad approach for managing risk. It is designed to provide City officers with the ability and confidence to manage risk to a level that is acceptable to the City and Council.

This Risk Management Framework sets out:

- Categories of risks applicable to the City, and relevant external and internal influences;
- Principles of risk management;
- Determination of the City's risk Tolerance;





- Risk Assessment requirements including treatment development; and
- Risk Management expectations.

#### **RELATIONSHIP OF RISK MANAGEMENT FRAMEWORK WITH OTHER CORPORATE DOCUMENTS**

This Risk Management Framework supports and is supported by the City's following corporate documents:

**Risk Management Policy** sets out Council's commitment to effective risk management activities by the City as a component of its good governance practices. This policy is developed in accordance with that policy.

**Risk Management Strategy** sets out the City's plan to develop, improve and embed a risk management culture, and implement the City's risk management requirements.

**Risk Management Procedure:** sets out requirements for City officers to undertake regular risk review practices and provides guidelines within which these should be completed.

**Corporate Performance Framework** sets out requirements for risk reporting to the Audit and Risk Committee, including relevant timeframes for completion of such reports.

**Governance Framework** sets out the principles and systems used by the City to achieve high standards of governance including transparency, strategic long-term planning and informed decision-making (for which risk management is a key component).



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## RISK CONTEXT AND PRINCIPLES

### CONTEXT

The context in which a Risk is assessed is:

1. The organisational context in respect of the risk evaluation criteria and the City's adopted Risk Appetite and Risk Tolerance; and
2. The category of Risk, being one of the following:

**Strategic Risks:** Risks associated with the City's achievements and its strategic and long-term objectives. These are owned by the ELT and Council and include:

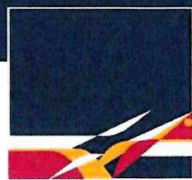
- Risks relating to the delivery of Strategic Community Plan (eg. Political, stakeholder engagement, transparency);
- Risks relating to the delivery of the Corporate Business Plan (eg. resourcing, asset management, sustainability, provision of services and facilities, structured policies and procedures); and
- Risks relating to corporate governance eg. (compliance, financial management, organisational culture, integrity systems, protection from liability, OHS management, managing organisational capacity and capability).

**Operational Risks:** Risks associated with the normal business and day-to-day functions of the City. These are owned by the relevant officer/s who have responsibility for the relevant activity and include:

- Risks relating to the delivery of the Long Term Financial Plan (eg. operational costs and capacity, delivery of strategies and plans);
- Risks relating to the delivery of the Asset Management Plan eg. (asset maintenance and renewal, resourcing);
- Risks relating to the delivery of the Workforce Plan (eg. salaries, unions, staff attraction and retention, housing); and
- Site hazards (eg. WHS, psychosocial, environmental issues).

**Project Risks:** Risks associated with specific projects being delivered by the City. These are owned by the officer/s delivering the project and include risks associated with planning and delivery as well as site hazards.

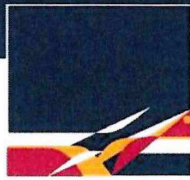




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All categories of risks are subject to external and internal influence including examples set out below.

<b>External Context</b> (Out of the City's control) <ul style="list-style-type: none"> <li>• Economic conditions</li> <li>• Political conditions</li> <li>• Growth/change in City</li> <li>• Funding</li> <li>• Legislation</li> <li>• Environmental conditions</li> <li>• Reputation with community and stakeholders</li> </ul>	Strategic Risks	<b>Internal Context</b> (Within the City's control) <ul style="list-style-type: none"> <li>• Organisational culture</li> <li>• Governance capability</li> <li>• Systems and data</li> <li>• Staff recruitment and retention</li> <li>• Policy, plans and frameworks</li> <li>• Asset management</li> </ul>
<ul style="list-style-type: none"> <li>• Ability to deliver services</li> <li>• Community expectations</li> <li>• Community engagement safety</li> </ul>	Operational Risks	<ul style="list-style-type: none"> <li>• Budgets</li> <li>• processes</li> <li>• Compliance</li> <li>• Annual planning and reporting</li> <li>• Safety</li> </ul>
<ul style="list-style-type: none"> <li>• Reputation</li> <li>• Contractor management</li> <li>• Quality/time/cost</li> <li>• Financial</li> </ul>	Project Risks	<ul style="list-style-type: none"> <li>• Project management tools and capability</li> <li>• Project scoping and clarity</li> <li>• Project governance and transparency</li> </ul>



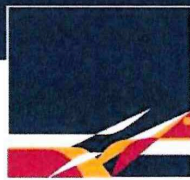
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## PRINCIPLES

The City's risk management process abides by the following principles:

<b>Integrated</b>	Risk management is a demonstrable part of the planning and delivery of projects and services and is integrated in all of the City's activities.
<b>Structured and comprehensive</b>	The approach to risk management delivers consistent and reliable results which can be monitored and managed.
<b>Customised</b>	The risk management system is tailored to meet the demands of the risk profile to support the diversity of the Council's objectives.
<b>Inclusive</b>	Appropriate and timely involvement of stakeholders to allow them to be properly represented and have their views considered.
<b>Dynamic</b>	Change occurring due to internal or external controls continually acknowledged and responded to.
<b>Best available information</b>	Historic, current and future sources of information are used to inform risk based decision-making.
<b>Human and cultural factors</b>	Human behaviour and culture is recognized as having significant influence on all aspects of the City's risk management.
<b>Continuous improvement</b>	Risk management is used to help make better and informed decisions and to distinguish when alternative courses of action are available.





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## **RISK MANAGEMENT PROCESS**

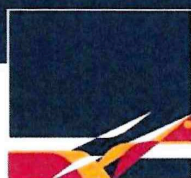
A number of steps need to be completed in risk management to ensure the process is effective, the information is valuable, and the City's risk exposure is limited wherever possible. Some of these steps comprise Risk Assessment and others are ongoing Risk Management Actions that must be implemented at all stages.

The Risk Assessment steps are as follows:

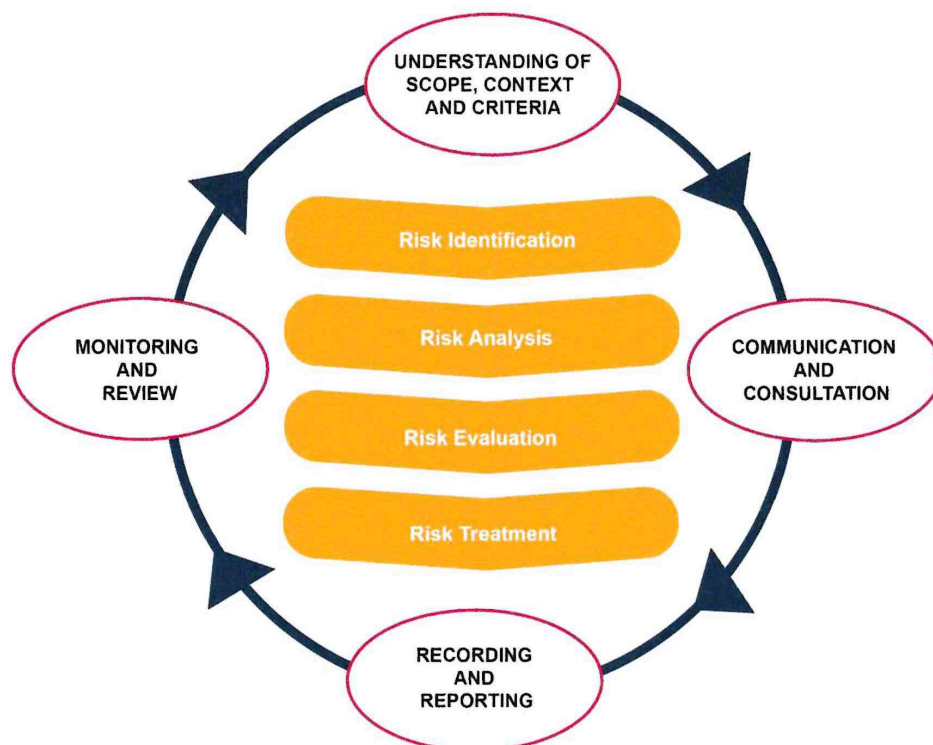
1. Risk identification;
2. Risk analysis;
3. Risk evaluation; and
4. Risk treatment.

The additional ongoing Risk Management steps are as follows:

1. Communication and consultation;
2. Understanding of scope, context and criteria;
3. Monitoring and review; and
4. Recording and reporting.



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## RISK ASSESSMENT

### Step 1: Risk identification

This first stage requires:

1. Identification of a risk by considering what, how, why and when events may occur which could have an impact on achieving a service, project or other goal or function;
2. Categorisation of the identified risk as strategic, operational or project; and
3. Identification of any external or internal influences.

### Step 2: Risk Analysis

Once a risk has been identified, it requires regular, consistent analysis and evaluation. Where an individual has identified a risk, they should engage with their team and direct supervisor to conduct the rest of the Risk Assessment steps.

The following matrix sets out how the likelihood and consequence of a risk are used to inform the risk assessment:

	Negligible (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Almost certain (5)	Moderate (5)	High (10)	High (15)	Extreme (20)	Extreme (25)
Likely (4)	Low (4)	Moderate (8)	High (12)	High (16)	Extreme (20)
Possible (3)	Low (3)	Moderate (6)	Moderate (9)	High (12)	High (15)
Unlikely (2)	Low (2)	Low (4)	Moderate (6)	Moderate (8)	High (10)
Rare (1)	Low (1)	Low (2)	Low (3)	Low (4)	Moderate (5)

To use this matrix to assess an identified risk, City officers must consider consequence and likelihood factors.

### Consequence

This means the impact on the City if the risk does eventuate. The level of impact will be one of:

- Catastrophic;
- Major;





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- Moderate;
- Minor; or
- Negligible:

This must be considered against each of the following categories:

- Health/injury;
- Financial loss;
- Service interruption;
- Legislative breach;
- Reputational damage;
- Property damage;
- Environmental damage;
- Project time; and
- Project cost.

When determining which is the applicable rating for a risk consequence, consideration should be given to the level for which the most categories are assessed, and a reasonable balance achieved if there is a variety of levels of risk within the nine categories.

The following table provides guidance on what level of consequence would apply in respect of each category:

	Negligible	Minor	Moderate	Major	Catastrophic
<b>Health/injury</b>	Low reversible health impact on City officers or the public	Short term health/ injury impact on City officers or the public	Medium health/ injury effect on City officers or the public	Significant health/ injury effect to City officers or the public	Death or long term health/ injury effect to City officers or the public
<b>Financial loss</b>	Negligible financial loss <\$5K	Notifiable financial loss \$5k - \$50K	Substantial financial loss \$50K - \$500k	Significant financial loss \$500K- \$1m	Extensive financial loss \$1m+
<b>Service interruption</b>	Minimal disruption to services	Momentarily minor service interruption	Closure of essential service departments and disruption of utility supply	Closure of essential services and departments	Complete shutdown of services and departments
<b>Legislative breach</b>	Little to no legislative breaches with optional participation in performance management and training	Slight interruption of service delivery with possible requirement to participate in performance management and training	Subject to legal penalties and interruption of service delivery	Subject to dismissal and legal penalties	Subject to dismissal and legal penalties and criminal prosecution
<b>Reputational damage</b>	Reputation not affected with no effort or expense required to	Minimal effect on reputation with little effort or expense required to	Reputation damaged with some effort and expense required to	Reputation severely damaged with considerable effort and	Reputation irrevocably damaged or destroyed. Severe impact



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	recover. No impact on staff turnover.	recover. Minor impact to staff turnover	recover. Moderate impact on staff turnover	expense required to recover. Major impact on staff turnover	on staff turnover
<b>Property damage</b>	Minor damage or vandalism to assets	Minor damage or loss of <5% of total assets	Damage or loss of <20% of total assets	Extensive damage or loss of <50% of total assets	Destruction or complete loss of >50% of assets
<b>Environmental damage</b>	Negligible environmental impact	Minor environmental damage/impact	Significant environmental damage/impact	Significant environmental damage/impact	Extensive environmental damage/impact
<b>Project time</b>	Timely project completion rate	Minimal overdue project completion rate < one month	Slightly overdue project completion rate < six months	Overdue project completion rate < one year	Extensively overdue project completion rate > one year
<b>Project cost</b>	Significantly low project cost <\$5K	Low project cost \$5k - \$50K	Moderate project cost \$50K - \$500k	High project cost \$500K - \$1m	Significantly high project cost \$1m+

### Likelihood

This means the likelihood of the risk eventuating with the defined consequences. The matrix describes these categories in the left-hand column, as follows:

- **Almost certain:** High probability or chance of something happening.
- **Likely:** Moderate chance of something happening.
- **Possible:** Will probably occur, but not a persistent issue.
- **Unlikely:** May occur, infrequently.
- **Rare:** Will almost never occur.

Depending on the nature of the risk in question, likelihood may be a question of probability or frequency.

When assessing a risk, there must be an assessment using the risk matrix in two scenarios, as follows:

- Inherent Risk: The risk if there were no implemented controls to mitigate this ("Inherent Risk"); and
- The risk after controls are implemented, with consideration of the effectiveness of the controls being implemented ("Residual Risk").

### Step 3: Risk Evaluation

This step requires considering the outcomes of the risk assessment and whether the identified risk at its assessed Initial Risk and Residual Risk ratings:

1. Is within the Risk Tolerance; and
2. Achieves the desired Target Rating.



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Where the risk is not within the Tolerance or the Controls are not reducing the risk to the Target Rating, further consideration will be needed in terms of whether sufficient controls can be implemented (and if not whether the relevant activity can be delivered at all).

**Step 4: Risk treatment (controls)**

Controls are the measures that are or will be implemented to reduce the likelihood of the risk eventuating and/or the impact on the Shire if it does eventuate. Shire officers must consider all of the options available to them to mitigate a risk, and consider both the design of the control and how well it can be implemented.

When considering those things, City officers must make a determination as to the effectiveness of the control, using the following criteria:

**Fully effective:** The control is an excellent means of mitigating the risk; the control is well designed and has been implemented, tested and monitored.

**Substantially effective:** The control is a good means of mitigating the risk; it is adequately designed and operating effectively but there is room for improvement in design and/or implementation.

**Partially effective:** The control may mitigate the risk but there is room for improvement; the control is either designed adequately but not operating effectively or is designed inadequately but able to operate effectively.

**Largely ineffective:** The control does not adequately mitigate the risk and other controls should be implemented in addition to this control.

**Totally ineffective:** Neither the design or the implementation of the control will mitigate the risk and the control should not be relied upon.





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## **ONGOING RISK MANAGEMENT**

### **Communication and consultation**

Throughout all stages of the risk management, consultation with stakeholders is required. Stakeholders include all officers with knowledge or actions relevant to either the risk or the controls but may also include external parties such as contractors.

In addition to informing the risk management process, communication and consultation is key to embedding a risk management culture at the City; it involves ongoing and regular education, training, knowledge sharing and collaboration.

### **Knowledge and understanding of Context and Criteria**

Throughout all stages of risk management, officers need to ensure they understand the purpose of the risk assessment and the factors that need to be considered. "Context" requires knowledge of the category of risk as well as relevant external and internal influences and "criteria" refers to knowledge of the City's risk matrix tool and established tolerances.

### **Monitoring and review**

Once risks and their controls have been assessed and implemented, ongoing monitoring is required to:

- Consider changes in environment, information and context;
- Ensure assessments remain accurate;
- Ensure Tolerances and Target Ratings remain valid and the risk evaluation remains within the Tolerance and at or working towards achieving the Target Rating;
- Ensure controls are being designed and implemented effectively; and
- Identify new Controls.

### **Recording and reporting**

The City uses the software platform Pulse to maintain its risk register and all information relating to the Risk Assessment and Risk Management requirements.

In addition to Pulse being used to record these requirements, Pulse is used for reporting to the Finance and Audit Committee in accordance with the City's Corporate Performance Framework.



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## DEFINITIONS

The following definitions apply in this document unless a contrary context appears:

**City** means the local government organisation known as the Shire of Kalgoorlie-Boulder.

**Consequence** means the outcome of an event.

**Council** means the body of elected members, including the Mayor, which governs the City.

**ELT** means the City's Executive Leadership Team comprised of the CEO, Directors and Executive Managers.

**Inherent Risk** has the meaning given on page 11.

**KPIs** means key performance indicators.

**Likelihood** means the chance of an event happening.

**OHS** means occupational health and safety.

**Operational Risks** means Risks associated with the normal business and day-to-day functions of the City including operational costs, workforce planning, asset maintenance and renewal, environmental hazards, delivery of Long Term Financial Plan, Asset Management Plan and Workforce Plan.

**Project Risks** means Risks associated with specific projects being delivered by the City including project management and delivery and site hazards.

**Residual Risk** has the meaning given on page 11.

**Risk** means the chance of something happening that will have an impact on objectives, categorised by the City as strategic, operational or project.

**Risk Appetite** has the meaning given in the City's Risk Management Strategy.

**Risk Assessment Matrix** means the adopted matrix set out in the Risk Management Framework.

**Risk Rating** means the rating of the risk determined with reference to Likelihood and Consequence, using the City's Risk Assessment Matrix.

**Strategic Risks** means Risks associated with the City's achievements and its strategic and long-term objectives including compliance, financial management, organisational culture, integrity systems, protection from liability, sustainability, OHS, delivery of Strategic Community Plan and Corporate Business Plan.

**Target Rating** means the ideal likelihood and consequence ratings for a risk.

**Tolerance** has the meaning given in the City's Risk Management Strategy.



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**Treatment** means an action taken to reduce the Likelihood or Consequence of a risk eventuating (also known as a **Control**).





## RISK MANAGEMENT POLICY

**POLICY NUMBER: EXEC-CEO-014**

### PURPOSE

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The objective of this Policy is to state the intention of the City to identify potential risks before they occur so impacts can be minimised or opportunities realised, ensuring the City achieves its strategic and corporate objectives efficiently, effectively and within good corporate governance principles.

### SCOPE

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This policy applies to Council Members and all employees and contractors involved in any City operations.

### DEFINITIONS

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**CEO** means the Chief Executive Officer of the City.

**City** means the City of Kalgoorlie-Boulder.

**Council Members** means elected members of the Council.

**Risk** means effect of uncertainty on objectives.

**Risk Management** means coordinated activities to direct and control an organisation with regard to risk.

**Risk Management Process** means systematic application of management policies, procedures and practices to the activities of communicating, consulting, establishing the context, and identifying, analysing, evaluating, treating, monitoring and reviewing risk.

### POLICY STATEMENT

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The City is committed to achieving best practice (aligned with AS/NZS ISO 31001:2018 Risk management – Guidelines) in the management of all risks that may affect the City meeting its objectives.

Risk Management functions will be resourced appropriately to match the size and scale of the City's operations and will form part of the strategic, operational, and project responsibilities and be incorporated within the City's Integrated Planning Framework.



## POLICY DETAILS

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### ***Risk Management***

The CEO will implement across the City a Risk Management Framework and Risk Management Strategy to:

1. Encourage a risk-focused culture where all officers consider both risk and controls in their day-to-day functions;
2. Ensure City officers undertake appropriate risk assessments in relation to activities including delivery of core services and projects and development of proposals;
3. Support City officers in identifying practical controls which can be implemented in day-to-day activities to reduce strategic, operational and/or project risk to the City;
4. Provide a mechanism for greater formal oversight by the CEO, Executive Leadership Team, Audit and Risk Committee and Council;
5. Gain better understanding of the risk versus return on any service, project or proposal at an earlier stage in decision-making;
6. Increase information available to officers, the CEO, Executive Leadership Team and Council to promote more effective and transparent decision-making;
7. Achieves effective corporate governance and adherence to relevant statutory, regulatory and compliance obligations;
8. Enhance organisational resilience through better planning for continuity of critical functions.

### ***Council's statements of Risk Appetite and Risk Tolerance***

At least once per financial year, Council will determine its Risk Appetite and Risk Tolerance to provide guidance to City officers of the level of risk within which the City should operate. Risk in relation to services and projects must be within Council's determined Risk Appetite and Risk Tolerance.

