Risk Management Strategy



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CONTACT US









PO Box 580 Stawell VIC 3380















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Introduction

Risk management is critical to the Northern Grampians Shire Council's ability to achieve the Strategic Objectives contained in the Council Plan. Council has limited human, financial and material resources and prudent decision making in relation to their use is critical to the achievement of the endorsed Council Plan. To this end, council staff must identify and minimise threats to the safe and effective employment of council resources. By fostering a vibrant risk management culture that encourages all staff to systematically apply the principles and procedures outlined in this strategy, the Council seeks to minimise resource waste and ensure that all council events, activities and projects are undertaken with an understanding of and minimisation of the level of risk to staff, council assets and the general public.

Risk Management Principles (AS ISO 31000:2018)

For risk management to be effective, Northern Grampians Shire Council will at all levels comply with the following principles.

Risk management:

- a) Integrated
 - Risk management is an integral part of all organisational activities.
- b) Structured and comprehensive
 - A structured and comprehensive approach to risk management contributes to consistent and comparable results.
- c) Customised
 - The risk management framework and process are customised and proportionate to the organisation's external and internal context related to its objectives.
- d) Inclusive
 - Appropriate and timely involvement of stakeholders enables their knowledge, views and perceptions to be considered. This results in improved awareness and informed risk management.
- e) Dynamic
 - Risks can emerge, change or disappear as an organisation's external and internal context changes. Risk
 management anticipates, detects, acknowledges and responds to those changes and events in an
 appropriate and timely manner.
- f) Best available information
 - The inputs to risk management are based on historical and current information, as well as on future expectations. Risk management explicitly takes into account any limitations and uncertainties associated with such information and expectations. Information should be timely, clear and available to relevant stakeholders.
- g) Human and cultural factors
 - Human behaviour and culture significantly influence all aspects of risk management at each level and stage.
- h) Continual improvement
 - Risk management is continually improved through learning and experience.

Context

This document outlines the council's strategic approach to managing business risks – both strategic and operational and ensures council and management have a common and clear view of the purpose of risk management, the activities to be pursued and the plan to build risk management capability and maturity.

It is important that this strategy be read in combination with the *Risk Management Policy* and referenced policies/procedures.

The objectives of this strategy relate to the application of the risk management approach to the range of activities that are undertaken across council. Compliance with and achievement of specific action plan activities are the responsibility of identified departments. The Corporate Services Team has a corporate role in terms of providing an advisory service to all departments, developing competencies, reviewing and reporting to the Executive Leadership Team, Audit & Risk Committee, Risk Committee, and Council as required.

Internal risks are driven primarily by process delivery and the operations of council services whilst the external environment risks are driven by the influence of the external environment on council objectives.

Risk Management Drivers

Risk management is integral to good governance and good management. In the local government context, key **legislation drivers** include:

- Local Government Act 2020
- Equal Opportunity Act 2010
- Planning and Environment Act 1987
- Public Health and Wellbeing Act 2008
- Occupational Health and Safety Act 2004
- Protected Disclosure Act 2012
- Charter of Human Rights & Responsibilities Act 2006
- Ombudsman Act 1976
- Privacy & Data Protection Act 2014
- Road Management Act 2004
- Gender Equality Act 2020
- Child Safety and Wellbeing Act 2005
- Environmental Protection Act 2017

Key internal drivers include:

- values (Responsive, Innovative, Continuous Improvement, Prompt, Respectful)
- staff and Councillor Codes of Conduct
- Audit & Risk Committee
- internal audit program
- Risk Committee
- form and extent of contractual arrangements
- information systems and information flows
- Occupational Health & Safety Committee
- frameworks (staff capability, accountability, planning, information security management, fraud control)
- standards and guidelines
- service delivery
- policies, processes, objectives and strategies

Key external drivers include:

- culture
- social
- political
- legal
- regulatory
- financial
- technological
- economic
- natural

• competitive environment

Statement of Commitment

In accordance with the *Northern Grampians Shire Council Risk Management Policy*, Council is committed to managing risk by logically and systematically identifying, analysing, evaluating, treating, monitoring and communicating all risks that directly or indirectly impact on council's ability to achieve strategic objectives outlined in the Council Plan.