### ***Risk Assessment Criteria***

All risks are to be assessed according to the Risk Management Framework, which includes risk assessment criteria, and controls are to be developed and assessed on their ability to mitigate risk to the City. Application of the Risk Management Framework and Risk Management Strategy allows consistency and informed decision making.

### ***Monitor and Review***

The City will implement and integrate a monitor and review process to report on the achievement of the risk management objectives, the management of individual risks and the ongoing identification of issues and trends,

## COMPLIANCE REQUIREMENTS



RELEVANT DOCUMENTS

Risk Management Framework  
Risk Management Strategy

DOCUMENT CONTROL		
Responsible department	Governance	
Date adopted by Council	March 2023	Resolution number:
Date of last review	May 2024	Policy reviewed and amended
Date of next review	May 2025	



# **RISK MANAGEMENT PROCEDURE**

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## INTRODUCTION

### PURPOSE OF RISK MANAGEMENT PROCEDURE

This Risk Management Procedure sets out guidelines to support officers to implement the Risk Management Framework and Risk Management Strategy.

### RELATIONSHIP OF RISK MANAGEMENT PROCEDURE WITH OTHER CORPORATE DOCUMENTS

This Risk Management Framework supports and is supported by the City's following corporate documents:

**Risk Management Policy** sets out Council's commitment to effective risk management activities by the City as a component of its good governance practices. This policy is developed in accordance with that policy.

**Risk Management Strategy** sets out the City's plan to develop, improve and embed a risk management culture, and implement the City's risk management requirements.

**Risk Management Framework** sets out the concepts and principles which define the City's risk management process.

**Corporate Performance Framework** sets out requirements for risk reporting to the Audit and Risk Committee, including relevant timeframes for completion of such reports.

**Governance Framework** sets out the principles and systems used by the City to achieve high standards of governance including transparency, strategic long-term planning and informed decision-making (for which risk management is a key component).



## **RISK MANAGEMENT PROCESS**

### **STANDING MONTHLY MEETING AGENDA ITEM**

“Risk” should be at a minimum as a monthly standing agenda item for:

1. Business unit meetings – there is an expectation that all officers review and have opportunity for input into:
  - a. Review of analysis and evaluation of current risks within their business unit;
  - b. Identification and consideration of any new or emerging risks to be documented (and assessment and evaluation of those);
  - c. Effectiveness of current controls; and
  - d. Consideration of new controls (including design and implementation considerations);
2. Management meetings to:
  - a. Identify and reduce double up of risks and collate risk content where appropriate;
  - b. Ensure consistency in approach;
  - c. Provide organisation wide operational oversight of risks and control measures;
  - d. Identify risks and controls that exist across multiple business units and ensure appropriate communication and collaboration mechanisms are in place to manage the risk;
  - e. Interrogate risk data to determine and recognise failures and successes in risk management strategies;
  - f. Identify knowledge gaps and training requirements; and
  - g. Prepare feedback for reporting to ELT on outcomes of the monthly review;
3. ELT meetings to:
  - a. Ensure consistency in approach;
  - b. Provide organisation wide operational oversight of risks and control measures;
  - c. Identify risks and controls that exist across multiple business units and ensure appropriate communication and collaboration mechanisms are in place to manage the risk;
  - d. Interrogate risk data to determine and recognise failures and successes in risk management strategies;
  - e. Identify knowledge gaps and training requirements;
  - f. Identify business areas or officers requiring further support, oversight or resource allocation;
  - g. Prepare feedback to the organisation on outcomes of the monthly review; and
  - h. Prepare feedback to the Audit and Risk Committee on a quarterly basis.

### **RISK MANAGEMENT PROCESS**

The Risk Management Framework sets out the context and measures for Risk Assessment using the following four stages:

1. Identification of Risk;
2. Analysis of Risk;
3. Evaluation of Risk; and
4. Treatment of Risk.

The below guidelines provide detail to officers on how to best implement the framework and undertake a Risk Assessment accurately and consistently.

### IDENTIFYING RISKS

There is no single process to be used for the identification of Risks - all City officers are responsible for the identification of Risks and should communicate with their direct manager if they become aware of an issue or event that may present a Risk to the City.

Sometimes they will be identified by an individual in the course of their functions; other times through deliberate group discussions with the purpose of risk identification.

Risks should be considered throughout an officer's day-to-day activities, including (without limitation):

1. Prior to commencing a project or stage of a project;
2. When environmental changes occur;
3. When staff changes occur;
4. When community changes occur;
5. Before commencing a procurement process including a request to tender, request to quote or purchase of goods or services;
6. Before engaging with a third party contractor;
7. Before attending a different site or work location;
8. Before a City-run event;
9. When preparing a business case for a proposal or presentation to ELT; and
10. As part of a Council report.

### STRATEGIC RISK EXAMPLES

Particular Strategic Risk areas for consideration in strategic planning include:

- Legislative and regulatory compliance;
- Legal liability including professional indemnity;
- Financial risk (Long Term Financial Plan, Annual Budget (capex and opex), investment decision making, ongoing costs following completion);
- Workforce planning and human resource needs;
- Community interests;
- Stakeholder relationships and perception including at government, industry and community levels;
- Environmental sustainability;
- Aboriginal Heritage;
- History and Heritage;
- Achievability and realistic timelines for completion;
- Business continuity;
- Contingency plans;
- Impact on assets and facilities including whole of life asset management;
- Due diligence requirements;
- Political issues;
- Opportunities to share risk (e.g. partnerships); and
- Insurance needs.

## OPERATIONAL RISK

Particular Operational Risk areas for consideration in operational delivery include:

- Legislative and regulatory compliance;
- Legal liability including professional indemnity;
- Financial risk (Long Term Financial Plan, Annual Budget (capex and opex), investment decision making, ongoing costs following completion);
- Community interests;
- Stakeholder relationships and perception including at government, industry and community levels;
- Environmental sustainability;
- Achievability and realistic timelines for completion;
- Contingency plans;
- Insurance needs;
- Approval requirements;
- Procurement compliance;
- Contractor induction and management;
- Project management;
- OHS management for staff and contractors;
- Completion of project risk assessment;
- Whole of life of management; and
- Staff resourcing requirements.

## PROJECT RISK

Particular Project Risk areas for consideration in project risk assessment include:

- Supply chain issues;
- Contingency plans;
- OHS;
- Environmental hazards;
- Pricing changes;
- Scope creep;
- Pandemic impact;
- Political influence; and
- Community and stakeholder expectations.

When identifying risks, officers must ask themselves:

- What are we doing?
- Is the risk strategic, operational or project?
- What is involved?
- What could go wrong (cause)?
- What could happen (consequence)?

## RISK ANALYSIS

To analyse a Risk, officers must use the Risk Assessment Matrix set out in the Risk Management Framework to assess:

1. Inherent Risk; and
2. Residual Risk.

Officers should consider each category of the following types of consequence:

- Health/injury;
- Financial loss;
- Service interruption;
- Legislative breach;
- Reputational damage;
- Property damage;
- Environmental damage;
- Project time; and
- Project cost.

For each of these types of consequence, the level of impact must be determined (catastrophic, major, moderate, minor or negligible). For the sake of determining which is the appropriate column to assess the risk, the most common should be selected.

[insert screen shot showing how these columns are used]

Once this assessment has been completed, the Likelihood needs to be assessed, with a risk being assessed as one of the following:

- **Almost certain:** High probability or chance of something happening.
- **Likely:** Moderate chance of something happening.
- **Possible:** Will probably occur, but not a persistent issue.
- **Unlikely:** Have minor or negligible consequences
- **Rare:** Will almost never occur.

[insert screen shot showing how these rows are used]

Once each of the relevant column and row is determined the point at which they intersect on the Risk Assessment Matrix will provide the Risk Rating.

[insert screen shot showing how these rows are used]

## RISK EVALUATION

Council adopts a Risk Appetite and Risk Tolerance position annually, in respect of the upcoming financial year.

These accepted positions form the basis of evaluating whether a Risk, once analysed, is within acceptable thresholds for the City or alternatively, whether further treatments are needed to reduce the Residual Risk rating to the point that the activity can proceed.



## TREATMENT

A Treatment may do one of the following in relation to a Risk:

- Avoid the Risk;
- Change the Likelihood of an event happening;
- Change the Consequence if an event does happen;
- Transfer the Risk through relationships with other parties; or
- Accept the Risk.

When considering treatment options, officers must ask themselves:

- What can we do to reduce the likelihood?
- What can we do to reduce the impact?
- What are the financial or other costs vs benefits of the treatment?

Many Risks can be managed through:

1. Education and training of staff;
2. Management systems including policies and procedures; and
3. Oversight and internal review to ensure treatments are implemented.

## USING PULSE

The City uses a software platform called Pulse for risk management activities.

### ALLOCATION OF RESPONSIBILITY FOR RISK

In Pulse, each Risk will be designated the following responsible officers:

1. Area Owner (being the relevant Director or Executive Manager);
2. Risk Owner (being the relevant manager or coordinator);
3. Control Owner (being the relevant officer/s responsible for management of controls); and
4. Task Owner (being the relevant officer/s with responsibility to implement controls).

### CONTENT OF RISK REGISTER DATA

Pulse is used by the City to manage the City's risk register.

The following content must be considered and recorded in Pulse:

- [insert list of content once Pulse set up is completed – risk area, owner, description, cause, consequence etc]

Consideration must be given to existing content in the Risk Register and consistent use of words, language, grammar and content styling should be used.

Where possible, content from the “library” in Pulse should be used to achieve consistency.

### PRIORITISATION OF RISKS

[Pulse]

### RISK RESOLUTION

The officer assigned as the owner of a risk is responsible for overseeing the execution of treatments and associated risk mitigation activities until the risk is closed out. This includes responsibility for ensuring ongoing periodic and update of the City's risk register.

### CLOSING OUT RISKS

A risk item can be considered closed when it no longer exists.

Risks where there is a low to medium risk rating or which have been accepted by Council should remain recorded in the risk register to ensure that ongoing review of the risk and its treatment occurs.

### AUDIENCE NEEDS

The intended audience for risk data and reporting is:

- Business units and direct managers, for the purpose of ongoing knowledge and information, oversight, monitoring and treatment implementation;
- The Executive Leadership Team for oversight, accountability and informed decision-making;
- Audit and Risk Committee and Council for transparency, accountability and informed decision making.

To meet these needs, all information reported needs to:

- Provide sufficient detail to enable reader not familiar with the subject matter a clear understanding of the risk and the controls;
- Use layperson's language and avoid corporate lingo or jargon which cannot be easily understood;
- Be reliable and accurate to provide a balanced view of the risk and controls; and
- Include information that is easily accessible to eliminate extra reporting burden.

Attached to this Risk Management Procedure are the following 'how to' guides for use of Pulse:

- Appendix 1: How to create a new Risk in Pulse
- Appendix 2: How to modify an existing Risk in Pulse
- Appendix 3: How to create a new treatment in Pulse
- Appendix 4: How to modify an existing treatment in Pulse
- Appendix 5: How to link Risk and treatment ownership to KPIs and appraisals
- Appendix 6: How to link risk with organisational performance indicators

## USE OF RISK DATA

### USE OF RISK DATA TO INFORM STRATEGIC PLANNING

Officers should refer to risk data in relation to:

- 1. Preparation of Annual Budget**
  - Ensure adequate budget provision for proper implementation of all treatments;
  - Ensure financial contingencies are available where identified Risks include price blow outs;
  - Ensure adequate staff resourcing to manage the risk and treatments.
- 2. Preparation of Council report**
  - Reports to Council should include consideration of relevant risks and controls and risk analysis against adopted Risk Appetite and Risk Tolerance;
  - A key component of strong corporate governance is informed decision making and clear, concise analysis of risk data for Council aids understanding of the impact of its decisions.
- 3. Workforce planning**
  - Ensuring adequate staff resourcing to prevent risk of non-delivery eventuating;
  - Ensuring adequate OHS resources to mitigate Risk of OHS incidents;
- 4. Long Term Financial Plan**
  - Consideration of whole of life project costs identified through risk analysis;
  - Contingency plans incorporated;
- 5. Asset Management Planning**
  - Consideration of whole of life project costs identified through risk analysis;

### HIGH OR EXTREME RISKS

Particular attention will be paid to risks that are:

- Rated High or Extreme in their Inherent or Residual Risk scores;
- Have inadequate control ratings compared to the nature of the Risk;
- Risks which have “Extreme” Consequence rating;
- Risks which have an “Almost Certain” Likelihood rating.



## **RISK MONITORING**

### **INTERNAL MONITORING AND REVIEW**

Officers with responsibility for risk management and execution of risk management strategies must ensure they undertake regular reviews of their relevant risks to ensure:

1. Ongoing accuracy of all risk data; and
2. Officers tasked with ownership of treatments have completed all associated tasks.

### **GOVERNANCE REVIEW**

Governance officers will undertake regular review of the risk register to:

- Ensure review processes are being completed adequately;
- Ensure treatments are being identified and communicated with all relevant officers;
- Maintain oversight of changes to risk ratings and in particular escalation of a risk rating or prioritisation;
- Ensure information is reported to OHS representatives for allocation of appropriate resources and support; and
- Report to ELT.

### **INTERNAL AUDIT AND REPORTING**

The City will report to the Audit and Risk Committee in accordance with the Corporate Performance Framework.

## DEFINITIONS

The following definitions apply in this document unless a contrary context appears:

**City** means the local government organisation known as the City of Kalgoorlie-Boulder.

**Consequence** means the outcome of an event.

**Council** means the body of elected members, including the Mayor, which governs the City.

**ELT** means the City's Executive Leadership Team comprised of the CEO, Directors and Executive Managers.

**Inherent Risk** means the rating of Risk before consideration of implemented treatments.

**KPIs** means key performance indicators.

**Likelihood** means the chance of an event happening.

**OHS** means occupational health and safety.

**Operational Risks** means Risks associated with the normal business and day-to-day functions of the City including operational costs, workforce planning, asset maintenance and renewal, environmental hazards, delivery of Long Term Financial Plan, Asset Management Plan and Workforce Plan.

**Project Risks** means Risks associated with specific projects being delivered by the City including project management and delivery and site hazards.

**Residual Risk** means the rating for Risk after treatments have been considered.

**Risk** means the chance of something happening that will have an impact on objectives, categorised by the City as strategic, operational or project.

**Risk Appetite** has the meaning given in the Risk Management Strategy.

**Risk Assessment Matrix** means the adopted matrix set out in the Risk Management Framework.

**Risk Rating** means the rating of the risk determined with reference to Likelihood and Consequence, using the City's Risk Assessment Matrix.

**Risk Tolerance** has the meaning given in the Risk Management Strategy.

**Strategic Risks** means Risks associated with the City's achievements and its strategic and long-term objectives including compliance, financial management, organisational culture, integrity systems, protection from liability, sustainability, OHS, delivery of Strategic Community Plan and Corporate Business Plan.

**Treatment** means an action taken to reduce the Likelihood or Consequence of a risk eventuating (also known as a control).

## **APPENDIX 1: HOW TO CREATE A NEW RISK IN PULSE**

[Content to be drafted with screen shots]

## **APPENDIX 2: HOW TO MODIFY AN EXISTING RISK IN PULSE**

[Content to be drafted with screen shots]

## **APPENDIX 3: HOW TO CREATE A NEW TREATMENT IN PULSE**

[Content to be drafted with screen shots]

## **APPENDIX 4: HOW TO MODIFY AN EXISTING TREATMENT IN PULSE**

[Content to be drafted with screen shots]

## **APPENDIX 5: HOW TO LINK RISK AND CONTROL OWNERSHIP TO KPIs AND APPRAISALS**

[Content to be drafted with screen shots - consider will this be open access or something on Governance or P & C or management group can do?]

## **APPENDIX 6: HOW TO LINK RISK WITH ORGANISATIONAL PERFORMANCE INDICATORS**

[Content to be drafted with screen shots – consider will this be open access or something on Governance can do?]

# **RISK MANAGEMENT STRATEGY**



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Endorsed by the CEO: \_\_\_\_\_ Date: \_\_\_\_\_

## INTRODUCTION

### RISK MANAGEMENT

Risk management is a critical aspect of the City's corporate governance requirements and involves a continual process of review and assessment of both risks and controls to ensure the City achieves a balance between achieving its operational and strategic objectives and minimising adverse impact. To be sustainable and effective, risk management must be incorporated into all everyday activities and tasks.

The objectives of risk management include:

- Achievement of the City's strategic objectives and goals including Integrated Planning requirements;
- Compliance with legislation, regulations and policies;
- Ongoing health and safety of all City employees and other persons;
- Limited loss or damage to City assets;
- Quality and continuous improvement;
- Limited interruption to business continuity and reduce loss of corporate knowledge; and
- Positive reputation and perception of the City, Council and its officers.

### PURPOSE OF RISK MANAGEMENT STRATEGY

This Risk Management Strategy is a guideline for the development and embedding of a risk management culture at the City. It incorporates:

1. Council's annual statement regarding its Risk Appetite and Risk Tolerance for the upcoming financial year, within which the City will operate; and
2. An action plan for the City's risk management systems including in relation to:
  - a. Communication and training to ensure City officers have knowledge about the City's risk management processes including understanding of:
    - i. Risk-related corporate documents (Risk Management Policy, Risk Management Framework and Risk Management Procedure);
    - ii. Roles and responsibilities of Council, ELT and staff;
    - iii. Differences between strategic, operational and project risks; and
    - iv. Pulse software platform;
  - b. Development of an induction plan for new staff;
  - c. Initiatives to build a risk management culture including mechanisms for staff and organisational accountability;
  - d. Creation of a consistent approach to assessing and documenting Strategic Risks, Operational Risks and Project Risks; and
  - e. Creation of a consistent approach to assessing and documenting Project Risks.

## RELATIONSHIP WITH OTHER CORPORATE DOCUMENTS AND PROCESSES

This Risk Management Strategy supports and is supported by the City's following corporate documents:

**Risk Management Policy** sets out Council's commitment to effective risk management activities by the City as a component of its good governance practices. This policy is developed in accordance with that policy.

**Risk Management Framework** sets out the concepts and principles which define the City's risk management process.

**Risk Management Procedure** sets out requirements for City officers to undertake regular risk review practices and provides guidelines within which these should be completed.

**Corporate Performance Framework** sets out requirements for risk reporting to the Audit and Risk Committee, including relevant timeframes for completion of such reports.

**Governance Framework** sets out the principles and systems used by the City to achieve high standards of governance including transparency, strategic long-term planning and informed decision-making (for which risk management is a key component).

**Integrated Planning** includes risk considerations to ensure capacity to deliver short, medium and long term objectives.

**Internal audit** reviews the effectiveness of the City's operating systems, including risk management systems and is critical to ensuring successful risk management by monitoring compliance with risk management requirements to ensure risks are identified and treated, and that treatments are appropriately designed and implemented.

**KPIs and performance appraisals** include ensuring that risk owners are satisfying the City's risk management requirements in connection with their role.

## ROLES AND RESPONSIBILITIES

**Council and the Audit and Risk Committee** are responsible for meeting the City's strategic long-term objectives. In relation to the risk management of the City, their functions include:

- Monitoring and reviewing the overall performance of the City;
- Providing strategic direction and oversight for the delivery of services and other functions;
- Review and consideration of strategic risks and operational risks to ensure that sufficient measures are in place to avoid damage to the City;
- Acting as a forum for consideration of the City's internal audit function and oversee its planning, monitoring and reporting to ensure it operates effectively; and
- Assessing the effectiveness of, and monitor compliance with, the risk management framework.

The **Chief Executive Officer** is responsible for the overall co-ordination of departmental activities to enable a collaborative approach to service delivery and project management. The CEO coordinates Council and ELT's strategic planning as well as providing oversight of operational delivery. In relation to risk management, this includes review of the City's risk register (both strategic and operational risks) and oversight of the implementation of controls by City officers to ensure that both service and project delivery are aligned with the City's acceptable risk levels and are delivered in a way that reduces the City's risk exposure.

The **Executive Leadership Team and management team** are required to undertake regular reviews of strategic and operational risks within their respective teams, lead their business units to undertake risk assessment and mitigation activities, and oversee the implementation of controls. and measures relevant to their department.

**City officers** are all responsible for ensuring that:

- they consider risks and controls in all of their day-to-day activities;
- their performance of their functions reduces risk to the City and its stakeholders to the extent reasonably possible;
- complete updates in relation to the City's risk register, controls and tasks as and when required by their manager; and
- act with due care and skill, integrity and in accordance with expectations of supervisors, senior management and Council.

**Governance officers** will undertake ongoing reviews of the City's risk register to:

- Ensure review processes are being completed adequately;
- Ensure treatments are being identified and communicated with all relevant officers;
- Maintain oversight of changes to risk ratings and in particular escalation of a risk rating or prioritisation;
- Ensure information is reported to OHS representatives for allocation of appropriate resources and support; and
- Report to ELT.

## COUNCIL'S RISK APPETITE AND TOLERANCE

### RISK APPETITE

Council acknowledges that Risk is inherent in any organisation's business operations. Risk Appetite is the amount of risk the City is willing to accept in pursuit of its strategic objectives. On an annual basis, Council will undertake a Risk Appetite exercise to determine the City's thresholds for the upcoming financial year.

The overall level of Risk that Council accepts will meet one of the following criteria and be endorsed by the ELT.

#### **Risk averse (red)**

- No to low appetite for taking Risks.
- Avoid Risks and uncertainty; choose safest options.

#### **Open to moderate level of Risk (amber)**

- Moderate appetite for Risk; willing to consider potential Risks for reasonable reward.

#### **Eager for Risk (green)**

- Willing or eager to engage with Risks and choose options offering potentially high rewards.

Appendix 2 contains Council's Risk Appetite Statement.

### RISK TOLERANCE

Council's adopted Risk Tolerance establishes boundaries and thresholds within which the City can develop and deliver projects and services to the community.

The City's tolerance scale is set in accordance with the following:

#### **Low tolerance (red)**

- Zero to low tolerance for Risk.
- Cautious approach must be taken and Risk must be reduced to as low as reasonably possible.
- Avoid taking Risks where possible and if not, must ensure there are effective controls in place.
- Some Risk taking may be necessary due to the nature of the City's activities.

#### **Moderate (amber)**

- Moderate tolerance for Risk.
- Balanced and informed approach taken - willing to consider options that may incur risk where significant benefit is possible.
- Risk must be accepted with appropriate authorisations in place.
- Effective controls must be in place.

#### **High (green)**



- Willing to engage with Risk where potential for reward is high and/or where an aggressive approach is needed to deliver a key strategic objective.

The overall Risk Tolerance that Council accepts in respect of the City's core activities and key Risk areas will meet one of the following criteria.

Appendix 3 contains Council's Risk Tolerance position.

DRAFT

## STRATEGIES FOR RISK MANAGEMENT CULTURE

Appendix 1 sets out the City's draft Action Plan for developing and embedding a risk management culture. The plan includes the following key strategies, including officers responsible for the implementation of those and relevant timelines and will be finalised and endorsed by the CEO.

### Council

- Setting the risk management tone and objectives for the City.
- Overseeing the City's strategic, financial, operational, and reputational risks.
- Including risk management as a component of strategic planning process as elected members are ultimately accountable to the public for the City's performance.

### Staff knowledge and training

- Communicate benefits, principles and processes of risk management with all staff.
- Share risk related corporate documents with all staff.
- Ensure accessibility of risk related corporate documents in hard and soft formats.
- Conduct business unit risk workshops following adoption by Council and establishment of Pulse.
- Identify knowledge gaps and develop training where required – organisational, unit or one-on-one.
- Review external providers for organisation-wide training.
- Conduct business unit check ins to ensure ongoing knowledge and understanding.
- Develop check lists for assessment of Strategic Risks, Operational Risks and Project Risks.
- Identify key roles with risk responsibility and ensure adequate resourcing and support is provided.
- Develop "train the trainer" model to share responsibility of ensuring staff education across business units.

### New starter induction

- Develop induction program for new starters including:
  - Familiarisation with risk related corporate documents;
  - Training around risk requirements;
  - Training for Pulse; and
  - Setting clear expectations for ongoing risk management practices.
- Create 'induction pack' that can be shared with existing staff and new starters as an additional summary resource.

### ELT knowledge and oversight

- Develop regular ELT review process to share information and knowledge and embed accountability for risk management and consistency in approach across the organisation.
- Include risk management as a component of strategic planning process.
- Review staff feedback on risk management gained through appraisal process.

### Integrating risk management into strategic planning and management

- Develop check list for assessment of Strategic Risks that can be used by officers from concept design stage and ongoing.
- Determine risk related performance indicators as part of assessment of delivery of strategic objectives in connection with:
  - Business continuity and limited disruption to services;
  - Reduction in loss or damage to assets;
  - Positive public perception of Council; and
  - Achievement of staff KPIs.
- Include risk assessment as part of Long Term Financial Plan review and Annual Budget adoption processes.

#### **Integrating risk management into operational planning and management**

- Develop check list for assessment Operational Risks that can be used by officers from concept design stage and ongoing.
- Include risk assessment as part of approval sign off stage (through either Council or internal approval mechanisms).
- Embed risk assessment into procurement processes including prior to purchasing approval, in procurement plan and as part of tender evaluation.
- Determine risk related performance indicators as part of assessment of operational functions including in connection with:
  - Compliance with risk management systems;
  - Reduction in OHS incidents for staff, contractors and volunteers;
  - Attendance at risk related meetings, workshops and training opportunities;
  - Incorporation of whole of life planning at early stages; and
  - Staff participation in risk management processes within business areas.
- Include risk assessment as part of budget approval process.

#### **Integrating risk management into project planning and management**

- Develop check list for assessment of Project Risks that can be used by officers from concept design stage and ongoing.
- Include risk assessment as part of approval sign off stage at each point that a project progresses with manager/director approval requirements.
- Embed risk assessment into project management processes.
- Determine risk related performance indicators as part of assessment of operational functions including in connection with:
  - Management of project schedules;
  - Management and reduction in cost overruns; and
  - Contingency planning at early stages.
- Include risk assessment as part of budget approval process.
- Develop contractor induction program in relation to risk management culture.

#### **Staff accountability**

- Define expectations and requirements including relevant timeframes for reviews to be completed.
- Link risk related KPIs to all officers who have ownership of risk including:
  - Inclusion of risk as a monthly standing item in business unit meetings; and

- Staff attendance at risk related meetings, workshops and training opportunities.
- Link related related KPIs to all officers who have ownership of risk treatment implementation including in relation to reporting hazards and near misses.
- Include assessment of officer's implementation of risk management practices in performance appraisals.
- Include risk ownership as contractual requirement or within job position descriptions for roles which own risk and execution of risk management treatments.
- Establish reporting mechanisms for business units to report to their director or executive manager for oversight.
- Establish reporting mechanisms to ELT for organisational-wide oversight, interrogation of successes and challenges, ensure consistency and identify priorities.
- Implement reporting to Audit and Risk Committee in accordance with Corporate Performance Framework.

#### **Organisational culture**

- Incorporate risk assessment in all areas of decision-making.
- Adopt “no blame” approach to reporting on risk and treatments, including failures of treatments.
- Build risk responsibility into position descriptions, KPIs and performance appraisals.
- Share stories of successes and failures in relation to assessment and controls.
- Include risk as a standing monthly agenda item for business unit meetings, coordinator team meetings, management team meetings and ELT meetings to improve collaboration and communication across various levels.
- Identify and resource “risk management champions” across the organisation.
- Recognise staff showing leadership in risk management processes.
- Promote “continuous improvement” culture and encourage staff initiative in recognising areas for change or improvement.

#### **Audit and organisational accountability**

- Include risk assessment (including Tolerance) in Council reports.
- Include risk management outcomes in annual reports.
- Develop internal audit program for risk management processes.
- Undertake corrective actions where deficiencies are identified through internal review.
- Develop schedule of risk assessments for key organisational risk areas to support staff and ensure requirements are met, including:
  - Expenditure of large sums of money;
  - Procurement management;
  - Introducing significant change;
  - Management of sensitive issues;
  - OHS management practices;
  - Legal, legislative and regulatory compliance; and
  - Workforce planning.

## AREA SPECIFIC RISK MANAGEMENT PLANS

The City is a multi-faceted organisation with many areas having risk unique to that area, which can be both strategic and/or operational and which has a broader impact on the City's risk landscape as a whole.

These specific risk areas have been identified as follows:

- Information Technology;
- Workplace Health and Safety;
- Contractor induction and onboarding;
- Projects;
- Airport; and
- Events.

A specific risk management plan will be identified for each of these areas, and others as they are identified.



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**Consequence** means the outcome of an event.

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**Inherent Risk** means the rating of Risk before consideration of implemented treatments.

**KPIs** means key performance indicators.

**Likelihood** means the chance of an event happening.

**OHS** means occupational health and safety.

**Operational Risks** means Risks associated with the normal business and day-to-day functions of the City including operational costs, workforce planning, asset maintenance and renewal, environmental hazards, delivery of Long Term Financial Plan, Asset Management Plan and Workforce Plan.

**Project Risks** means Risks associated with specific projects being delivered by the City including project management and delivery and site hazards.

**Residual Risk** means the rating for Risk after treatments have been considered.

**Risk** means the chance of something happening that will have an impact on objectives, categorised by the City as strategic, operational or project.

**Risk Appetite** has the meaning given on page 6.

**Risk Assessment Matrix** means the adopted matrix set out in the Risk Management Framework.

**Risk Rating** means the rating of the risk determined with reference to Likelihood and Consequence, using the City's Risk Assessment Matrix.

**Risk Tolerance** has the meaning given on page 6.

**Strategic Risks** means Risks associated with the City's achievements and its strategic and long-term objectives including compliance, financial management, organisational culture, integrity systems, protection from liability, sustainability, OHS, delivery of Strategic Community Plan and Corporate Business Plan.

**Treatment** means an action taken to reduce the Likelihood or Consequence of a risk eventuating (also known as a control).

## APPENDIX 1: DRAFT ACTION PLAN

DRAFT

Strategy	Action	Timeframe	Status Update	Comments
Staff knowledge and training	Communicate benefits, principles and processes of risk management with all staff.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Share risk related corporate documents with all staff.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Ensure accessibility of risk related corporate documents in hard and soft formats.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Conduct business unit risk workshops following adoption by Council and establishment of Pulse.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Identify knowledge gaps and develop training where required – organisational, unit or one-on-one.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Review external providers for organisation-wide training.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Conduct business unit check ins to ensure ongoing knowledge and understanding.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Develop check lists for assessment of Strategic Risks, Operational Risks and Project Risks.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	

	Identify key roles with risk responsibility and ensure adequate resourcing and support is provided.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Develop “train the trainer” model to share responsibility of ensuring staff education across business units.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Maintain good safety culture and practices with staff		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
<b>New starter induction</b>	Develop induction program for new starters including: <ul style="list-style-type: none"> <li>• Familiarisation with risk related corporate documents;</li> <li>• Training around risk requirements;</li> <li>• Training for Pulse; and</li> <li>• Setting clear expectations for ongoing risk management practices.</li> </ul>		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Create ‘induction pack’ that can be shared with existing staff and new starters as an additional summary resource.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
<b>ELT knowledge and oversight</b>	Develop regular ELT review process to share information, knowledge and embed accountability for risk management		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	

	and consistency in approach across the organisation.			
	Include risk management as a component of strategic planning process.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Review staff feedback on risk management gained through appraisal process.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
<b>Integrating risk management into strategic planning and management</b>	Develop check list for assessment of Strategic Risks that can be used by officers from concept design stage and ongoing.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Determine risk related performance indicators as part of assessment of delivery of strategic objectives in connection with: <ul style="list-style-type: none"> <li>• Business continuity and limited disruption to services;</li> <li>• Reduction in loss or damage to assets;</li> <li>• Positive public perception of Council; and</li> <li>• Achievement of staff KPIs.</li> </ul>		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Include risk assessment as part of Long Term Financial Plan review		<input type="checkbox"/> Not started <input type="checkbox"/> In progress	



	and Annual Budget adoption processes.		<input type="checkbox"/> Completed	
<b>Integrating risk management into operational planning and management</b>	Develop check list for assessment Operational Risks that can be used by officers from concept design stage and ongoing.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Include risk assessment as part of approval sign off stage (through either Council or internal approval mechanisms).		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Embed risk assessment into procurement processes including prior to purchasing approval, in procurement plan and as part of tender evaluation.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Determine risk related performance indicators as part of assessment of operational functions in connection with: <ul style="list-style-type: none"> <li>• Compliance with risk management systems;</li> <li>• Reduction in OHS incidents for staff, contractors and volunteers;</li> <li>• Attendance at risk related meetings, workshops and training opportunities;</li> <li>• Incorporation of whole of life planning at early stages; and</li> <li>• Staff participation in risk management processes within business areas.</li> </ul>		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	

	Include risk assessment as part of budget approval process.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
<b>Integrating risk management into project planning and management</b>	Develop check list for assessment of Project Risks that can be used by officers from concept design stage and ongoing.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Include risk assessment as part of approval sign off stage at each point that a project progresses with manager/director approval requirements.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Embed risk assessment into project management processes.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	

	<p>Determine risk related performance indicators as part of assessment of operational functions in connection with:</p> <ul style="list-style-type: none"> <li>• Management of project schedules;</li> <li>• Management and reduction in cost overruns; and</li> <li>• Contingency planning at early stages.</li> </ul> <p>Include risk assessment as part of budget approval process.</p>		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Develop contractor induction program in relation to risk management culture.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
<b>Staff accountability</b>	Define expectations and requirements including relevant timeframes for reviews to be completed.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	<p>Link risk related KPIs to all officers who have ownership of risk including:</p> <ul style="list-style-type: none"> <li>• Inclusion of risk as a monthly standing item in business unit meetings; and</li> <li>• Staff attendance at risk related meetings,</li> </ul>		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	

	workshops and training opportunities.			
	Link related KPIs to all officers who have ownership of risk treatment implementation in relation to reporting hazards and near misses.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Include assessment of officer's implementation of risk management practices in performance appraisals.  Include risk ownership as contractual requirement or within job position descriptions for roles which own risk and execution of risk management treatments.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Establish reporting mechanisms for business units to report to their director or executive manager for oversight.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Establish reporting mechanisms to ELT for organisational-wide oversight, interrogation of successes and challenges, ensure consistency and identify priorities.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	

	Implement reporting to Audit and Risk Committee in accordance with Corporate Performance Framework.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
<b>Organisational culture</b>	Incorporate risk assessment in all areas of decision-making.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Adopt “no blame” approach to reporting on risk and treatments, including failures of treatments.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Build risk responsibility into position descriptions, KPIs and performance appraisals.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Share stories of successes and failures in relation to assessment and controls.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Include risk as a standing monthly agenda item for business unit meetings, coordinator team meetings, management team meetings and ELT meetings to improve collaboration and communication across various levels.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Identify and resource “risk management champions” across the organisation.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	

	Recognise staff showing leadership in risk management processes.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Promote “continuous improvement” culture and encourage staff initiative in recognising areas for change or improvement.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Staff maintaining compliance with risk policies, plans, framework and processes.			
<b>Audit and organisational accountability</b>	Include risk assessment (including Tolerance) in Council reports.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Include risk management outcomes in annual reports.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Develop internal audit program for risk management processes.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	
	Undertake corrective actions where deficiencies are identified through internal review.		<input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed	



	<p>Develop schedule of risk assessments for key organisational risk areas to support staff and ensure requirements are met, including:</p> <ul style="list-style-type: none"><li>• Expenditure of large sums of money;</li><li>• Procurement management;</li><li>• Introducing significant change;</li><li>• Management of sensitive issues;</li><li>• OHS management practices;</li><li>• Legal, legislative and regulatory compliance; and</li><li>• Workforce planning.</li></ul>		<p><input type="checkbox"/> Not started <input type="checkbox"/> In progress <input type="checkbox"/> Completed</p>	
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## APPENDIX 2: RISK APPETITE STATEMENT

Council acknowledges that Risk is inherent in any organisation's business operations. Risk Appetite is the amount of risk the City is willing to accept in pursuit of its strategic objectives. On an annual basis, Council will undertake a Risk Appetite exercise to determine the City's thresholds for the upcoming financial year.

The overall level of Risk that Council accepts will meet one of the following criteria and be endorsed by the ELT.

### **Risk averse (red)**

- No to low appetite for taking Risks.
- Avoid Risks and uncertainty; choose safest options.

### **Open to moderate level of Risk (amber)**

- Moderate appetite for Risk; willing to consider potential Risks for reasonable reward.

### **Eager for Risk (green)**

- Willing or eager to engage with Risks and choose options offering potentially high rewards.

On [insert date], Council adopted a [insert which level] Risk Appetite.

Council will consider options and pursue strategic and operational projects which result in the City minimising adverse impact while still achieving its goals for its sustainable benefit of the community.

### APPENDIX 3: RISK TOLERANCE POSITION

Council's adopted Risk Tolerance establishes boundaries and thresholds within which the City can develop and deliver projects and services to the community.

The City's tolerance scale is set in accordance with the following:

#### Low tolerance (red)

- Zero to low tolerance for Risk.
- Cautious approach must be taken and Risk must be reduced to as low as reasonably possible.
- Avoid taking Risks where possible and if not, must ensure there are effective controls in place.
- Some Risk taking may be necessary due to the nature of the City's activities.

#### Moderate (amber)

- Moderate tolerance for Risk.
- Balanced and informed approach taken - willing to consider options that may incur risk where significant benefit is possible.
- Risk must be accepted with appropriate authorisations in place.
- Effective controls must be in place.

#### High (green)

- Willing to engage with Risk where potential for reward is high and/or where an aggressive approach is needed to deliver a key strategic objective.

The overall Risk Tolerance that Council accepts in respect of the City's core activities and key Risk areas will meet one of the following criteria.

On [insert date] Council adopted the following Risk Tolerance position which was developed by the ELT and endorsed by the Audit and Risk Committee.

Category	Risk tolerance	Impact statement
<b>Financial</b>		
Long term financial sustainability		Council has [low/moderate/high] tolerance for Risk in relation to the City's long term financial sustainability. This means [overview of what is and is not tolerated].
Annual budget		Council has [low/moderate/high] tolerance for Risk in relation to the City's ability to deliver services and projects in accordance with the adopted Annual Budget. This means [overview of what is and is not tolerated].
<b>Governance</b>		
Legislative and regulatory compliance		Council has [low/moderate/high] tolerance for Risk in relation to breaches of the City's

		legislative and regulatory requirements. This means [overview of what is and is not tolerated].
Corporate governance		Council has [low/moderate/high] tolerance for Risk in relation to the City's ability to model strong corporate governance. This means [overview of what is and is not tolerated].
Integrity breaches (e.g. misconduct)		Council has [low/moderate/high] tolerance for Risk in relation to breaches of integrity including misconduct. This means [overview of what is and is not tolerated].
Human error or omission		Council has [low/moderate/high] tolerance for Risk in relation to human error and mistake including incorrect advice and delays in responding. This means [overview of what is and is not tolerated].
<b>ICT, Infrastructure and Assets</b>		
Information management		Council has [low/moderate/high] tolerance for Risk in relation to the effectiveness of the City's IT operating systems. This means [overview of what is and is not tolerated].
Cyber security		Council has [low/moderate/high] tolerance for Risk in relation to the City's IT safeguards. This means [overview of what is and is not tolerated].
Infrastructure		Council has [low/moderate/high] tolerance for Risk in relation to the quality and safety of the City's key assets and infrastructure. This means [overview of what is and is not tolerated].
<b>Deliver</b>		
Project delivery		Council has [low/moderate/high] tolerance for Risk in relation to City's ability to delivery key capital projects for the relevant financial year. This means [overview of what is and is not tolerated].
Service delivery and business continuity		Council has [low/moderate/high] tolerance for Risk in relation to the delivery of key City services. This means [overview of what is and is not tolerated].
Economic Development		Council has [low/moderate/high] tolerance for Risk in relation to economic growth initiatives in Kalgoorlie-Boulder. This means [overview of what is and is not tolerated].
<b>People and Culture</b>		
OHS		Council has [low/moderate/high] tolerance for Risk in relation to the safety and welfare of staff, contractors and/or members of the community. This means [overview of what is and is not tolerated].
Attraction and retention of staff		Council has [low/moderate/high] tolerance for Risk in relation to the ability of the City to attract

		and retain staff. This means [overview of what is and is not tolerated].
Organisational culture		Council has [low/moderate/high] tolerance for Risk in relation to the organisational culture of the City. This means [overview of what is and is not tolerated].
<i>Environment and Heritage</i>		
Environment		Council has [low/moderate/high] tolerance for Risk in relation to the natural environment. This means [overview of what is and is not tolerated].
Aboriginal Heritage		Council has [low/moderate/high] tolerance for Risk in relation to impact local Aboriginal heritage. This means [overview of what is and is not tolerated].
History and Heritage		Council has [low/moderate/high] tolerance for Risk in relation to local history and heritage. This means [overview of what is and is not tolerated].
<i>Reputation</i>		
Reputation and public perception		Council has [low/moderate/high] tolerance for Risk in relation to the City's reputation and public perception of it. This means [overview of what is and is not tolerated].
Stakeholder relationships		Council has [low/moderate/high] tolerance for Risk in relation to the City's relationships with key external stakeholders. This means [overview of what is and is not tolerated].