This strategy demonstrates council's commitment, by detailing the risk management framework to be employed by all Councillors, staff members, contractors, committees and volunteers engaged in council business.

Council believes that good risk management is essential for the successful implementation of the Council Plan, as it:

- directly supports council's direction as outlined in the Council Plan
- indirectly supports the achievement of council's strategic objectives and direction, through:
 - O facilitating innovation, cooperation and the sharing of resources
 - O enhancing the development and delivery of Council programs
 - O supporting council's key values and ethics
 - O encouraging a closer working partnership between council and the community
 - O ensuring engagement with all stakeholders on key issues
 - O encouraging a proactive approach to problem solving

Scope

This Risk Management Strategy will be implemented by all council departments and across all council services, functions and activities, whether directly controlled by council or delivered through third party arrangements. All employees, contractors, partner organisations and volunteers engaged in the conduct of council business are to apply consistent, proactive and systematic risk management practices in the employment of council resources and the delivery of council services. Successful risk management relies on input from all stakeholders, ie ratepayers, contractors, businesses and other service providers, and ownership of identified risks by responsible staff. Council's established business practices, policies and procedures will be reviewed and monitored, to ensure that they are not in conflict with *Risk Management Standard AS ISO 31000:2018*.

Strategy Principles

The principles of the strategy are to:

- identify, evaluate and prioritise council's risk with a view to reducing, transferring or eliminating threats
- promote and support a risk management culture throughout council
- recognise that successful risk management relies on input and commitment from ALL employees and stakeholders
- allow for more effective allocation and use of resources
- provide a basis for higher standards of accountability
- protect council's corporate image as a professional, responsible and ethical organisation and an employer of choice

Risk Management Priorities and Resources

Risk Management Strategy principles shall be a consideration in all council decision making processes. In accordance with its common law 'duty of care', statutory responsibilities and council policy, Council will ensure that appropriate resources (people, funding, tools, systems and training) are allocated to:

- minimise the council's exposure to loss and litigation
- protect and enhance the council's reputation
- protect the council's financial and physical assets

maintain employee health and safety programs

Risk management will be undertaken for projects, policy development and as part of delivery of programs and services to ensure there is a comprehensive, consistent and integrated approach across the agency.

Council accepts that it does not have the resources to immediately address all of the risks it faces. The Risk Committee will review significant risks as they occur and identified through audit findings for the Executive Leadership Team (ELT) to consider during the budget and Council Plan processes. Risk priorities will then be approved by ELT and included in the council's corporate and business plans.

The annual review process is flexible: extreme and high priority risks identified at any time will be assessed and treated in accordance with the procedure described in this strategy.

Communication and Implementation

The strategy promotes communication and implementation of risk management across the organisation through:

- links to OHS, Risk and Audit & Risk Committees
- distribution of Risk Management Strategy to all staff via the council's EDRMS and Councillors via the Docs on Tap program
- inclusion of risk management responsibilities in Key Performance Indicators and Position Descriptions
- regular review of risk management performance by department heads/managers
- appraisal of risk management performance as part of the annual staff review program
- appropriate training

Communication and consultation are important considerations at each stage of the risk management process. They should involve a dialogue with all stakeholders (both internal and external) with a focus on consultation, rather than a one-way flow of information from the decision maker to the stakeholders. All stakeholders must be confident that their views have been appropriately considered and that they have been kept informed of the actions being taken and the reasons behind those actions.

This may extend to sending a report to all stakeholders, regarding the success or otherwise of risk controls put in place as a result of the risk assessment being conducted.