## **RISK APPETITE STATEMENT**

Council acknowledges that Risk is inherent in any organisation's business operations. Risk Appetite is the amount of risk the City is willing to accept in pursuit of its strategic objectives. On an annual basis, Council will undertake a Risk Appetite exercise to determine the City's thresholds for the upcoming financial year.

The overall level of Risk that Council accepts will meet one of the following criteria and be endorsed by the ELT.

### **Risk averse (red)**

- No to low appetite for taking Risks.
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### **Open to moderate level of Risk (amber)**

- Moderate appetite for Risk; willing to consider potential Risks for reasonable reward.

### **Eager for Risk (green)**

- Willing or eager to engage with Risks and choose options offering potentially high rewards.

On [insert date], Council adopted a [insert which level] Risk Appetite.

Council will consider options and pursue strategic and operational projects which result in the City minimising adverse impact while still achieving its goals for its sustainable benefit of the community.



## COUNCIL RISK TOLERANCE POSITION

Council's adopted Risk Tolerance establishes boundaries and thresholds within which the City can develop and deliver projects and services to the community.

The City's tolerance scale is set in accordance with the following:

### Low tolerance (red)

- Zero to low tolerance for Risk.
- Cautious approach must be taken and Risk must be reduced to as low as reasonably possible.
- Avoid taking Risks where possible and if not, must ensure there are effective controls in place.
- Some Risk taking may be necessary due to the nature of the City's activities.

### Moderate (amber)

- Moderate tolerance for Risk.
- Balanced and informed approach taken - willing to consider options that may incur risk where significant benefit is possible.
- Risk must be accepted with appropriate authorisations in place.
- Effective controls must be in place.

### High (green)

- Willing to engage with Risk where potential for reward is high and/or where an aggressive approach is needed to deliver a key strategic objective.

The overall Risk Tolerance that Council accepts in respect of the City's core activities and key Risk areas will meet one of the following criteria.

On [insert date] Council adopted the following Risk Tolerance position which was developed by the ELT and endorsed by the Audit and Risk Committee.

Category	Risk tolerance	Impact statement
Financial		
Long term financial sustainability		Council has [low/moderate/high] tolerance for Risk in relation to the City's long term financial sustainability. This means [overview of what is and is not tolerated].
Annual budget		Council has [low/moderate/high] tolerance for Risk in relation to the City's ability to deliver services and projects in accordance with the adopted Annual Budget. This means [overview of what is and is not tolerated].
Governance		

Legislative and regulatory compliance		Council has [low/moderate/high] tolerance for Risk in relation to breaches of the City's legislative and regulatory requirements. This means [overview of what is and is not tolerated].
Corporate governance		Council has [low/moderate/high] tolerance for Risk in relation to the City's ability to model strong corporate governance. This means [overview of what is and is not tolerated].
Integrity breaches (e.g. misconduct)		Council has [low/moderate/high] tolerance for Risk in relation to breaches of integrity including misconduct. This means [overview of what is and is not tolerated].
Human error or omission		Council has [low/moderate/high] tolerance for Risk in relation to human error and mistake including incorrect advice and delays in responding. This means [overview of what is and is not tolerated].
ICT, Infrastructure and Assets		
Information management		Council has [low/moderate/high] tolerance for Risk in relation to the effectiveness of the City's IT operating systems. This means [overview of what is and is not tolerated].
Cyber security		Council has [low/moderate/high] tolerance for Risk in relation to the City's IT safeguards. This means [overview of what is and is not tolerated].
Infrastructure		Council has [low/moderate/high] tolerance for Risk in relation to the quality and safety of the City's key assets and infrastructure. This means [overview of what is and is not tolerated].
Deliver		
Project delivery		Council has [low/moderate/high] tolerance for Risk in relation to City's ability to delivery key capital projects for the relevant financial year. This means [overview of what is and is not tolerated].
Service delivery and business continuity		Council has [low/moderate/high] tolerance for Risk in relation to the delivery of key City services. This means [overview of what is and is not tolerated].
Economic Development		Council has [low/moderate/high] tolerance for Risk in relation to economic growth initiatives in Kalgoorlie-Boulder. This means [overview of what is and is not tolerated].
People and Culture		
OHS		Council has [low/moderate/high] tolerance for Risk in relation to the safety and welfare of staff, contractors and/or members of the community. This means [overview of what is and is not tolerated].

Attraction and retention of staff		Council has [low/moderate/high] tolerance for Risk in relation to the ability of the City to attract and retain staff. This means [overview of what is and is not tolerated].
Organisational culture		Council has [low/moderate/high] tolerance for Risk in relation to the organisational culture of the City. This means [overview of what is and is not tolerated].
<i>Environment and Heritage</i>		
Environment		Council has [low/moderate/high] tolerance for Risk in relation to the natural environment. This means [overview of what is and is not tolerated].
Aboriginal Heritage		Council has [low/moderate/high] tolerance for Risk in relation to impact local Aboriginal heritage. This means [overview of what is and is not tolerated].
History and Heritage		Council has [low/moderate/high] tolerance for Risk in relation to local history and heritage. This means [overview of what is and is not tolerated].
<i>Reputation</i>		
Reputation and public perception		Council has [low/moderate/high] tolerance for Risk in relation to the City's reputation and public perception of it. This means [overview of what is and is not tolerated].
Stakeholder relationships		Council has [low/moderate/high] tolerance for Risk in relation to the City's relationships with key external stakeholders. This means [overview of what is and is not tolerated].

Risk Category	Risk Description	Causes	Consequences	Directorate
Workforce	Inadequate or ineffective OHS systems	Inadequate treatment of workplace risks including return to work programs, lack of trading and education; missing or poor safety processes or practices	Incident in the workplace; workplace injury death or disease; non-compliance with regulatory requirements; legal liability; financial loss; negative organisational culture	People and Culture
Workforce	Lack of adequate hazard identification and reporting culture	Failure to report, or report promptly and accurately; ineffective processes for risk assessment and identification; inadequate staff training; poor safety culture	Incident in the workplace; workplace injury death or disease; non-compliance with regulatory requirements; legal liability; financial loss; negative organisational culture	People and Culture
Workforce	Inadequate or ineffective OHS systems at Golf Course	Inadequate treatment of workplace risks including return to work programs, lack of trading and education; missing or poor safety processes or practices; non compliance with PPE requirements	Incident in the workplace; workplace injury death or disease; non-compliance with regulatory requirements; legal liability; financial loss; negative organisational culture	Corporate and Commercial
Workforce	Inadequate or ineffective OHS systems at Oasis	Inadequate treatment of workplace risks including return to work programs, lack of trading and education; missing or poor safety processes or practices; non compliance with PPE requirements	Incident in the workplace; workplace injury death or disease; non-compliance with regulatory requirements; legal liability; financial loss; negative organisational culture	Corporate and Commercial
Workforce	Inadequate or ineffective OHS systems at GAC	Inadequate treatment of workplace risks including return to work programs, lack of trading and education; missing or poor safety processes or practices; non compliance with PPE requirements	Incident in the workplace; workplace injury death or disease; non-compliance with regulatory requirements; legal liability; financial loss; negative organisational culture	Community Development
Workforce	Inadequate or ineffective OHS systems at Depot	Inadequate treatment of workplace risks including return to work programs, lack of trading and education; missing or poor safety processes or practices; non compliance with PPE requirements	Incident in the workplace; workplace injury death or disease; non-compliance with regulatory requirements; legal liability; financial loss; negative organisational culture	Engineering
Workforce	Inadequate human resources (216840)	Unskilled employees in HR roles; inadequate operating systems; insufficient staff resources;	Services not meeting community expectations; lack of productive workforce; inability to deliver services to standard expected/ needs of community; increase in staff turnover; high volume load; key roles carried out by inexperienced or unskilled staff; poor organisational culture	People and Culture
Workforce	Lack of adequately skilled and productive workforce	Underskilled or inexperienced employees being employed	Services not meeting community expectations; lack of productive workforce; inability to deliver services to standard expected/ needs of community; increase in staff turnover; high volume load; key roles carried out by inexperienced or unskilled staff; poor organisational culture	People and Culture
Workforce	Insufficient organisational capacity to support the City's growth and/or service delivery requirement	CONTENT TBD	CONTENT TBD	People and Culture
Workforce	Inability to attract and retain key talented staff	Difficulty finding staff accommodation; organisational culture issues; insufficient resources to meet recruitment demand; competition with other industries including local mining industry salaries; reputation/public perception of City as employer and organisation	Services not meeting community expectations; lack of productive workforce; inability to deliver services to standard expected/ needs of community; increase in staff turnover; high volume load; key roles carried out by inexperienced or unskilled staff	People and Culture
Workforce	Loss of corporate knowledge and skilled resources when key staff leave	Insufficient processes for handover; poor record keeping	Poor organisational culture; reduced productivity; high volume load; key roles carried out by inexperienced or unskilled staff	People and Culture
Workforce	Aging workforce	CONTENT TBD	CONTENT TBD	People and Culture
Workforce	Risk to staff safety (216981)	Threatening behaviour from clients or customers due to mental health issues or otherwise; customer dissatisfaction	Increase in staff WHS claims; increase in EAP support claims; increase in staff turnover; poor organisational culture	People and Culture
Workforce	Psychological Hazards in the Workplace (271788)	CONTENT TBD	CONTENT TBD	People and Culture
Workforce	Failure to identify and control psychological hazards in the workplace resulting in	CONTENT TBD	Increase in staff WHS claims; increase in EAP support claims; increase in staff turnover; poor organisational culture	People and Culture

Workforce	Culture and values not aligned to organisational outcomes and priorities	Lack of defined culture and values; inadequate change management; leadership team and staff turnover; failure to processes and procedures; lack of role clarity; poor communication of desired culture; failure to embed consistent communication, engagement and consultation across the organisation; inconsistent decision making and application of policies/procedures/management guidelines	Reputation damage for City as an employer and service provider; reduced performance and inability to deliver services effectively; difficulty attracting and retaining staff; increased staff turnover	People and Culture
Workforce	Sexual Harassment and/or Discrimination in the Workplace (271789)	CONTENT TBD	Increase in staff WHS claims; increase in adverse action claims; increase in EAP support claims; increase in staff turnover; poor organisational culture	People and Culture
Workforce	Failure to report or inadequate reporting of sexual harassment or discrimination in the workplace	Staff distrust or uncertainty around reporting systems and processes	Increase in staff WHS claims; increase in adverse action claims; increase in EAP support claims; increase in staff turnover; poor organisational culture	People and Culture
Governance	Poor reputation and public perception of Council/the City	Lack of transparency and accountability in respect of decision making	Negative reputation and public perception; distrust and poor relationships with community and stakeholders; lack of confidence in ability to deliver projects and services; increase in political activism; increase in complaints to the Department	Governance
Governance	Dysfunction of Council (217003)	Distrust between Council members; different political motivations and agendas; lack of effective communication between Council members; lack of role clarity; community perception	Inability to function properly; legal liability; WHS (psychosocial safety) hazards; Negative reputation and public perception; distrust and poor relationships with community and stakeholders; lack of confidence in ability to deliver projects and services; increase in political activism ; increase in complaints to the Department	Governance
Governance	Loss or misuse of corporate records (216988)	Lack of education around access to IT and information; failure to embed integrity framework and other policies and procedures in organisation; failure to embed record keeping plan in organisation; lack of IT resourcing to restrict unauthorised access; staff error in record keeping or access; staff fraud/negligence; lack of IT integrity with oversight and early identification of unauthorised access; time pressures for staff meaning record keeping is not a priority	Breach of State Records Act 2000; confidentiality breach; legal liability; negative reputation or public perception	Governance
Governance	Loss from theft (216831)	CONTENT TBD	Financial loss; PSC/CCC mandatory reporting requirements for staff found to have stolen from the City; insurance claim; police reporting and prosecution	Governance
Governance	Theft/Damage/inappropriate use of Council plant and fleet due to a criminal act, accident or misconduct	Unauthorised entry into the City's properties; criminal or negligent behaviour of staff	Financial loss; PSC/CCC mandatory reporting requirements for staff found to have stolen from the City; insurance claim; police reporting and prosecution	People and Culture
Governance	FINANCIAL	CONTENT TBD	CONTENT TBD	Governance
Governance	Insurance risks (216999)			
Governance	Lack of knowledge by City officers trying to deal with potential insurance claims and not reporting the exposure to the insurer	Lack of knowledge, education and training; lack of role clarity and determination of officers with insurance-related responsibilities.	Insurer not notified early enough of potential claim may decline cover; legal liability; financial loss; reputation damage	Corporate and Commercial
Governance	Inappropriate/inadequate insurance cover	Lack of knowledge; lack of role clarity and authority; inaccurate asset valuations; incorrect information; limited choices in insurance options	Legal liability; financial loss; reputation damage	Corporate and Commercial
Governance	Mismanagement of risk register (216826)			
Governance	Lack of regular monitoring and review of organisational risks and controls	Insufficient training and education; insufficient processes and procedures; poor culture around risk management	Vulnerability to risks occurring; legal liability; insurance risk; non compliance risks	Governance
Governance	Failure to maintain Goldfields Oasis Risk Register (273753)	Insufficient training and education; insufficient processes and procedures; poor culture around risk management	Vulnerability to risks occurring; legal liability; insurance risk; non compliance risks	Corporate and Commercial
Governance	Failure to maintain Kalgoorlie-Boulder Airport Risk Register (273754)	Insufficient training and education; insufficient processes and procedures; poor culture around risk management	Vulnerability to risks occurring; legal liability; insurance risk; non compliance risks	Corporate and Commercial
Governance	Entry into contracts on terms not favourable to the City			

Governance	Entry into contracts, memorandums of understanding and heads of agreement on terms that are not favourable to the City, or which the City is or may be unable to comply with	Lack of knowledge, skill and training; high volume work load leading to lack of time to properly consider contract; not identifying need for or obtaining for legal advice; lack of knowledge or understanding about authority to bind the City	Legal liability, financial loss; reputational damage; inability to meet service delivery expectations	Governance
Governance	Inadequate or inappropriate scope of work specifications to meet the City's need	Failure to consult with other business units about organisation-wide scope of work specifications or needs; lack of knowledge, skill or training; high volume work load leading to lack of time to properly consider contract	Legal liability; financial loss; reputational damage; inability to meet service delivery expectations; increase in contracts, contractors and cost for works that should have been consolidated	Finance
Governance	Mismanagement of delegations and authorisations/appointments (273748)	CONTENT TBD	CONTENT TBD	Governance
Governance	Employees acting outside of or without delegation/authorisation	Lack of understanding, training or education; failure to embed organisation-wide understanding of policy and LGA requirements; failure of management/oversight of officers	Non compliance of City and officer; negative reputation and public perception; legal liability	Governance
Governance	Errors in management of delegated authority and authorisations/appointment	Lack of knowledge, training or education; staff administrative error; insufficient process or procedures	Non compliance of City and officers; negative reputation and public perception; legal liability	Governance
Governance	Inefficient business processes and systems	Failure to breakdown organisational silos and lack of collaboration between business units; paper based or manual processes; lack of IT resources, strategic plan and roadmap to deliver software upgrades to meet organisational needs; insufficient processes and procedures; staff lacking knowledge or desire to innovate or improve processes and systems	Inefficient or ineffective performance; reduced service and project delivery; reputational damage in the community; poor organisational culture; compliance impact; integrity system control impaired; impact on planning ability	Governance
Governance	Non compliance with Governance Framework	Lack of knowledge, education and training	Department intervention; non-compliance with regulatory requirements; dysfunction of Council and the City	Governance
Governance	Council representative/staff with an actual or perceived interest (pecuniary or non-pecuniary) being involved in Council Decision Making	Inadequate conflict of interest management; lack of knowledge, education and training	Breach of Local Government Act; department investigation; reputational damage; poor decision making.	Governance
Governance	Non compliance with Code of Conduct, frameworks, policies and legislative requirements (216984)	Lack of knowledge, education and training; failure to embed compliance-culture in the organisation	Breach of Local Government Act; department investigation; reputation damage; poor organisational culture; poor decision making; increase in staff turnover	Governance
IT and cyber security	Breach of software licensing agreements (216989)	Lack of knowledge, education and training. Computers do not have sufficient firewalls to download new software. T+C's of vendors need to be published for use.	Financial loss; compromised security of data; legal liability; loss of staff productivity; decrease in ability to deliver services; breach of legislative requirements regarding privacy and data protection. Information is not the domain of the City.	Corporate and Commercial
IT and cyber security	User error in procurement and current system user at published for use.	Lack of knowledge, education and training. Computers do not have sufficient firewalls to download new software. T+C's of vendors need to be published for use.	Financial loss; compromised security of data; legal liability; loss of staff productivity; decrease in ability to deliver services; breach of legislative requirements regarding privacy and data protection. Information is not the domain of the City.	Corporate and Commercial
IT and cyber security	Software installed above user licence limits	Lack of knowledge or oversight of numbers already; failure to maintain accurate and accessible records	Legal liability; financial loss; ineffective operating systems; reputational damage	Corporate and Commercial
IT and cyber security	Loss of IT through cyber attack (216996)	Lack of attention to detail and general awareness of phishing emails.	CONTENT TBD	Corporate and Commercial
IT and cyber security	User error	Lack of attention to detail and general awareness of phishing emails.	CONTENT TBD	Corporate and Commercial
IT and cyber security	Computer breakdown and technology issues	Aging hardware; incorrect set up and usage of hardware and software; inadequate IT staff and asset resources	Inefficient workplace systems; lack of productive work force; increase in staff turn over; decrease in ability to deliver services	Corporate and Commercial
IT and cyber security	Hacking risks	Failure of Tier 1 systems	Financial loss; compromised security of data; legal liability; loss of staff productivity; decrease in ability to deliver services; breach of legislative requirements regarding privacy and data protection	Corporate and Commercial
IT and cyber security	Lack of preparedness/failure to update and advance technology (216830)	Council not keeping up to date with technology resulting in outdated systems; inadequate IT resources to implement new technology and operating systems; lack of strategic plan for IT resourcing	Inefficient workplace systems; lack of productive work force; increase in staff turn over; decrease in ability to deliver services; poor information integration	Corporate and Commercial



Financial management	Unauthorised or inappropriate investment decisions (217005)	Lack of training or knowledge of Local Government Act; lack of role clarity regarding who makes investment decisions	Lower returns on investment; non compliance with regulatory requirements; financial loss	Finance
Financial management	Financial loss			Finance
Financial management	Fraudulent transactions through creditor or payroll system (217006)	Fraudulent transactions through supplier payments, unauthorised bank details, pay rate changes, ghost employees, salary packaging or overtime payments	Financial loss; non compliance with regulatory requirements	Finance
Financial management	Incorrect calculations and billing (216982)	Calculations for sundry debtors, rates and services and water are incorrect	Financial loss; reputation damage	Finance
Financial management	City's annual financial statement is inaccurate/invalid/incomplete (217000)	Financial mis-statement due to errors in financial reporting, reporting structures and poor structure of existing chart of accounts	Regulatory non compliance; negative reputation and public perception	Finance
Financial management	Non compliance with procurement policy, framework and procedures (216843)	Lack of knowledge, education and training; failure to embed procurement systems in the organisation; inconsistent approach to procurement; poor deadline management resulting in rushing procurement stages	Cost over-runs; exposure to legal and financial liability; reputational damage; inability to meet service delivery expectations	Finance
Financial management	Unstable or unsustainable financial position (216979)			Finance
Financial management	Poor financial modelling	Poor skills or knowledge based on financial management in Local Government	Unsustainable or unstable financial position, poor financial performance	Finance
Financial management	Non delivery on budget 216987	Poor skills or knowledge based on financial management in Local Government; unrealistic expectations on service/project delivery leading to inaccurate budgeting; uncertainty over external funding; changing compliance requirements;	Ongoing operational costs and cost shifting resulting in budget overruns	Finance
Financial management	Loss of revenue due to large areas of non-ratable land and other concessions	What is the cause?	Financial loss; poor financial performance	Finance
Financial management	Bad and outstanding debt levels	Debtors not paying for rates; services or supply on time or defaulting on debt; delays or inaction in managing debt and debtors including debt recovery	Financial loss; poor financial performance; reputation damage	Finance
Financial management	Fall in own source of revenue and/or reliance on grant funding	What is the cause?	Financial loss; poor financial performance; reputation damage	Finance
Financial management	Inability for Council to increase revenue due to regula	Regulatory restrictions; unsuccessful or inadequate advocacy for the City/local governments	Unsustainable or unstable financial position, poor financial performance	Finance
External conditions	Downturn in economic outlook of the country, state and city resulting in reduced Council revenue	Global, country and state causes including war and resource pricing	Failure to grow services because of changes to market conditions; decrease in ability to deliver services and projects; inability to attract and retain staff	OCEO
External conditions	Climate change impacts (temperature, rainfall, fire)	Lack of strategic planning; insufficient access to climate change resources	Council operations and the community impacted; limitations on development and regional growth	Engineering
External conditions	Failure to plan and assist in mitigating climate change impacts	Lack of strategic planning; insufficient access to climate change resources	Council operations and the community impacted; limitations on development and regional growth	Engineering
	Failure to embed sustainable practices within the organisation and community	Lack of staff training and awareness; lack of sustainability policy or framework; competing priorities including cost pressures mean less sustainable choices are made; insufficient proactivity and leadership in community.	Negative reputation and public perception; higher financial costs in the long term; increase in pressures on waste services; impaired long term planning; long term financial loss	Engineering
External conditions	External conditions	Global, country and/or state causes; critical localised infrastructure failure	Impact on normal community activities; pressure on public health system; service delivery reduced; reduced revenue opportunities and sources	Engineering
External conditions	Pandemic/Health Emergency affecting region and sta	Global, country and/or state causes; critical localised infrastructure failure	Inability to maintain essential Council services; reduction in delivery of essential services	Engineering
External conditions	Staff losses including key person loss due to illness, quarantine or other health related losses; key person risk to critical team member; cross-contamination of staff	Global, country and/or state causes; critical localised infrastructure failure	Inability to maintain essential Council services; reduction in delivery of essential services	People and Culture
Function, services and infrastructure	Lack of suitable land supply and zoned land (216832)	State ownership or other restrictions in land use; unresolved native title claims; restrictive planning schemes and policies	Decrease in ability to deliver services and projects; long term financial instability and unsustainability; loss of community diversity and size	Development and Growth
Function, services and infrastructure	Limitation on regional growth and development	State ownership or other restrictions in land use; unresolved native title claims; restrictive planning schemes and policies	Decrease in ability to deliver services and projects; long term financial instability and unsustainability; loss of community diversity and size	Development and Growth

Function, services and infrastructure	Limitation of the City's ability to meet the top 10 key areas of priority as per the Strategic Community Plan	Lack of cohesive and consistent strategic planning by officers and elected members; inadequate information provided to Council; competing priorities; financial limitations	Decrease in ability to deliver services and projects; long term financial instability and unsustainability; negative reputation and public perception	OCEO
Function, services and infrastructure	Inability to meet community needs			OCEO
Function, services and infrastructure	Service levels in regards to key infrastructure not being met	Absence of or poor service level agreements, inavailability of plant or fleet	Increase in financial cost to the City; degradation of asset condition; injury; negative reputation and public perception; insurance risk (higher insurance costs or no insurance)	OCEO
Function, services and infrastructure	Inavailability of plant and/or fleet	Plant and equipment not available due to poor maintenance, not in safe working order, premature end of asset life or downtime; competing priorities	Decrease in ability to deliver projects; negative reputation and public perception	Engineering
Function, services and infrastructure	Projects not delivered to quality, time or budget	Lack of planning for project and service delivery; insufficient project management staff resources; failure to consider long term costs or costs following completion	Negative reputation and public perception; increase in work volume for staff; poor organisational culture; decrease in ability to attract and retain staff; financial loss due to cost increases; legal liability	Engineering
Function, services and infrastructure	Poor service delivery to the community	Lack of planning for project and service delivery; insufficient project management staff resources; insufficient staff resourcing; inability to attract key personnel; failure to embed performance and service delivery culture; financial cost; competing priorities; failure to adequately budget for service; failure to engage with community about needs and expectations	Negative reputation and public perception; loss of diversity and size of community; long term financial instability; increase in work volume for staff; poor organisational culture; decrease in ability to attract and retain staff; financial loss due to cost increases; legal liability	OCEO
Function, services and infrastructure	Function, services and infrastructure	Insufficient long term strategic planning; lack of collaboration within organisation and with external stakeholders; insufficient infrastructure and asset management plans to support growth; short term reactivity impacting longer term planning; lack of land use planning; lack of community support for delivery of growth opportunities; lack of innovation in exploring development opportunities; poor marketing	Unable to attract business to the region leading to poor economic development resulting in reduced revenue and business activity; reliance on mining industry; lack of diversity in local economy; reputational damage; stakeholder relationship damage; reduced organisational performance	OCEO
Function, services and infrastructure	Failure to be a desirable place to live	Failure to create local employment opportunities; failure to market Kalgoorlie-Boulder as a place to visit and live; lack of services to meet community needs; housing availability and affordability; failure to establish positive perception of Kalgoorlie-Boulder; regional location and distance from other cities; failure to address community safety concerns	Lack of economic growth and diversity in people and business; lack of opportunity to access grants and funding for project; inability to attract key staff; ongoing community safety concerns	Development and Growth
Function, services and infrastructure	Failure to maintain effective communications and relationships (23827)			Community Development
Function, services and infrastructure	Inaccurate or invalid information being distributed to the community via various forums/platforms (social media, blogs, websites, news (radio and television)	Failure to embed communications protocol in organisation resulting in unauthorised contact with media; inaccurate information shared by officers and elected members; inconsistency in media approach	Distrust within the community; poor perception and reputation	Community Development
Function, services and infrastructure	Failure to meet stakeholder needs (248481)	Lack of engagement with stakeholders; lack of understanding of stakeholder needs; competing priorities; reputation and community perception of the City; lack of community understanding on local government role and functions; lack of appropriate and targeted engagement with relevant sectors; competing priorities	Distrust within the community; poor perception and reputation; Poor relationships with community, government and private sector; stronger political activism and increased contact with elected members;	Community Development
Function, services and infrastructure	Failure to maintain effective communications between administration and elected members	Delays in officers responding to EM requests; incorrect information provided to EMs	Inconsistent communications approach across organisation; increase in elected member distrust and relationship break down	Governance
Function, services and infrastructure	Failure to build and optimise strong relationships with third parties including local governments and stakeholders	Lack of engagement with stakeholders; time pressures limiting ability to focus on networking opportunities; failure to consider partnership opportunities	Increase in cost, volume and demands on the City as a single entity delivering projects or services or accessing resources for which cost and resources could be shared; impaired service delivery	OCEO

Function, services and infrastructure	Ineffective emergency management	Lack of planning and documented procedures and plans; lack of role clarity; insufficient stakeholder engagement; inadequate training and knowledge for key response staff; prioritisation of resources or lack of sufficient resources to meet needs (eg generators)	Decrease in ability to respond effectively to emergencies; community and stakeholder distrust; damage to assets; negative reputation and public perception; loss of revenue	OCEO
Function, services and infrastructure	Council not being able to restore operations in the event of an unforeseen natural disaster	Generator dependence in case of power outage; OHS implications for staff; competing priorities and re-deployment of resources for emergency response; poor engagement with stakeholders	Loss of revenue; customer dissatisfaction; data loss; productivity reduction	OCEO
Function, services and infrastructure	Inadequacy or non-compliance in exercise of regulatory functions			Governance
Function, services and infrastructure	Inadequate/non compliant regulatory inspections (216825)	Unskilled staff or fraudulent activities	Legal liability of compensation, statutory fines, reputational damage, missed revenue from raising incorrect development contributions, conditions of consent not being enforced; increased insurance costs (professional indemnity insurance)	Development and Growth
Function, services and infrastructure	Inadequate/non compliant application decisions (216825)	Lack of knowledge, training or education; staff administrative error; insufficient process or procedures	Legal liability of compensation, statutory fines, reputational damage, missed revenue from raising incorrect development contributions, conditions of consent not being enforced; increased insurance costs (professional indemnity insurance)	Development and Growth
Function, services and infrastructure	Risk of/injury to community members due to poor condition of Council property (217004)	Potential Hazards not being identified/actioned at sporting grounds, parks, playgrounds, public buildings, pavilions, and halls impacting the community; low level of inspections and risk assessments being undertaken; lack of asset management plan	Injury or health complications to the community; reputational damage/poor public perception; financial loss; legal liability; insurance risk (higher cost or no insurance)	Engineering
Function, services and infrastructure	Ineffective asset management plan and systems	Lack of asset management plan; short term and reactive decision making regarding asset maintenance and replacement; competing priorities; insufficient funding; large number of assets compared to rates base; lack of historic action and proactivity resulting in significant asset management needs in small space of time; aging assets; lease terms (maintenance and repair) not complied with by third parties and not pursued actively by the City	Financial loss; reputation damage and community distrust; insurance implications (higher cost or no insurance offered); inability to delivery projects and services; impaired long term financial and strategic planning	Engineering
Function, services and infrastructure	Existing assets fail to meet the minimum requirements for current and future growth and aging assets with inadequate provisioning for repair and replacement	Lack of asset management plan; short term and reactive decision making regarding asset maintenance and replacement; competing priorities; insufficient funding; large number of assets compared to rates base; lack of historic action and proactivity resulting in significant asset management needs in small space of time; aging assets; lease terms (maintenance and repair) not complied with by third parties and not pursued actively by the City	Financial loss; reputation damage and community distrust; insurance implications (higher cost or no insurance offered); inability to delivery projects and services; impaired long term financial and strategic planning	Engineering
Function, services and infrastructure	Public health affected by inadequate waste management	Failure within sewer network resulting in sewer overflows; Failure of South Boulder Waste Water Treatment Plan; Contaminated wastewater effluent reaching the recycled water network; delays in collection of putrescible waste; spillage of waste in public area; mechanical error; delays in contractor engagement;	Injury or health complications to the community; legal liability; negative reputation and public perception; financial loss in rectification works	Engineering
Function, services and infrastructure	Break down of waste collection through uncontrolled transport (containment) and/or disposal and/or uncontrolled sewer overflows	Failure within sewer network resulting in sewer overflows; Failure of South Boulder Waste Water Treatment Plan; Contaminated wastewater effluent reaching the recycled water network; delays in collection of putrescible waste; spillage of waste in public area; mechanical error; delays in contractor engagement;	Injury or health complications to the community; legal liability; negative reputation and public perception; financial loss in rectification works	Engineering





Department of Energy, Mines,  
Industry Regulation and Safety



## Industry Bulletin 158

# Building Amendment Regulations 2023

### Commencement and transition

The Building Amendment Regulations 2023 (Amendment Regulations) will implement decisions from the Government's [Decision Paper – Swimming Pool and Safety Barrier Control \(Decision Paper\)](#) published in 2021.

The Amendment Regulations were published on 20 December 2023 on the [Western Australian legislation website](#). To allow sufficient time for local government and industry administrative arrangements and for up-dated information to be provided to the public, the bulk of the amendments will commence operation from 21 June 2024 (six months after publication).

Provisions commencing immediately from 21 December 2023 are those providing the manner for authorising contracted persons to inspect swimming pool barriers and associated transitional arrangements for those currently authorised, and the boundary barrier alternative compliance option.

### What's new?

The [Building Amendment Regulations 2023](#) make various reforms to the swimming pool and safety barrier requirements in the [Building Regulations 2012](#) (the Building Regulations).

#### Spa Baths – amended definition of *private swimming pool*

- ▶ Regulation 3 of the Building Regulations is amended to put beyond doubt that spa-baths are excluded from the definition of a 'private swimming pool' and therefore are not subject to swimming pool and safety barrier regulatory requirements, clarifying the current interpretation.
- ▶ Spa-pools are specifically included in the definition, ensuring they continue to be subject to the swimming pool and safety barrier regulatory requirements.

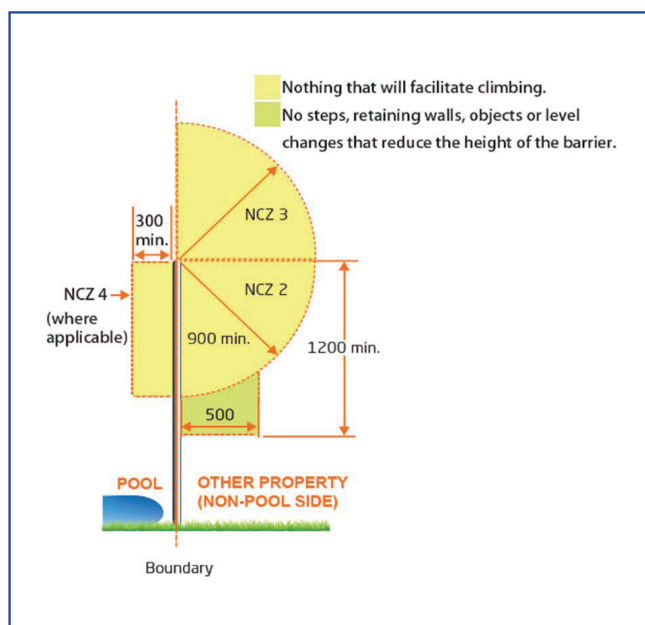
#### Clarifying *authorised person* provisions for contractors

- ▶ New regulations implement a specific and separate manner for local governments to appoint a contractor (private practitioners and employees of other local governments) as an authorised person for the purpose of conducting safety barrier inspections.
- ▶ Regulation 4A of the Building Regulations prescribes the manner of authorisation in which these persons (contractors) can be appointed for the purpose of section 93(2)(d) of the *Building Act 2011* (the Building Act), and regulation 4B of the Building Regulations provide for identity cards to be issued to these persons (aligned with the existing authorised person provisions of Part 8 Division 2 of the Building Act).
- ▶ All contractors with current authorisation will be re-authorised under the new provisions, which commence operation immediately along with the associated regulation 54 transitional provision of the Building Regulations. This allows local governments to re-authorise contractors while current authorisations continue for a period of six months until the bulk of the Amendment Regulations commence operation.
- ▶ Employees of individual local governments continue to be authorised under section 96 of the Building Act and all current authorisations continue.

January 2024 v2

**Boundary barriers – alternative compliance option**

- ▶ Amended regulation 15B of the Building Regulations modifies the technical requirements of clause 2.2.4 of AS 1926.1-2012, providing boundary barriers an alternative compliance option that utilises the non-pool side of the boundary (for example, compliance can now be achieved using either the pool side or the non-pool side options).
- ▶ New sub-regulation 15B(a) of the Building Regulations has the effect of permitting the use of the non-pool side of a boundary barrier where it is at least 1200mm in height, complies with NCZ 1, 2, 3, (and where relevant NCZ 4), and does not have any steps, retaining walls, objects or level changes within 500mm of the boundary barrier that would otherwise reduce the 1200mm minimum barrier height.
- ▶ The use of this option does not impose any obligations on neighbouring properties to preserve the barrier function of the boundary fence. The pool owner remains solely responsible for the ongoing compliance of their safety barrier in accordance with their obligations under regulation 50 of the Building Regulations; if at any time the non-pool side becomes non-compliant the onus is on the pool owner to demonstrate compliance on the pool-side.
- ▶ This option is expected to alleviate known difficulties in complying with the boundary barrier technical requirements by providing an alternative pathway which may assist where ground levels or other structures on the pool side of the boundary fence make it problematic to achieve compliance.
- ▶ Caution needs to be exercised when considering the use of the new non-pool side boundary barrier option between two adjoining private properties. Compliance on the non-pool side relies on the adjoining property side of the boundary barrier, which is not typically within the control of the owner of the swimming or spa pool, and as such may be difficult to achieve and maintain.



The use of the non-pool side of the boundary barrier is better suited where it abuts a verge, park, public land, or where the pool is on the high side of a significant retaining wall, or similar circumstances, where the owner has more control and/or where compliance can be more easily maintained.

**Modified prescribed building standards**

- ▶ Prescribed building standards are modified to resolve inconsistencies in the operation of the applicable building standards that apply on completion of building work and the specified building standards that apply thereafter to existing swimming pools and their safety barrier inspections.
- ▶ The technical requirements are aligned across regulations 31C, 31E, 31G, 31H and 50A of the Building Regulations to permit compliance with the safety barrier performance requirement (and associated deemed-to-satisfy provisions) in any edition of the Building Code of Australia (BCA) in effect on or after the time of application for a building permit or commencement of construction of the associated swimming pool.
- ▶ The amended prescribed building standards provide the required flexibility for when future editions of the BCA are adopted that contain updated technical requirements applicable to safety barriers.
- ▶ A drafting note is included to regulations 31C and 50A of the Building Regulations to highlight the building standards that are modified by regulation 15B of the Building Regulations.

**Specified building standards – use of buildings within or as part of a pool barrier**

- ▶ Modified requirements in sub-regulation 50A(1) clarify access restriction requirements for buildings located within or as part of a swimming pool barrier, removing uncertainty by applying the requirements uniformly to all swimming pools regardless of age; previous sub-regulations 50(2) and (3) of the Building Regulations applied specifically to pre-May 2016 pools only.
- ▶ Buildings (other than Class 10 buildings) that are located within, or form part of, a pool barrier must have restricted access from that building to within the pool area.
- ▶ A note included to regulation 50A of the Building Regulations clarifies that any building that forms part of a barrier must comply with the technical requirements, so that access is restricted through that building to within the pool area.

**Clarification on owner and builder responsibilities for safety barriers**

- ▶ The regulation 50 of the Building Regulations which prescribes an ongoing requirement for owners to provide a safety barrier to private swimming pools containing more than 300mm of water is amended to clarify that it applies only to completed swimming pools.
- ▶ Amendments clarify and put beyond doubt that it does not apply to pools that are under construction, regardless of the level of water, while the site is under the control of a builder and within the jurisdiction of work health and safety laws.
- ▶ Specifically, regulation 50 does not apply to a private swimming pool construction site that the *Work Health and Safety Act 2020* and Work Health and Safety (General) Regulations 2022 require the builder to secure from unauthorised access.
- ▶ Concerns about the security and safety of a swimming pool construction site should be referred to the builder and, where the circumstance warrants, to WorkSafe. Failure to adequately secure a swimming pool construction site may result in enforcement action from WorkSafe and/or local governments (for example through building orders).