Performance Review and Continual Improvement

The strategy is to be reviewed annually by the Risk Committee to ensure its continued suitability and effectiveness against best practice and it is in line with the Council Plan. Following the review, the strategy is to be reported to ELT for endorsement.

Risk management responsibilities are detailed in the *Risk Management Policy* and are to be incorporated into all Council Position Descriptions. The success measures developed for all staff are to form the basis of annual performance appraisals.

An emphasis is placed on continual improvement in risk management through the setting of annual risk management performance objectives contained within the *Risk Management Policy*. The Risk Committee is responsible for the setting and reporting on the status of these objectives to the Executive Leadership Team and Audit & Risk Committee to conduct an annual review of performance.

Audit Plan

Risk management improvement opportunities are identified via the Audit & Risk Committee annual compliance audit plan through the review of associated audit reports from internal and external auditors on non-compliance and improvement opportunities to incorporate into the review of the Risk Management Policy, Strategy and risk register.



Risk Management Framework

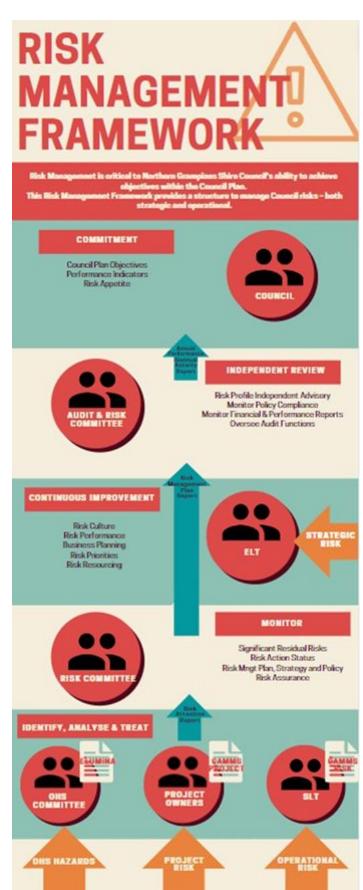
The Risk Management Framework provides the structure, communication/reporting paths, authority and arrangements for managing risk effectively at Northern Grampians Shire Council. This framework ensures that information about risk derived from the risk management process is adequately reported and used as a basis for decision making and accountability at all relevant organisational levels.

The key **objectives** of the Risk Management Framework are to:

- Respond to the objectives of the Council Plan
- Embed a commitment to the risk management framework
- Document accountability for the management and reporting of risks
- Support a consistent risk management practice aligned to the Standard

The **focus** for risk management maturity includes:

- Increasing the competency levels of staff in the management of risk
- Developing a culture where risk assessment and management is a part of everyday practice
- Providing accessible resources and information to staff
- Continuing to embed risk management through the integration of techniques and processes within current systems and practices
- Financing the recurrent insurable risk in the most efficient way
- Improving the scope and type of management information available for the monitoring and review of risk
- Training for staff
- Management review and reporting



Strategic Risk

Strategic risks are generally risks that relate to the Council Plan goals. They tend to be longer term and/or are of strategic importance and can impact the council's strategic intent. It is possible for some operational risks to be of strategic importance and be classified as strategic.

In preparation for each four- year Council Plan, the Strategic Risk Register is periodically reviewed and the outcomes utilised to inform several planning processes. Responsibility for identifying and monitoring strategic risk primarily rests with the Executive Leadership Team with delegations to the Risk Committee. The strategic risks for council are contained within the risk register.

Operational Risk

Operational risks are associated with the delivery of services and the day-to-day business activities of the organisation. The scope includes ensuring there is effective and efficient use of council's resources. Operational risks are primarily the responsibility of the Senior Leadership team, and the monitoring and reporting responsibilities reside with the Risk Committee. All departments review risks within their areas through the preparation of formal risk assessments in accordance with the Risk Management Strategy. All department managers are responsible for periodically reviewing their areas of activity to assess potential risks, develop strategies to address those risks and determine the effectiveness of the control measures they have implemented.

An annual review of risk across the departments shall be conducted. This review shall address both the internal and external environments, and risk associated with business activities and/or service delivery. The review shall establish the level, nature and form of key threats and vulnerabilities and exposure of the department's activities. The department must also generate a plan to define where specific actions will be required which will be recorded and monitored in CAMMS Risk Management software. The Operational Risk Register will be reviewed and monitored by the Risk Committee.

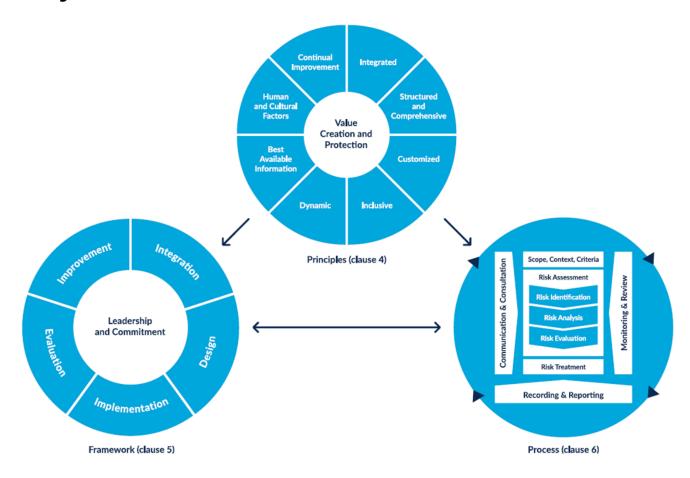
Common operational risk categories are: financial, reputation, safety, IT, people, public health, environmental, governance, legal and compliance/regulatory and reflect day-to-day business activities.

Project Risk

Project risks are associated with the delivery of capital expenditure activities of the organisation which are linked to the council strategic objective outcomes. The scope includes ensuring there is adequate approval, funding, resources and monitoring of council projects. Project risks are primarily the responsibility of the project owner, and the monitoring and reporting responsibilities reside with the project sponsor. Projects risks are captured, assessed and monitored via the CAMMS Project module (and linked to CAMMS Risk) with assigned access levels for maintaining approval and review.

Common project risk categories are: scope, cost, time, technology, resources, communication and procurement.

Risk Management Process



Establish the Context

This step is essential to determine:

- The objective/s being achieved What do we want to do or achieve?
- Why and what type of risk assessment is required What criteria will we use to analyse risk?
- How will the rest of the risk management process be structured?
- What information is required to understand the risk both internal and external?
- What subject matter experts should be consulted who will be involved in or affected by what we want to do? Do any of the stakeholders need to be involved in the risk assessment?
- How will we know we have been successful?
- What records do we need to keep?

Identify the Risks

What, where, when, how and why can things happen to prevent us from achieving our success measures? Risks that have not been identified cannot be assessed. Methods to identify risks include:

- a brainstorming session with all stakeholders
- checklists developed for this or similar events/activities/projects
- an examination of previous events/activities/projects of this type
- the constitution of an experienced panel to consider the event/activity/project

Risk areas may include, but are not limited to:

- management (planning, supervision, leadership)
- people (competence, skills, experience, reliability, safety, training, insurance)
- property and other assets (availability, suitability, damage, insurance)
- information (privacy and protective data security)
- financial (funding, sponsorship, salaries, budgeting, control)
- regulatory/legal (statutory requirements, committee duties and responsibilities, Duty of Care to stakeholders)
- political (community participation and support, Government policies, risk of adverse publicity)
- weather (heat, cold, rain, fire ban, fog)
- communication (Memorandum of Agreement/Memorandum of Understanding required, meetings, marketing, methods and frequency of contact?)
- business continuity
- anything else you can think of (nobody knows your activity better than you!)

All risks identified should be captured within the risk register.

Analyse the Risks

Inherent Risk

How severe are the risks we have identified? Determine how likely a risk is to occur and how large the impact would be if it did occur.