**Modified references in disability door concession**

- ▶ References have been updated in regulation 51 of the Building Regulations in relation to door concession provisions for persons with a disability that causes difficulty in operating a pool gate.
- ▶ Previously the provisions referred to a 'certificate' confirming a person's 'disability'. National Disability Services (NDS) now provides written confirmation of its view that a person's disability or medical condition impacts on their ability to comply with the technical requirements for a pool barrier gate.
- ▶ Amendments are made to remove the reference to the superseded 'certificate' and replace this with more general wording, and to include the wider descriptor of a person's medical condition.
- ▶ This is an administrative amendment with minimal impact. Generally, any alternatives to the prescriptive requirements are best dealt with through the performance solution framework.

**Modified building permit exemptions**

- ▶ In the Building Regulations Schedule 4 'Building work that does not require a Building Permit' Clause 2 Table is amended by removing the exception for fences forming part of a pool barrier and inserting a definition of 'fence' that specifically includes fences forming part of a pool barrier.
- ▶ Subject to listed exceptions, this removes the building permit requirement for construction, assembly or placement of a fence forming part of a safety barrier to a swimming pool, aligning requirements for all types of fencing.



- ▶ Fences that form part of a safety barrier to a private swimming pool only require a building permit if they:
  - a) also act as a fall protection barrier (also known as a balustrade), where people could fall 1m or more from a floor or roof or through an opening (other than through an openable window) in the external wall of a building, or due to a sudden change of level within or associated with a building; or
  - b) are not constructed in accordance with a relevant local law; or
  - c) are constructed of masonry and over 0.75 m in height\*; or
  - d) are constructed of a material other than masonry and over 1.8 m in height\*; or
  - e) are located in Wind Region C or D (as detailed in the AS/NZS 1170.2, as referenced in the edition of the BCA in effect at the time)\*.

\* unless constructed in accordance with a relevant Local Government local law.

Some examples below:

- A pool fence that also acts as a BCA required fall protection barrier (balustrade) will always require a building permit.
- A pool fence that complies with a relevant local law will not require a building permit.
- A pool fence that does not comply with a relevant local law will require a building permit.
- A 1.2m glass pool fence that is not subject to a relevant local law and is located in wind region A (such as Perth) will not require a building permit.
- A 1.2m glass pool fence that is not subject to a relevant local law and is located in wind region D (such as Exmouth) will require a building permit.
- A 1.8m (or less) steel pool fence that is not subject to a relevant local law and is located in wind region A (such as Perth) will not require a building permit.
- A 1.8m (or less) steel pool fence that is not subject to a relevant local law and is located in wind region D (such as Exmouth) will require a building permit.
- A steel pool fence that is greater than 1.8m that is not subject to a relevant local law and is located in any wind region will require a building permit.
- A 1.2m masonry wall (pool fence) that is not subject to a relevant local law and is located in any wind region will require a building permit.

For information on local laws please contact your relevant local government. A register of local laws is available from the [Department of Local Government, Sport and Cultural Industries](#).

#### **Initial inspection of safety barrier to new swimming pools**

- ▶ To support the Building Permit modifications above, local governments are required to conduct an initial inspection of barriers installed to new swimming pools and/or those swimming pools that have never had a safety barrier inspection.
- ▶ New sub-regulation 53(2)(a) of the Building Regulations requires an initial inspection within 30 calendar days of the local government becoming aware of a new swimming pool or one that has never had a safety barrier inspection. This could be following receipt of a Notice of Completion for a swimming pool (or barrier, where applicable), notification by the owner, or by some other means.
- ▶ On commencement of the Amendment Regulations, the requirement to conduct an initial inspection will include recently installed pools that have not yet been inspected by the local government as part of the periodic (four-yearly) inspection program.

- ▶ Sub-regulation 53A(2) of the Building Regulations provides a new fee for service for an initial inspection, charged up to a maximum of \$312 inclusive of any required re-inspections, limited to not exceeding the cost to local government of carrying out an initial inspection. This charge can be invoiced to the owner or added to the rates notice as per the annual charge.
- ▶ Previous requirements for a builder to inspect and submit an inspection certificate on completion of the safety barrier no longer apply and have been removed.
- ▶ Safety barrier compliance documentation may be requested by the local government pool inspector to assist in determining compliance at the initial inspection, such as compliance reports required by the Australian Standard (AS 1926.1) and certificates verifying appropriate safety glass pertaining to glass fence panels.

**Reinspection of non-compliant safety barriers**

- ▶ A new sub-regulation 53(2)(c) in the Building Regulations prescribes a requirement to reinspect non-compliant safety barriers.
- ▶ Where a safety barrier does not comply, a reinspection is to be arranged within a maximum period of 60 calendar days. The local government must continue to reinspect the safety barrier until compliant.
- ▶ The 60-day timeframe is a maximum, and it is expected that local governments will continue to reinspect at intervals determined by their risk assessment of the circumstances of the non-compliance and in accordance with their enforcement strategy.
- ▶ The cost of reinspecting is to be factored into the local government's inspection charging model and is not an additional separate charge to pool owners.

**Charges imposed for ongoing safety barrier inspections**

- ▶ The periodic (four-yearly) inspection annual charge has been amended and relocated to sub-regulation 53A(3) of the Building Regulations.
- ▶ The maximum annual charge has increased from \$58.45 to \$78 and continues to be limited to not exceeding the estimated average cost to the local government of carrying out periodic inspections in that year.
- ▶ The increased charge reflects the inclusion of any related re-inspections required where a non-compliant barrier is detected.
- ▶ Local governments continue to apply a single annual charge to owners of properties with a private swimming pool that is subject to the periodic inspection program and requirements of Part 8 Division 2 of the Building Regulations. The charge continues to be applied to each owner each financial year, so long as inspections were conducted in that year.
- ▶ Sub-regulation 53A(3)(c) of the Building Regulations clarifies that the charge is payable by each pool owner regardless of whether an inspection was carried out on that property in that year. This reflects the fact that annual charging relates to the cost of the entire periodic inspection program in that year and is charged to all pool owners.

**Local government reporting to the Building Commissioner**

- ▶ New regulation 53B of the Building Regulations introduces a mandatory reporting obligation on local governments, formalising the current voluntary arrangement of the past six years.
- ▶ Local governments are required to report annually to the Building Commissioner to demonstrate progress with the four-yearly safety barrier inspection program for the preceding financial year, with the data required to be provided before 1 August each year.

- ▶ Data to be reported is unchanged from the voluntary arrangement, being:
  - The total number of swimming pools located in the district that are subject to the private swimming pool safety barrier requirements of Part 8 Division 2 of the Building Regulations;
  - The number of swimming pools referred to above that were inspected during the preceding financial year; and
  - The number of swimming pools that were not inspected within four years of a previous inspection at the end of the reporting period.

**Disclaimer** – The information contained in this fact sheet is provided as general information and a guide only. It should not be relied upon as legal advice or as an accurate statement of the relevant legislation provisions. If you are uncertain as to your legal obligations, you should obtain independent legal advice.

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National Relay Service: 13 36 77

Translating and Interpreting Service (TIS): 13 14 50

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# Integrity Snapshot Tool

for WA Public Authorities

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## Integrity Snapshot Tool

The snapshot tool supports the [Integrity Strategy for WA Public Authorities 2020-23](#). It gives public authorities a clear view of what they have in place to support integrity, and can help them identify areas for development or more focus that should feature in their planning. The snapshot tool is not meant to be an exhaustive list of things to consider and should be used by public authorities in a manner that best suits their contexts. It is not intended to replace more detailed or specific risk management activities.

The tool can:

- help public authorities evaluate their approaches to promoting integrity and reducing misconduct risks
- identify any gaps in the current approaches to integrity by public authorities that could be actioned.

## How to use the snapshot tool

As this is a self-assessment tool, public authorities can benefit by using it to review the status of their approach to integrity and make decisions about where further or additional work is needed.

Public authorities are encouraged to update their assessments as they progress with actioning items. In this way they capture their assessments on an ongoing basis. It is acknowledged that each public authority has a different risk profile and operating context, and is at varying points of progress in managing integrity risks.

Assessment guide	
Activity	Description
In place	Suggested activity has been addressed or is subject to review.
In progress	Steps are in place to address suggested activity.
Not in place	Steps may be required to address suggested activity.

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## 01 Plan and act to improve integrity

Effective governance systems and frameworks are established.

	In place	In progress	Not in place	Proposed actions and comments
<p><b>Assess if your authority:</b></p> <p>has developed and implemented a Code of Conduct that sets out its standards of conduct and integrity, and incorporates code requirements into policies and procedures to reinforce conduct expectations</p> <p><i>For public sector agencies, the Code of Conduct should reflect Commissioner's Instruction No. 7: Code of Ethics, and comply with Commissioner's Instruction No.8: Codes of Conduct and Integrity Training.</i></p>	<p>X</p> <p>X</p>	<input type="checkbox"/>	<input type="checkbox"/>	<p>2023: Code of Conduct for Elected Members, Committee Members and Candidates was reviewed in Jan 23 and is line with model rules.</p> <p>Code of Conduct for Employees includes model rules and additional provisions to expand on the model rules.</p> <p>2024: The Code of Conduct for Elected Members, Committee Members and Candidates as reviewed in early 2024 and re-endorsed by Council in March 2024 without any amendments. The Code of Conduct for employees has not been revised since it was endorsed by the CEO in 2023.</p>
<p>has identified its integrity risks considering its work and operating context, and records those risks (e.g. in a risk register, fraud and corruption control plan)</p>	<input type="checkbox"/>	<p>X</p> <p>X</p>	<input type="checkbox"/>	<p>2023: Work is underway to improve review process for the City's risk register, including quarterly review. Work is required to develop a fraud and corruption control plan.</p> <p>2024: A new suite of risk management documentation has been developed and will be adopted in mid 2024. In addition, the risk register has been revised in its entirety and better identifies integrity related risks to the City. The City</p>

	In place	In progress	Not in place	Proposed actions and comments
				does not presently have a Fraud and Corruption Control Plan.
enacts controls to address identified risks	<input type="checkbox"/>	X X	<input type="checkbox"/>	<p>2023: Controls are identified and documented during the quarterly review of the risk register. Further work is required to embed knowledge and practice around controls within the organisation.</p> <p>2024: As set out in the comment above, the new risk management documentation and risk register, including risk management software Pulse will allow the City and all officers to better identify and manage the enactment of controls.</p>
identifies and links policies that relate to risks to ensure they have consistent principles and objectives, and are clear and easy to follow (e.g. fraud and corruption, use of public resources, record keeping and use of information, conflicts of interest, gifts and benefits)	<input type="checkbox"/>	X X	<input type="checkbox"/>	<p>2023: Existing policies are currently under review and new policies currently under development. A particular focus has been ensuring integrity-related documentation is easy to understand but more work is needed with risk-related content.</p> <p>2024: Work is ongoing in relation to the City's relevant policies and other documentation.</p>
has an organisation structure that provides clear lines of accountability and responsibility for integrity and misconduct functions (including the role of leaders and managers)	X	X	<input type="checkbox"/>	<p>2023: Recently developed Employee Handbook for a Respectful Workplace and Elected Member Handbook for a Respectful Workplace provide some clarity. An Integrity Framework document is also under development which will be used for this purpose.</p> <p>2024: The documents referred to in the 2023 comment above have been</p>



	In place	In progress	Not in place	Proposed actions and comments
				endorsed and rolled out within the organisation.
has documented delegation schedules in place that align to organisation structure and legislative obligations	X X	<input type="checkbox"/>	<input type="checkbox"/>	2024: This documentation is in place and reviewed annually.
reviews delegation schedules regularly to ensure they remain current and operate with appropriate levels of authority	X X	<input type="checkbox"/>	<input type="checkbox"/>	2023: Delegation registers are reviewed annually with the next review due in July 2023. 2024: Delegation registers were reviewed over October – December 2023 and are next due for review in late 2024.

## 01 Plan and act to improve integrity (continued)

	In place	In progress	Not in place	Proposed actions and comments
<b>Assess if your authority:</b>				2023: The Executive Leadership Team and Audit and Risk Committee undertake regular review.
has a position, team or committee with documented responsibility to consider findings and recommendations from integrity audits, assessments, reviews and investigations	X	<input type="checkbox"/>	X	2024: In addition to the work undertaken by the ARC and ELT, the Executive Advisory Group review this information and report to the CEO and ELT. Responsibility is documented in the EAG's terms of reference as well as the Integrity Framework.
assigns accountability and responsibility for monitoring and overseeing risks and controls (e.g. in authority's structure, job descriptions)	X	X	<input type="checkbox"/>	2023: EMGRS, EMF and EMPC have responsibility implied within their roles however the levels of accountability

	In place	In progress	Not in place	Proposed actions and comments
				<p><i>and responsibility could be more clearly set out.</i></p> <p>2024: The Executive Advisory Group review this information and report to the CEO and ELT. Responsibility is documented in the EAG's terms of reference as well as the Integrity Framework. The responsibility is collective rather than being built into individual PDs.</p>
has an internal audit committee with an independent chair	X	X	<input type="checkbox"/>	<p>2024: The City has an audit committee with an independent member, but not an independent chair at present.</p>
uses tools and templates provided by the Commission or other sources to support its approach to managing integrity risks	<input type="checkbox"/>	X X	<input type="checkbox"/>	<p>2023: The City is now using these resources to assist in the development of improved systems and documentation.</p> <p>2024: Work is ongoing.</p>
has a process to review regularly its integrity risk profile to ensure it is responsive to emerging risks and recommendations made by integrity bodies (e.g. policy and practice review, process improvements)	X X	<input type="checkbox"/>	<input type="checkbox"/>	<p>2023: The City is undertaking quarterly reviews of risk and reporting to ARC of any changes recommended to the risk register. Changes are also identified in an ad hoc manner to respond to emerging risks – eg. psychological safety risks, IT risks, global market conditions. In addition, work is being done to better embed risk-conscious work practices within the organisation so that all officers are identifying and responding to risks and considering control mechanisms.</p> <p>2024: As per comment above from 2023. The new risk management documentation and strategy will increase the level of review that is undertaken across the City.</p>

	In place	In progress	Not in place	Proposed actions and comments
evaluates and refines any processes, systems and controls that are in place or may be introduced to inform its detection and prevention of irregularities and corrupt practice (e.g. detection software, data analytics)	<input type="checkbox"/>	X X	<input type="checkbox"/>	2023: IT has some systems and processes in place eg, detecting improper access to records. However, a broader organisational process needs to be developed. 2024: Work is ongoing in relation to this. The introduction of the new risk management plan will assist the organisation doing better in this area.
conducts regular assessments of business areas and functions that are, or may be, vulnerable to integrity risks (e.g. procurement and contracting; use of and access to confidential information; recruitment)	<input type="checkbox"/>	X	X	2023: While a regularised assessment process is not in place, areas such as these have been identified as requiring focus and improvement. 2024: There is not a defined process in place however business units undertake reviews on an ongoing basis. The introduction of the new risk management plan will assist the organisation doing better in this area.
connects and collaborates with other authorities to seek or share expertise and advice on integrity matters (e.g. conducting investigations, policy development and process improvements)	<input type="checkbox"/>	X	X	2023: EMGRS and EMPC are currently looking at opportunities to expand networks for their areas of responsibility. 2024: Both EMGRS and EMPC are involved in LGPro committees in their respective areas, which allows for sharing of information.

## 02 Model and embody a culture of integrity

A culture of integrity exists, and is reinforced and communicated by leaders.

	In place	In progress	Not in place	Proposed actions and comments
<b>Assess if your authority:</b>				
has values that include integrity integrated into all aspects of its business (e.g. in policies, processes and systems)	<input type="checkbox"/>	<b>X</b> <b>X</b>	<input type="checkbox"/>	<p>2023: Integrity principles are implied, or integrity concepts and language is used, but could be developed as a more defined component of policies, processes and systems.</p> <p>2024: As per comment above from 2023.</p>
promotes integrity in and outside the authority (e.g. website, publications, staff newsletters, division meetings, annual reports and everyday practices)	<input type="checkbox"/>	<b>X</b> <b>X</b>	<input type="checkbox"/>	<p>2023: Integrity principles are implied, or integrity concepts and language is used, but could be developed as a more defined component of policies, processes and systems.</p> <p>2024: The governance team are currently developing a suite of documentation that will be included in an "induction pack" as well as for publication from time to time on newsletter, intranet and notice boards. Integrity is a standing meeting item in ELT meetings.</p>
has leaders who role model integrity and demonstrate zero tolerance for breaches of ethical codes and misconduct	<input type="checkbox"/>	<b>X</b> <b>X</b>	<input type="checkbox"/>	<p>2023: ELT leadership is being developed and achieving consistency in this is an ongoing goal. The MT are also being developed in relation to achieving this.</p> <p>2024: Increased knowledge and awareness will increase leadership by ELT and other leaders.</p>

	In place	In progress	Not in place	Proposed actions and comments
				Misconduct and ethical breaches are dealt with in accordance with the City's relevant policies and procedures and are reported to PSC/CCC as required.
has a consultation mechanism to engage with and involve staff when reviewing integrity policies, procedures and information to gain shared commitment and understanding	<input type="checkbox"/>	X X	<input type="checkbox"/>	<p>2023: Consultation is currently achieved through Consultation Committee and Management Team interactions with their team members. Documents such as the Code of Conduct are also assessed to determine the best way to embed knowledge and understanding in the organisation.</p> <p>2024: Changes are underway in relation to the conduct of the City's Consultative Committee. In addition, the ELT and P &amp; C team undertake a variety of approaches to embedding corporate policies and procedures dependent on the nature of the document.</p>
has human resource policies and practices that reflect a commitment to recruiting staff who demonstrate a strong alignment to its values	<input type="checkbox"/>	X	X	<p>2023: In principle, these practices are expected however not documented and development is needed to ensure this is a recruitment focus for officers undertaking recruitment responsibilities.</p> <p>2024: An increased focus on values is evident through recruitment as well as performance review. P &amp; C are providing more education and support to recruiting officers to ensure a consistent approach is taken.</p>

	In place	In progress	Not in place	Proposed actions and comments
ensures recruitment materials include information on values and conduct expectations	<input type="checkbox"/>	X	X	<p>2023: PDs for advertising include the values however further information is not provided to candidates until induction.</p> <p>2024: Information about values is more prominent in recruitment material and included in interviews, particularly for leadership positions.</p>
conducts integrity checking, including qualification and employment history checks, as a normal part of selection and recruitment practices, particularly for positions of trust (e.g. integrity officers, finance and procurement staff)	<input type="checkbox"/>	X	X	<p>2023: In practice, this is expected however guidelines have not been developed and it is the responsibility of individual units to undertake recruitment exercises.</p> <p>2024: New employees are unable to commence until police clearances are received and are satisfactory. P &amp; C are reviewing their recruitment process which will include support for reference and background checks etc.</p>
uses staff performance processes to discuss and reinforce its values and conduct expectations	X X	<input type="checkbox"/>	<input type="checkbox"/>	<p>2023: In 2023, a focus point for appraisal review and KPI development was in relation to officers demonstrating value-focussed behaviours.</p> <p>2024: The City includes values assessment in annual performance appraisals as well as offering recognition to staff through the "Values Awards".</p>
measures staff confidence and attitudes about its integrity, including confidence in speaking up about misconduct and integrity matters (e.g. through staff perception surveys) and identifies steps to address any findings	X	X	<input type="checkbox"/>	<p>2023: Integrity-focussed measures have not been undertaken however in connection with cultural review surveys, information about staff confidence and attitudes within the workplace including in relation to</p>

	In place	In progress	Not in place	Proposed actions and comments
				<p><i>matters of management integrity has been ascertained.</i></p> <p>2024: Although not a specific measure on integrity, the City's cultural surveys ascertain the willingness of staff to speak up about issues in the organisation, and actions following such surveys include focus on ensuring avenues are available for all staff to report misconduct.</p>

### Model and embody a culture of integrity (continued)

	In place	In progress	Not in place	Proposed actions and comments
<p><b>Assess if your authority:</b></p> <p>has staff formally acknowledge that they have read its code of conduct at appointment/induction</p>	<p>X</p> <p>X</p>	<input type="checkbox"/>	<input type="checkbox"/>	<p>2023: Online induction requires confirmation of having reviewed this material prior to starting. Skytrust also has a system for employee acknowledgement which is used for roll out of new policies and procedures and annual review of existing ones.</p> <p>2024: As per comment above from 2023.</p>
<p>encourages staff to report misconduct (e.g. in policies, codes of conduct, staff communication)</p>	<input type="checkbox"/>	X	<input type="checkbox"/>	<p>2023: This content exists in current policies and codes but work is required to bring more content to the forefront rather than it existing in the background in these documents.</p> <p>2024: Documentation supports the practices of the City, and increased</p>



	In place	In progress	Not in place	Proposed actions and comments
				focus on management training supports those in leadership positions to address reports where they are made and ensure the proper processes are followed. The Governance team is developing material which will better inform staff through a variety of publication options.
makes information available about public interest disclosure processes and other reporting mechanisms to staff and stakeholders	<input type="checkbox"/>	<div>X</div> <div>X</div>	<input type="checkbox"/>	<p>2023: PID content is a current project for EMGRS. Work is required to bring this content more broadly into the workplace and public.</p> <p>2024: Work is underway and it is anticipated the City's new PID documentation will be finalised in May 2024.</p>
has reporting policies or codes in place that includes a statement that reprisal action is not tolerated against those who speak up about misconduct and integrity matters	<div>X</div> <div>X</div>	<input type="checkbox"/>	<input type="checkbox"/>	<p>2023: This is an ongoing principle in all policies set out in the new Employee Handbook for a Respectful Workplace (and reciprocal version under development for Elected Members).</p> <p>2024: As per comment above from 2024, with the Elected Member's document endorsed in 2023 and re-endorsed in March 2024.</p>

### 03 Learn and develop integrity knowledge and skills

Individual and authority integrity knowledge, skills and competence are grown.