Refer to Appendix A for the Risk Matrix and Likelihood and Consequence scales.

Analyse to:

- identify source and cause
- assess current controls, effectiveness and determine gaps
- consider how likely are/what are the impact(s)
- determine the risk rating = likelihood and impact (consequences)

This will determine the inherent risk rating for each identified risk.

Evaluate the Risks

Are there any controls already in place? Determine if there are any existing controls already in place to address the identified risks. Existing controls could include any policies, processes or procedures established to:

- eliminate or reduce the likelihood of a risk occurring
- mitigate the impact if a risk does occur
- share or transfer the identified risk (eg: insurance and /or indemnity clauses)

Evaluate to:

- accept the risk or not
- escalate to necessary reporting levels
- prioritise risks
- consider options
- decide what action is required
- identify resources required

Determine how adequately the existing controls address the risk (strong, satisfactory, needs improvement, unsatisfactory, totally ineffective).

Residual Risk

Controls influence how a risk is rated. Once existing controls have been identified, risks need to be reevaluated and prioritised, to ensure that the greatest risks are addressed first. The process to follow is:

- note any existing controls identified against the appropriate risks in the risk register
- re-assess the risk using the Risk Matrix in Appendix A in light of existing controls and adjust its risk rating accordingly

Some common controls include legislation, delegations, committees, reporting, policies, procedures, qualifications, insurance, position descriptions, equipment, training, audits and codes of conduct.

Treat the Risks

What are we going to do about the risks we have identified? After a risk has been entered onto the council risk register, treatment options must be considered for risk that are not tolerable (i.e. high or extreme). Treatment options include:

- the actions which will be taken to address the risk and why
- the department head/manager/officer responsible for ensuring that the option is carried out (Responsible Person)
- when the specified actions are to be completed by

Unless actions are determined and responsibilities for them are allocated, the risk identification and evaluation processes will have been wasted.

Effective risk management is based on a structured approach to the management of risk that emphasises a proactive rather than reactive response. Treatment of risk will be addressed in the following order;

- **eliminate** the risk whenever possible
- mitigate (reduce) the likelihood and consequence to a tolerated level, should the risk occur
- **transfer or share** the risk, generally through insurance or contracting out (for specialised skills and service requirements)
- if significant risks cannot be eliminated or mitigated to a tolerated level, consider **avoiding** the activity. Alternatively, taking or increasing the risk in order to pursue an opportunity

Risks are a function of service delivery and as such must be considered as part of each annual business plan. Include risk indicators so that all of council's operations are monitored and evaluated regularly to ensure high service standards.

Monitor and Review - Risk Assurance

Have we got it right? Registered risks will remain within risk register until they have been reduced and accepted or eliminated. The risk owner must monitor their risks and controls within the register to ensure that agreed actions are being taken and verify the implemented controls are adequately addressing the risk.

The risk owner must also ensure the risk is continued to be reviewed for any changes and implement audit activities if necessary to provide assurance. The Risk Committee and or Audit & Risk Committee will also identify high risks to be audited internally or externally and include in an annual audit plan.

Record the Risk Management Process

Each stage of the risk management process must be captured appropriately within the risk register to ensure the risk management activities are traceable. Risk management records provide the foundation for process and service delivery improvement.

Due to the sensitivity of information, access to the risk register is limited to the Executive and Senior Leadership Teams and the risk register administrator. Risks contained within the register have a permanent retention period.

Risk Escalation

Where risks arise that are considered to be extreme or high these risks must be escalated to the Executive Leadership Team and Audit & Risk Committee for action and decision on the most appropriate treatment measures.

Managing Inter-agency Risk and State Significant Risks

Council has inter-agency arrangements as follows:

DHHS - public health, immunisations, HACC, Recovery etc.

DET - Playgroup

DEECA - public land management (standard lease/licence template)

Council officers negotiating inter-agency arrangements are to ensure adequate governance requirements are documented and endorsed ensuring clear accountability, roles and responsibilities for risk management. Any risks identified from the inter-agency arrangements will be included and the council risk register.

State significant risks such as:

- an earthquake, flood, windstorm or other natural event
- a fire
- an explosion
- a road accident or any other accident
- a plague or an epidemic or contamination
- a warlike act or act of terrorism
- a hijack, siege or riot
- a disruption to an essential service

are managed within the Northern Grampians Shire Municipal Emergency Management Plan (MEMP) and included in the Council risk register. The MEMP provides information to emergency services, responsible authorities, other organisations, and the community on how risks will be dealt with and the management arrangements for emergencies, and to promote community safety and develop resilience.

The MEMP provides detail on risk specific response and recovery arrangements, identifying hazards that are likely to impact the municipality and the role organisations play in relation to managing emergency events.

Appendix A – Risk Matrix / Consequence and Likelihood scales

	Consequence				
Likelihood	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
5 (Almost Certain)	Medium	High	High	Extreme	Extreme
4 (Likely)	Medium	Medium	High	High	Extreme
3 (Possible)	Low	Medium	High	High	High
2 (Unlikely)	Low	Medium	Medium	Medium	High
1 (Rare)	Low	Low	Low	Medium	Medium

Table 1 - Likelihood Scale - The probability that a risk will occur

	rable:			
Level	Descriptor	Description		
5	Almost Certain	>80% chance in next 12 months; event expected to occur most times during normal operations		
4	Likely	50-80% chance in next 12 months; will probably occur at some stage based on evidence of previous incidents		
3	Possible	25-50% chance in next 12 months; not generally expected to occur but may under specific circumstances		
2	Unlikely	10-25% chance in next 12 months; conceivable but not likely to occur under normal operations		
1	Rare	Less than 10% chance in next 12 months; only ever occurs under exceptional circumstances		

Table 2 - Consequence Scale

	i able 2 - Consequence Scale			
Level	Descriptor	Potential Impact		
		In terms of the success measures of the activity		
5	Catastrophic	 Direct loss or opportunity cost > \$10m; financial impact could not be managed within corporate budget Multiple fatalities/extensive long-term injuries; worse case loss Significant loss of customers, major disruption or cessation of services over extended time (>1 month); event/project/activity would never be carried out again Actual or potential loss of licence, penalties on directors, serious litigation including class action Substantial damage to brand resulting from extensive negative national publicity Devastation to a large area. State significant environmental event Significant loss of confidentiality or data integrity, very serious incident, system unavailable for more than 48 hours 		
4	Major	 Direct loss or opportunity cost of between \$1m and \$10m. Significant reworking of corporate budget incl cuts to items Extensive serious injuries or fatality to individual; very high loss to organisation Loss of customers, high disruption or cessation of services, extensive effort to resolve (up to 1 month); most success measures threatened or one severely affected. Major systemic or breaches, significant fines/imposition of regulatory restrictions, major litigation Damage to brand resulting from detrimental national publicity or extensive adverse local publicity Severe long-term effect on protected wildlife or plants. EPA prosecution Some loss of confidentiality or data integrity, serious incident, system unavailable for 24-48 hours 		
3	Moderate	 Direct loss or opportunity cost of between \$100k and \$1m Individual injury likely to result in time off work; significant injury involving medical treatment or hospitalisation; 		