	In place	In progress	Not in place	Proposed actions and comments
<b>Assess if your authority:</b>				
ensures integrity training programs are up to date (e.g. reflects its code, legislative and policy requirements)	<input type="checkbox"/>	X X	<input type="checkbox"/>	2023: There is some focus on induction which needs to be developed and doesn't include existing staff. LG Pro modules are to be introduced which will provide some formal and consistent information and training to all staff. 2024: As per comment above from 2023. The Governance team are currently preparing "induction pack" information for new starter and existing staff which will include information regarding integrity and misconduct.
maintains records of staff who attend induction and integrity training	<input type="checkbox"/>	X X	<input type="checkbox"/>	2023: Information is recorded by P & C. 2024: As per comment above from 2023.
follows up with staff where necessary to ensure learnings from integrity training are embedded	<input type="checkbox"/>	<input type="checkbox"/>	X X	2024: No current follow-ups occur with staff.
has a process for communicating with staff about integrity matters including updating them about changes to policies, processes and systems (e.g. through newsletters, emails, meetings)	X X	<input type="checkbox"/>	<input type="checkbox"/>	2023: Information is communicated via ELT, Management Teams, Consultative Committee, newsletters, emails and Skytrust. 2024: The governance team is developing a suite of "induction pack" information which will be provided to

	In place	In progress	Not in place	Proposed actions and comments
				new starters and existing employees, and includes content that will be published in the staff newsletter, on notice boards and on the intranet.
has a formal induction process in place for all new staff and contractors that includes a clear focus on integrity	X	X	<input type="checkbox"/>	2023: Induction includes integrity including compliance and values but could be expanded with a more defined focus on integrity to include but expand on these topics. Contractors are not included in this induction process. 2024: Misconduct is addressed in staff inductions for new starters and the Governance team is developing and "induction pack" and other publications for staff.
delivers Accountable and Ethical Decision Making (AEDM) training (or equivalent) and refresher training to staff that:				
• is aligned to its Code of Conduct	<input type="checkbox"/>	<input type="checkbox"/>	X	2024: This training is not offered by the City currently and is not a current priority.
• is customised to its context and business, and covers its specific integrity risks	<input type="checkbox"/>	<input type="checkbox"/>	X	
• is up to date and reflects changes to systems and processes	<input type="checkbox"/>	<input type="checkbox"/>	X	
• includes information on its integrity framework, policies, processes and systems	<input type="checkbox"/>	<input type="checkbox"/>	X	
• includes information on how to recognise, respond to and report misconduct	<input type="checkbox"/>	<input type="checkbox"/>	X	
• records attendance and completion rates which can be provided to the Commission and other integrity bodies as required	<input type="checkbox"/>	<input type="checkbox"/>	X	

### 03 Learn and develop integrity knowledge and skills (continued)

	In place	In progress	Not in place	Proposed actions and comments
<b>Assess if your authority:</b>  provides specific integrity training to staff working in high risk roles (e.g. finance, procurement, integrity) in relation to fraud and corruption, accountability requirements and reporting suspected misconduct	<input type="checkbox"/>	X	<input type="checkbox"/>	2023: There is nothing in place in a formal sense - staff attend training and professional development sessions to highlight areas of concern.  2024: Reporting and supervisory lines allow for issues to be communicated to managers and ELT, and are also raised with the EMGRS. This is the current process which is applied in practice, rather than other staff addressing integrity issues directly themselves.
evaluates staff awareness of its integrity requirements (e.g. through staff perception surveys) and acts on any knowledge deficits	<input type="checkbox"/>	<input type="checkbox"/>	X	2023: Some work is done in relation to values as part of cultural action.  2024: surveys are undertaken however this is not a priority focus area so has not been the subject of direct questioning.
encourages, supports and provides a mechanism for staff to seek advice on integrity matters when they are unsure	X	X	<input type="checkbox"/>	2023: EMGRS has expanded communications through induction, consultation committee and management team meetings to ensure staff are aware Governance Team should be approached.  2024: As per comment above from 2023. EMGRS is approached and advised by managers and ELT members and P & C also provide a reporting line for staff.
makes staff aware of the process of identifying integrity risks and contributing to the risk register	<input type="checkbox"/>	X	X	2023: Work needs to be done to better embed risk related practices throughout the organisation.

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	In place	In progress	Not in place	Proposed actions and comments
				2024: The new risk management documentation and strategy/action plan will increase all staff's knowledge, thinking and documentation of risks.
ensures staff who respond to and investigate integrity matters are suitably skilled (e.g. have Certificate IV in Government Investigations or higher qualification and/or relevant experience)	<input type="checkbox"/>	<input type="checkbox"/>	X X	2024: This training has not been identified as a priority given the low number of incidents currently experienced by the City and a preference for external consultants to be used for investigating serious or senior management related complaints.
exercises due diligence when engaging contractors to deal with integrity matters to ensure they have the necessary qualifications, skills and/or experience (e.g. through reference and qualification checks)	X X	<input type="checkbox"/>	<input type="checkbox"/>	2023: There is no recent experience of this being required however due diligence is an established part of this procurement process and engagement of such a contractor would be undertaken by the CEO. 2024: Contractors with due skill and experience are engaged for investigations. This is a given as part of procurement requirements rather than a documented specific requirement.
seeks opportunities for further learning about integrity matters by identifying key staff to attend events and forums provided by the Commission and other bodies	X X	<input type="checkbox"/>	<input type="checkbox"/>	2023: Where information becomes available it is circulated to relevant members of the organisation. 2024: The EMGRS attends relevant training opportunities where possible.
establishes networks with other integrity practitioners	<input type="checkbox"/>	X X	<input type="checkbox"/>	2023: EMGRS is looking at opportunities to expand the City's governance network including through LGPro. 2024: The EMGRS is a member of LGPro's Governance Committee. In

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	In place	In progress	Not in place	Proposed actions and comments
				2024 the EMGRS intends to visit some other governance units in LGAs to exchange ideas and information.

## 04 Be accountable for integrity

Prevention, detection and response to integrity matters are everyone's personal and professional responsibilities.

	In place	In progress	Not in place	Proposed actions and comments
<b>Assess if your authority:</b>				
has a clear and documented process to assess potential misconduct that guides decision making about when to notify the Public Sector Commission and Corruption and Crime Commission of minor misconduct and serious misconduct (respectively), using their online reporting tools	X	X	<input type="checkbox"/>	<p>2023: There is a broad policy that says that the City will comply with external reporting mechanisms but not a process that will be followed in that regard.</p> <p>2024: The City's Employee Handbook for a Respectful Workplace sets out requirements for reporting minor and serious misconduct, as well as criminal matters. This will be reviewed when the new PID documentation is finalised to ensure consistency and sufficient detail.</p>
articulates the roles and responsibilities of the leadership team in overseeing integrity	X	X	<input type="checkbox"/>	<p>2023: There is an expectation of ELT and management team however this has not been specifically articulated.</p> <p>2024: Various responsibilities have been articulated in the Integrity Framework, as well as in the Executive Advisory Group's Terms of Reference.</p>

	In place	In progress	Not in place	Proposed actions and comments
has a documented and active process to review and learn from internal and external reports, including focusing on individual conduct as well as system, cultural and capability weaknesses that may have provided the opportunity for misconduct to occur	<input type="checkbox"/>	X	X	<p>2023: ELT has a process of reviewing such matters through its weekly meeting, however there is not documented process and it is ad hoc due to the infrequency of such occurrences.</p> <p>2024: The Integrity Framework includes some documented requirements however these are not full embedded practices currently.</p>
<p>monitors, reviews and addresses its approach to changing and emerging risks (e.g. due to restructure, introduction of technology and legislative change) and ensures:</p> <ul style="list-style-type: none"> <li>a new integrity risk assessment is completed</li> <li>its risk register is updated</li> <li>internal policies, processes and systems are updated to reflect the new operating context</li> </ul>	<p>X</p> <p>X</p>	<input type="checkbox"/>	<input type="checkbox"/>	<p>2023: Risk and policy review and update are under ongoing review via EMGRS and ELT.</p> <p>2024: As per previous comments, changes to the City's risk management documentation and practices will improve this on a continual basis.</p>
collected data is analysed and reported to the leadership team (e.g. reports of integrity breaches, complaints, grievances, staff survey results, training records, conflicts of interest, gifts and benefits register)	X	X	<input type="checkbox"/>	<p>2023: Information is brought to ELT by EMGRS or EMPC on an ad hoc basis.</p> <p>2024: Including "Integrity" as a standing item on the ELT meeting agenda and promoting the sharing of information means that all ELT members will report relevant incidents to ELT on a regular basis.</p>
has integrity as a standing agenda item for its leadership team to provide a forum to interrogate data, and identify and respond to emerging trends (e.g. data about breaches of Code of Conduct or policy, allegations of misconduct, complaints received, and recommendations from self-assessments and audits)	X	<input type="checkbox"/>	X	<p>2024: Including "Integrity" as a standing item on the ELT meeting agenda and promoting the sharing of information means that all ELT members will report relevant incidents to ELT on a regular basis.</p>





City of  
Kalgoorlie  
Boulder

# Integrity Framework



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## 1. INTRODUCTION

The Public Sector Commissioner, Sharyn O'Neill, explains integrity as follows:

*"Operating with integrity means using our powers responsibly for the purpose and in the manner for which they were intended. It means acting with honesty and transparency, making reasoned decisions without bias by following fair and objective processes. It also means preventing and addressing improper conduct, disclosing facts without hiding or distorting them, and not allowing decisions or actions to be influenced by personal or private interests."*

The City of Kalgoorlie-Boulder (the "City") understands that operating with the highest level of integrity is integral to achieving good governance practices in all areas of our responsibility and operations. It is also critical to building and maintaining the trust of the Kalgoorlie-Boulder community.

This Integrity Framework has been developed to coordinate the City's policies, procedures and systems, as well outlining the roles and responsibilities of its various persons and bodies that provide integrity related functions.

In order to implement this framework, the City will ensure that all elected members and employees are aware of the content of this document and take seriously their responsibility for the safeguarding of the City's integrity of the City. This includes:

- Acting with honesty and transparency;
- Exercising decision-making powers in the best interests of the Kalgoorlie-Boulder community, without conflict of interest or undue influence;
- Understanding and complying with their relevant Code of Conduct;
- Preventing, reporting and managing occurrences of improper conduct in accordance with the Code of Conduct and external reporting mechanisms;
- Modeling the City's values and principles of integrity every day; and
- Making suggestions on how the City can improve its approach to integrity.

## 2. WHAT ARE THE CITY'S KEY INTEGRITY ACTIONS?

The City has a number of key actions which are developed and embedded in the organisation to maintain the integrity of the organisation. These actions include:

- Setting and embedding clear expectations for all officers;
- Complying with legislation and regulations;
- Risk analysis and planning for integrity;
- Determining, managing and implementing internal controls;
- Values and standards;
- Organisational culture, leadership and management attitude;
- Integrity education and capacity;
- Response to integrity breaches;
- Self-assessment, review and oversight.

This Integrity Framework is separated under headings reflecting these above actions to provide an outline of each.

### 3. ROLES AND RESPONSIBILITIES

The following table sets out a non-exhaustive list of integrity related responsibilities for the various individuals and groups within the City.

Position/group	Examples of roles and responsibilities under the framework
Council	<ul style="list-style-type: none"> <li>• Carries out functions in accordance with the Local Government Act 1955 and supporting regulations, and other relevant legislation</li> <li>• Council members act in accordance with the Elected Member, Committee Member and Candidate Code of Conduct</li> <li>• Adopt and review this Integrity Framework and Governance Framework</li> <li>• Adopt and review Council policies which relate to integrity matters</li> <li>• Sets and endorses delegation of its authority to the CEO</li> <li>• Endorses the City's annual Compliance Audit Return</li> <li>• Endorses the Terms of Reference for Council committees including the Audit and Risk Committee and the Governance and Policy Committee</li> <li>• Designates a senior employee to be the complaints officer on behalf of the City</li> <li>• Receive reports from the Audit and Risk Committee relating to integrity matters including risks, controls, audits and other integrity controls</li> </ul>
CEO	<ul style="list-style-type: none"> <li>• Carries out functions in accordance with the Local Government Act 1995 and supporting regulations, and other relevant legislation</li> <li>• Accountable for integrity overall and drive a culture of integrity through the active demonstration of City values and communication of meeting integrity standards</li> <li>• Promotes effective risk management and governance across the organisation</li> <li>• Provides leadership in the prevention, detection and response to misconduct</li> <li>• Makes mandatory notifications to the Public Sector Commission and Corruption and Crime Commission</li> <li>• Ensures City's compliance with the Public Interest Disclosure Act 2003</li> <li>• Provides oversight of the Integrity Framework and Governance Framework</li> </ul>



	<ul style="list-style-type: none"> <li>• Provide report and advice to the Audit and Risk Committee, Governance Committee and Council in respect of integrity matters</li> <li>• Responsible for the development, implementation and enforcement of integrity policies for the City</li> <li>• Responsible for compliance mechanisms including gift declarations, primary and annual returns and conflicts of interest</li> </ul>
Audit and Risk Committee	<ul style="list-style-type: none"> <li>• Acts in accordance with its Terms of Reference, the Local Government Act 1995 and supporting regulations</li> <li>• Committee members act in accordance with the Elected Member, Committee Member and Candidate Code of Conduct</li> <li>• Receives reports on strategic integrity matters</li> <li>• Monitors effectiveness of the City's Risk Management Framework and Risk Management Policy</li> <li>• Monitors risk register and effectiveness of controls</li> <li>• Assessed adequacy of the internal audit plan and three year audit plan</li> <li>• Considers reports by the Office of the Auditor General including the annual external audit</li> <li>• Reports to Council on risks, audit activities and integrity control</li> </ul>
Governance and Policy Committee	<ul style="list-style-type: none"> <li>• Acts in accordance with its Terms of Reference, the Local Government Act 1995 and supporting regulations</li> <li>• Committee members act in accordance with the Elected Member, Committee Member and Candidate Code of Conduct</li> <li>• Responsible for the review of integrity policies for the City and recommendations to Council in relation to the same</li> <li>• Responsible for the review of governance strategies including transparency and accountability of City activities to the community</li> </ul>
Executive Leadership Team, Management Team	<ul style="list-style-type: none"> <li>• Carries out functions in accordance with the Local Government Act 1995 and supporting regulations, and other relevant legislation</li> <li>• Drive a culture of integrity through the active demonstration of City values and communication of meeting integrity standards</li> <li>• Promotes effective risk management and governance across the organisation</li> <li>• Provides leadership in the prevention, detection and response to misconduct</li> </ul>

	<ul style="list-style-type: none"> <li>• Ensure internal controls, policies and procedures are operationalised</li> <li>• Manage, respond to and report integrity breaches or issues as they arise</li> <li>• Review relevant policies, procedures and management guidelines</li> <li>• Consider operational integrity risks</li> <li>• Participate in the City's decision making processes in an impartial and unbiased manner</li> <li>• Manage integrity risks and controls in risk register</li> <li>• Provide advice and support to staff on integrity matters</li> <li>• Manage integrity risks of conflict of interests in business units</li> </ul>
Governance business unit	<ul style="list-style-type: none"> <li>• Maintains delegated authority registers</li> <li>• Maintains and publishes on the City's website registers as required by the Local Government Act and supporting regulations</li> <li>• Ensures compliance with policies and procedures related to integrity and governance practices</li> <li>• Manages gift declarations, primary and annual returns and related party disclosures</li> <li>• Provides communication and training to staff on integrity and governance matters</li> <li>• Manages policy review processes</li> <li>• Manages operational and strategic risk registers and review processes relating to the same</li> <li>• Responsible for development and implementation of Governance Framework and Integrity Framework</li> </ul>
People and Culture business unit	<ul style="list-style-type: none"> <li>• Ensures recruitment and induction processes include information about integrity matters</li> <li>• Oversees organisational employee surveys</li> <li>• Manages compliance with policies, procedures and Employee Code of Conduct</li> <li>• Prepares and implements human resources mechanisms including appraisals, training, investigations, induction and training, complaints, grievances and disciplinary action</li> <li>• Ensures appropriate pre-employment screening is carried out on candidates</li> </ul>
Information Technology and Information Management business unit	<ul style="list-style-type: none"> <li>• Manages and responds to Freedom of Information requests</li> <li>• Manages record keeping and data access by employees</li> <li>• Ensures training and education of staff around IT security</li> <li>• Provides IT audit reports to Executive Leadership Team</li> </ul>

	<ul style="list-style-type: none"> <li>Identifies and responds to IT risks and develops appropriate controls</li> </ul>
City officers	<ul style="list-style-type: none"> <li>Carries out functions in accordance with the Local Government Act 1995 and supporting regulations, other relevant legislation</li> <li>Reflects the City's values and integrity standards</li> <li>Participate in the City's decision-making processes in an impartial and unbiased manner</li> <li>Demonstrate knowledge and understanding of, and comply with the Code of Conduct, policies, procedures and management guidelines</li> <li>Participate in training opportunities to increase integrity knowledge and capacity</li> <li>Manage and declare gifts and conflicts of interest</li> <li>Report breaches of Code of Conduct and actual or suspected misconduct</li> </ul>

#### 4. SETTING AND EMBEDDING CLEAR EXPECTATIONS

##### Recruitment phase

The City is committed to ensuring that during the recruitment phase, preferred candidates for employment at the City:

- Are given accurate and relevant information about governance and integrity responsibilities including in relation to legislative and regulatory requirements of their role (delegated authority, returns, gift declaration, management of conflicts of interest);
- Are appropriately screened prior to being offered a position at the City, including reference checks, data checks and obtaining a satisfactory police clearance certification.

##### Induction for employees

New employees complete an induction on (or on occasion, shortly after) their commencement which includes information about:

- Employee Code of Conduct;
- Legislative and regulatory compliance requirements including gift declaration and conflict of interest information; and
- Misconduct and serious misconduct and external reporting mechanisms.

New employees are also required to complete online local government governance modules within one month of commencement at the City.

##### Throughout employment



As set out below under the heading “Values and Standards” the City is developing a program to provide ongoing and regular communication, training and “refreshers” in relation to its expectations of staff, including in relation to the Code of Conduct and other key policies and procedures including the Employee Handbook for a Respectful Workplace.

#### **Induction for Elected Members and Committee Members**

The City is developing a detailed induction plan for incoming Councillors following each local government election cycle. This plan will include provision of a detailed manual as well as on site training sessions delivered by a variety of people.

The City will also provide induction information to incoming external Committee members.

### **5. COMPLYING WITH LEGISLATION AND REGULATIONS**

In addition to the primary legislative instrument, the Local Government Act 1995 (WA), the City and its officers must comply with a range of State and Federal legislation and regulations including:

- Public Sector Management Act 1994;
- Corruption, Crime and Misconduct Act 2003
- Financial Management Act 2006;
- State Records Act 2000
- Animal Welfare Act 2002;
- Australian Citizenship Act 2007;
- Building Act 2011 and Building Regulations 2012;
- Bush Fires Act 1954, regulations and local laws created under that Act;
- Cat Act 2011 and Regulations;
- Caravan Parks and Camping Grounds Act 1995;
- Control of Vehicles (Off-Road Areas) Act 1978 and Regulations;
- Dog Act 1976 and Regulations;
- Environmental Protection Act 1986;
- Food Act 2008;
- Freedom of Information Act 1992;
- Graffiti Vandalism Act 2016;
- Health (Miscellaneous Provisions) Act 1911, Regulations and local laws created under that Act;
- Land Administration Act 1997 and Regulations;
- Litter Act 1979 and Regulations;
- Parks and Reserves Act 1895;
- Planning and Development Act 2005 including regulations, policies, and the Town Planning Scheme;
- Public Health Act 2016;
- Rates and Charges (Rebates and Deferments) Act 1982;

- Road Traffic Act 1974; and
- Strata Titles Act 1985.

## **6. RISK ANALYSIS**

The City implements its Risk Management Policy and Risk Management Framework.

The City undertakes quarterly risk review whereby its risk register and identified controls are reviewed for continued accuracy in both identification and assessment of strategic and operational risks, and effectiveness of identified controls. In addition, City officers respond to emerging risks by identifying and recommending additional risks and/or controls.

The City reports to the Audit and Risk Committee on a quarterly basis in relation to its risk register. On an annual basis, the City presents the entire then-current strategic and operational risk register to the Audit and Risk Committee for review and recommendation for Council endorsement. On a quarterly basis, City officers report to the Audit and Risk Committee on any recommended changes to the risk register (including controls).

The Audit and Risk Committee assesses recommendations in relation to the City's risk register and provides guidance to City officers on additional risks identified by the Committee requiring consideration and assessment.

The Audit and Risk Committee makes recommendations to Council in respect of endorsement of the City's strategic and operational risk register.

## **7. DETERMINING, MANAGING AND IMPLEMENTING INTERNAL CONTROLS**

The City has a number of controls which have been developed to reduce integrity risk and ensure legislative and regulatory compliance including the strategies detailed below. In achieving compliance, the City reduces its integrity risk by increasing its transparency and accountability in respect of decision making and other powers.

### **Delegated Authority Register**

The City records all of Council's delegation of authority to the CEO, and all CEO sub-delegation of authority to employees and all related integrity controls including:

- Primary and annual return lodgment; and
- Record keeping functions.

The City also records and gazettes authorisations and appointments for relevant employees.

### **Governance Framework**

The City has developed a Governance Framework which sets out the City's decision-making powers and responsibilities, mechanisms to ensure legislative and regulatory compliance and internal audit strategies.



**Gift declarations, conflict of interest and other registers**

The City manages gift declarations, related party disclosures, conflicts of interest and other registers as required by the Local Government Act 1995 and supporting regulations.

**Policies, procedures and management guidelines**

Council adopts public policies which provide guidance for the City as to how particular matters will be dealt with. In addition, the City develops internal operational policies, as well as procedures and management guidelines to support its public and organisational policies.

**Financial management controls**

The City has a number of financial management controls which allow self-checking by the City as well as scrutiny by Council and the community. These include monthly reconciliations, grant acquittal process, external audit requirements, procurement processes, and purchasing procedure including credit card and purchase order limits.

**People and Culture controls**

The City implements a number of personnel-focused controls to ensure:

- The City employees candidates who are able to promote the integrity of the City;
- Employees are able to understand and adhere to the City's integrity and compliance requirements.

These controls include provision of integrity information during the recruitment phase, reference, qualification and background checks prior to an offer of employment, initial induction attendance, online training requirements, annual performance appraisals and ongoing training opportunities.

**Information Technology and Information Management controls**

Information Technology and Information Management business units set a number of security controls for employees to ensure the protection of data in the possession of the City. In addition, record keeping and freedom of information is managed through related policies and procedures.

**Audit controls**

Internal audits are undertaken in respect of City financial management, compliance processes, risk identification and management, and performance of the City as an organisation against its business and strategic plans, statutory requirements and best practice.

In addition, the City undertakes audits in accordance with the Local Government (Audit) Regulations, including the annual Compliance Audit Return and annual audit by the Office of the Auditor General.

**Internal supervision and work flow approvals**

The City ensures all officers have an appropriate degree of supervision relative to their role, and has developed a range of internal processes including work flow approval forms which allow for greater oversight and consistency in decision-making.

#### **Fraud and corruption detection systems**

The following sets out some of the current and under-development detection activities of the City:

- Financial management reporting;
- Financial transaction audits;
- Credit card audits;
- Review of conflicts of interest and gifts, benefits and hospitality declarations and/or registers;
- Analysis of People and Culture data (such as disciplinary actions, leave, injuries etc);
- Review vehicle management practices including audit of vehicles and log books;
- Payroll data integrity checking (such as overtime approvals, time sheets and leave audits);
- Review and audit physical security access for the City's sites;
- Regular analysis of complaints and compliments from external sources.

In the first instance, this information is reported to and considered by the City's Executive Advisory Group and Executive Leadership Team who then determine the pathway for sharing of information with Council and/or the organisation (depending on the nature of given information).

## **8. VALUES AND STANDARDS**

### **Values**

Integrity is supported when elected members and employee model the City's values in their day-to-day activities as these shape the City's culture and define expected attitudes and behaviours.

The City's values are:

- **Respect:** "We will treat our team members and our community with mutual respect and understanding. We respect all individuals and cultures and recognise the importance of diversity and inclusion in all aspects of our organisation."
- **Support:** "We will support each and every team member to work together, build relationships and deliver greater outcomes for our organisation and our community. We believe that succeeding as one organisation is as important as succeeding individually."
- **Fun:** "We will promote and value work-life balance, and create an environment that is rewarding and fulfilling. We support opportunities for building relationships



through unexpected moments of fun that inspire, engage and help us to do our best for our community.”

- **Recognise:** “We recognise and acknowledge all individuals and cultures and value their contributions to our organisation and the community that we serve. We believe in celebrating the success of our team members, organisation and community.”
- **Connect:** “We work as one organisation that communicates openly, and actively connects with our teams, community and stakeholders. We believe in engaging and motivating our people through building relationships within our teams, across our organisation and with our community.”

#### **Code of Conduct for Elected Members, Committee Members and Candidates**

The City has a Code of Conduct for Elected Members, Committee Members and Candidates which complies with the model code required by the Local Government Act 1995.

#### **Code of Conduct for Employees**

The City has a Code of Conduct for Employees which complies with the model code required by the Local Government Act 1995 but expands on those minimum requirements to set out clear examples of what behaviour and conduct is expected, and what will not be tolerated.

The Code of Conduct has recently been redeveloped by the City and is embedded through training provided at induction as well as throughout the year.

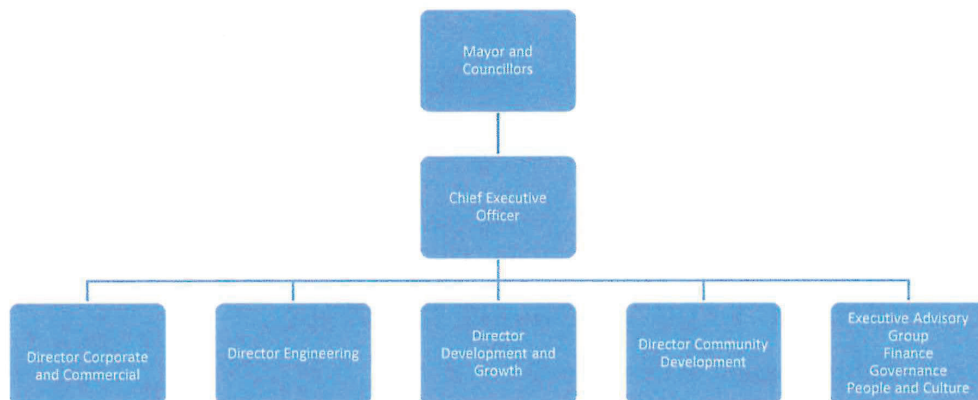
#### **Organisational policies, procedures and management guidelines**

Various policies, procedures and management guidelines have been developed to provide consistency, equity and certainty for all employees in relation to areas of their employment including integrity. These policies support the City’s integrity by providing clarity, transparency and equity for all staff including in relation to processes to be followed in relation to complaints, grievances, breach of code of conduct and misconduct.

### **9. ORGANISATIONAL CULTURE, LEADERSHIP AND MANAGEMENT ATTITUDE**

#### **Leadership structure**

The diagram below sets out the Executive Leadership Structure of the City, which report to the CEO (who in turn reports to the Council).



Effective leadership and supervision can have a significant impact on the performance and integrity of teams and help detect and prevent misconduct at the City.

Leaders must model integrity-focussed behaviours and conduct themselves with the highest level of integrity in all decisions and actions. This includes the expectation that leaders (at all levels):

- Take ownership and personal accountability;
- Own and implement executive decisions even if the leader personally did not agree with a decision reached;
- Are frank and fearless in their decisions and actions;
- Are honest in all of their dealings;
- Make decisions without favour or undue influence;
- Actively and visibly demonstrate the City's values;
- Being consistent across the organisation in decisions and actions;
- Comply with the City's policies, procedures, management guidelines and systems;
- Dealing with employees in a way that is open, consistent and fair;
- Monitoring their team's delivery of tasks, provide direction, supervision and feedback;
- Managing substandard behaviour or performance in accordance with the City's policies and procedures;
- Engage actively and provide thoughtful contribution to leadership meetings; and
- Be upfront, honest and forthcoming with information as required and not conceal facts or provide misleading information.

Matters relating to integrity should be regularly scrutinised at Executive Leadership Team meetings, Management Meetings and within business units to ensure that all

employees are aware of both positive and negative integrity issues within the organisation. Regular communication at all levels will:

- Increase the knowledge and understanding of all employees in respect of their integrity obligations;
- Develop a culture of supporting each other, identifying and preventing misconduct; and
- Foster an environment for all employees to consider integrity and provide feedback for the City's continuous improvement.

## **10. INTEGRITY EDUCATION AND CAPACITY**

### **Provision of information to employees**

The City will continue to develop its training and education of staff in respect of integrity matters through:

- Induction program for new starters;
- Internal training and "refresher" courses;
- External training opportunities;
- Annual staff appraisals;
- Mentoring opportunities;
- Networking programs;
- Induction programs;
- Newsletters and emails; and
- Posters around City buildings.

Information including documents such as the Code of Conduct, Employee Handbook for a Respectful Workplace and other policies and procedures can be found on the City's intranet, CI Anywhere or by request to the Governance team or People and Culture Team.

City employees can seek integrity advice and guidance from:

- their direct supervisor, manager or director;
- Executive Manager Governance and Risk Services;
- Executive Manager People and Culture; or
- Chief Executive Officer.

### **Elected Member training and provision of information to Elected Members**

Elected Members are required to complete a number of specified units within 12 months of being elected and the City maintains a register of all training completed.

Information is provided by the City to Elected Members during Council meetings and through the CEO's email update.

The City will run a detailed induction program following the local government election in October 2023.



## **11. TRANSPARENCY AND ACCOUNTABILITY TO THE COMMUNITY**

The City endeavours to be transparent and accountable to the Kalgoorlie-Boulder community in order to develop and maintain the trust of the public. This is achieved through a variety of strategies including;

- Public notices to advise the public of upcoming decisions or actions;
- Social media posts to provide information including about the City's services, upcoming events, reminders, public notices and general City related activities;
- Registers of information available to the public;
- Council agendas and minutes are published on line for public access;
- Freedom of Information processes allow for information to be obtained by members of the public (in accordance with relevant legislative and regulatory framework);
- Consultation and engagement with the City including through surveys, meetings and working groups; and
- Opportunity for community participation in Council meetings by attending public meetings, asking questions and presenting information.

## **12. RESPONSE TO INTEGRITY BREACHES**

The City has developed its "Employee Handbook for a Respectful Workplace" which sets out a number of policies and procedures pertaining to:

- Handling of code of conduct breach and grievance complaints;
- Handling of misconduct complaints;
- Disciplinary processes; and
- Requirements for mandatory notification to external agencies.

The City does not tolerate victimisation of any person who makes a complaint of any kind; and will make reasonable efforts to ensure there is suitable protection and support for persons who report suspected integrity breaches.

## **13. SELF-ASSESSMENT, REVIEW AND OVERSIGHT**

### **Review of Integrity Framework**

The CEO and Executive Manager Governance and Risk Services will oversee a biennial review of this Integrity Framework by leading a review by the Executive Leadership Team and the City's Consultative Committee with a view to determining what content should be removed and what should be added.

The City will continue to access available resources and reports published by authorities including the Public Sector Commission, WALGA and the Department of Local Government, Sport and Cultural Industries to meet best practices in integrity and integrity management.

### **Integrity Snapshot Tool**

The City will complete the Public Sector Commission's Integrity Snapshot Tool annually and use this resource to develop action items for improved integrity management in the organisation.

**Review by Audit and Risk Committee, Governance and Policy Committee and Council**

The CEO will make recommendations to Council committees and Council in relation to proposed amendments to this Integrity Framework document.

**Oversight**

The CEO will ensure that integrity focused discussions are a standing agenda item for:

- Executive Leadership Team meetings;
- Executive Advisory Group meetings; and
- Management Team meetings,

and are the focus of regular reports to the Audit and Risk Committee and/or Governance and Policy Committee.

The intent of including integrity matters for discussion at these meetings is to embed integrity-focused thinking throughout organisational leaders. This will facilitate conversation about detection of integrity breaches and controls to prevent it and provide opportunity to exchange information such as about incidents, complaints, new processes to be followed and resources available.



#### **14. CITY OF KALGOORLIE-BOULDER DOCUMENTS**

The following are critical integrity-focused documents referred to or related to this Integrity Framework:


- Governance Framework
- Code of Conduct for Elected Members, Committee Members and Candidates
- Code of Conduct for Employees
- Employee Handbook for a Respectful Workplace (including policies and procedures for handling of grievances, breach of code of conduct and misconduct)
- Risk Management Framework
- Risk Management Policy
- Record Keeping Policy
- Elected Member Record Keeping Policy
- CEO and staff delegated authority registers

#### **15. REFERENCES**

The following documents were used with thanks in the development of the City of Kalgoorlie-Boulder's Integrity Framework:

- Public Sector Commission Integrity Framework Template
- Public Sector Commission Integrity Snapshot Tool
- Town of Claremont Integrity Strategy
- City of Stirling Integrity Strategy
- City of Joondalup Integrity Framework

**Endorsed by the CEO:**

Signature:  \_\_\_\_\_

Date: 12/03/2024



# City of Kalgoorlie Boulder

## WHS April Report 2024

## WHS Report April 2024

**1.0 Background to the report**

The monthly Work Health and Safety report provides an overview of the safety performance within our organisation. This report includes statistics on incidents, hazards, and emerging trends. By analysing this data the City can identify areas for improvement, implement necessary safety measures, and track the effectiveness of our WHS initiatives.

**2.0 Incidents reported for April 2024****Incidents Reported for April 2024**

TOTAL INCIDENTS REPORTED 23

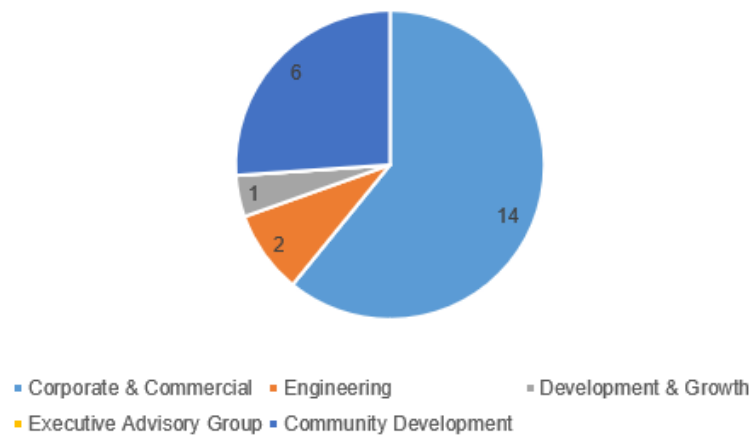
Vehicle Accidents/Damages – 1

Property Damage - 1

Public Incidents - 7

Staff Injury/Illness - 2

Creche – 12

**Business Unit Reported Accident/Incidents**

June 2024

### 3.0 Major Incidents

A major WHS incident is an unplanned event or occurrence that has the potential for injury, ill health, damage or other loss.

Most incidents reported this month relate to members of the public at the Oasis, children in both the Oasis and Administration Building creches, and children being injured at Kidsfest.

INCIDENT			DETAILS/OUTCOMES/ACTIONS	
#	Date	Location	Details	Immediate Action
1418	10/04/2024	Cnr Throssell and Piccadilly Streets	Member of the public failed to give way and drove into the side of a City tractor.	Staff member unharmed. Supervisors were on the scene and reported damage to Property. Matter closed.
1427	22/04/2024	Oasis	Member of the public split his head open on a sharp edge in the pool	First Aid Provided. Matter closed.
1416	10/04/2024	Oasis	Staff member had a weight fall onto her head	First Aid Provided.
1423	09/04/2024	Depot	Staff member slipped on gravel whilst getting out of the truck. No Injury.	Reported to Supervisor. Matter closed.
1412	02/04/2024	Boulder Town Hall	Burst water pipe.	Water Corp attended and fixed. Matter closed.
1422	14/04/2024	KidsFest	Child flipped on back resulting in back pain.	Child taken to hospital as a precaution. Matter closed.
1421	13/04/2024	KidsFest	Child hit in face with golf ball.	Treated by St Johns Ambulance. Matter closed.

### 4. Major Hazards

A WHS hazard is defined as any source of potential harm, injury, or adverse health effect on a person or persons. Hazards can arise from a variety of sources including physical, chemical, biological, ergonomic and psychosocial origins.

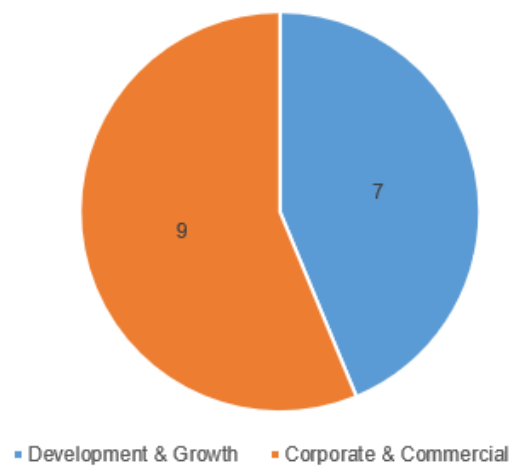
A total of 16 Hazards were reported during the month of April. The majority of these were reported from the Oasis.

HAZARD #	DATE	WORKPLACE/PUBLIC	DETAILS	OUTCOMES/ACTIONS
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## WHS Report April 2024

316	03/04/2024	GAC	Area of cabled not earthed.	Isolated and contractor rectified. Matter closed.
318	08/04/2024	Oasis	Three gates broken.	Work request issued to Property.
317	05/04/2024	Community Development	Jockey wheel on youth trailer is broken.	Work request submitted to Fleet.
322	16/04/2024	Men's Shed	No ventilation in the paint room	Requested update. Matter closed.
327	26/04/2024	Job Support Hub	Leak in ceiling.	Work request issued to Property.
329	29/04/2024	GAC	Trip hazard on bricks on forecourt	Under Arts & Culture Trust. Requested evidence of work request to Trust.

Hazards Identified in April



June 2024