		 Moderate disruption or cessation of services (1-3 days), impacts cannot be absorbed into normal operations; some success measures affected with considerable effort necessary to rectify Systemic complaints or compliance incidents, fines, minor litigation Temporary damage to brand resulting from limited negative national publicity or detrimental local publicity Short term effect on protected wildlife or plants. Emission discharge/contaminate spill exceeding EPA reportable levels Small, isolated loss of confidentiality or data integrity, significant incident, system unavailable for 4-24 hours
Level	Descriptor	Potential Impact
		In terms of the success measures of the activity
2	Minor	 Direct loss or opportunity cost of between \$10k and \$100k Some medical treatment required; first aid treatment for minor injuries Minor disruption to service, minimal time, effort and cost to resolve; success measures able to be achieved with some effort Individual legal action, local regulatory enquiry/improvement notices, low range fines Minimal damage to brand resulting from limited negative local publicity Emission discharge/contaminate spill not exceeding EPA reportable levels Small, isolated loss of confidentiality or data integrity, minor incident, system unavailable for 1-4 hours
1	Insignificant	 Direct loss or opportunity cost of <\$10k. Impact easily manageable within jurisdictional budget. No impact. First Aid only required Impact absorbed through normal operations; Able to be rectified using management processes. One off complaints or compliance incidents No measurable impact to brand, limited negative local publicity Contaminate spill contained on premises Recoverable data loss, non-sensitive data leak, minor incident resolved using normal work procedures, system unavailable for <1 hour

Terms and Definitions

Risk management process: definitions			
Consequence	The outcome of an event affecting organisational objectives.		
Control	The measure that is modifying a risk.		
Establishing the context	Defining the external and internal parameters to be taken into account when managing risk and setting the scope and risk criteria.		
Event	The occurrence or change of a particular set of circumstances.		
External context	The external environment in which the organisation seeks to achieve its objectives.		
Internal context	The internal environment in which the organisation seeks to achieve its objectives.		
Likelihood	The chance of a risk event occurring.		
Monitoring	Continual checking, critically observing or determining status in order to identify change from the performance level required or expected.		
Operational Risk	Operational risks are linked to the Business Plan objectives and take into consideration risks which will prevent Departments from delivering their annual business plans and ongoing services to the community		
Residual risk	The risk remaining after risk treatment.		
Risk	The effect of uncertainty on objectives. An effect is a deviation from the expected and can be either positive or negative.		
Risk analysis	The process to comprehend the nature of risk and to determine the level of risk.		
Risk assessment	The overall process of risk identification, risk analysis and risk evaluation.		
Risk attitude	The organisation's approach to assessing and eventually pursuing, retaining, taking or turning away from risk.		
Risk criteria	The terms of reference against which the significance of a risk is evaluated.		
Risk evaluation	The process of comparing the results of a risk analysis with the risk criteria to determine whether the risk and/or its magnitude are acceptable or tolerable.		
Risk identification	The process of finding, recognising and describing risks.		
Risk management	The coordinated activities to direct and control an organisation with requirements to manage risk.		
Risk management framework	The set of components that provide the foundations and organisational arrangements for designing, implementing, monitoring, reviewing and continually improving risk management throughout the organisation.		

Risk management plan	The scheme within the risk management framework that specifies the approach, the management components and the resources that are to be applied to the management of risk.	
Risk management policy	The statement of overall intention and direction of an organisation related to risk management.	
Risk management process	The 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.	
Risk owner	The person or entity with the accountability and authority to manage a risk.	
Risk profile	The description of any set of risks.	
Risk source	An element that, either alone or in combination, has the intrinsic potential to give rise to a risk.	
Risk treatment	The process to modify risk.	
Stakeholder	A person or organisation that can affect, be affected by or perceive themselves to be affected by a decision or activity.	
Strategic Risk	Strategic risks are the risks that will prevent Council from meeting the objectives outlined in the Council Plan	
Reference: ISO 31000:2018 Risk management—guidelines		

Review history

Date	Review details	Action
October 2018	Strategy reviewed and new version drafted.	ELT approved.
1 April 2019	Reported to Audit Committee for endorsement	Strategy endorsed
6 May 2019	Reported to Council	Adopted by Council
7 May 2021	Updated to include AS ISO 31000:2018 principles	
21 February 2022	Included Project Risk responsibilities	
13 June 2023	Annual review, no significant changes required	
28 November 2024	Amended to reflect ISO 31000:2018 diagram, included Environmental Protection Act 2017 in key legislation, and added public and environmental risks.	