



INTEGRATED RISK MANAGEMENT FRAMEWORK

1. INTRODUCTION: WHY DO RISK MANAGEMENT?

The *Local Government (Audit) Regulations 1996 Regulation 17* requires that the CEO review the appropriateness and effectiveness of a local government's systems and procedures in relation to risk management, internal controls and legislative compliance. The review is to be reported to the Town's Audit & Risk Management Committee every two years. As such, the Town seeks to implement an effective risk management system that identifies risks relating to its strategic and operational plans, mitigates risk through internal controls, and ensures that its legislative compliance requirements are continually met. This will be achieved by adopting an Integrated Risk Management Framework (IRMF) that will dually serve as a crucial informing strategy for its wider Integrated Planning Framework and meet requirements as specified within the Regulations. It is anticipated that the IRMF will add value to the Town's decision-making processes by guiding prioritisation and allocation of resources, improving ability to achieve the objectives of the organisation, and by promoting forward planning.

What is "Risk"?

The International Risk Management Standard AS/NZS ISO 31000: 2009 ("**AS/NZS ISO 31000: 2009**") defines risk as "*the effect of uncertainty on objectives*", measured in terms of likelihood and consequence. Risk Management is the process of applying a logical and systematic method of identifying, evaluating, treating, monitoring and communicating risks associated with any activity, function or process. In the context of the Town of Claremont, risk can be categorised into three broad types:

- **Strategic Risks** are those risks which are generally entity wide, may impact on the ability of Council to achieve its objectives set out in the Strategic Community Plan and / or the delivery of critical services;
- **Operational Risks** are those risks which may impact on the achievement of directorate, business unit or service unit plan objectives; and
- **Special Risks** are risks specific to an area of operation within the business unit (i.e. Aquatic Centre, CCH, Library, etc.), or risks for special events (i.e. Christmas in Claremont, Terrace Nights, etc.) held by, and within, the Town.

Risk Management Objectives

In adopting this Integrated Risk Management Framework ("IRMF"), the Town aims to:

- Ensure that the Town achieves its strategic objectives as set out in the Strategic Community Plan, 'Claremont Ahead 2027' by integrating risk management into strategic and business planning;
- Highlight which areas of the Town's risk profile have the capacity to deliver the maximum benefit or maximum harm, and to identify those areas which should receive priority action;
- Establish a reliable basis for decision making and ensure that risk is included as a fundamental component in the planning process, and is applied to contractual arrangements and projects;
- Ensure the effective allocation of resources;
- Determine how risk should be reported to Council, the Audit Committee and Risk Management Committee, and external auditors;
- Foster an organisational culture which promotes proactive behaviour regarding the identification and treatment of risk;
- Identify and prepare for emerging risks, future events and change; and
- Address uncertainty and improve stakeholder confidence and trust.



2. OUR RISK STATEMENT

To provide clear guidance on the Town's approach to risk, its 'Risk Appetite' and 'Risk Tolerances' are conveyed through an overarching 'Risk Statement', where –

- Risk Appetite refers to the amount and type of risk that the Town is willing to pursue or retain in pursuit of value; and
- Risk Tolerance refers to the Town's readiness to bear risk in order to achieve its objectives.

The purpose of taking this approach is to create a sound foundation for risk management. Setting the risk appetite explicitly articulates the attitudes (*appetite*) to and boundaries (*tolerance*) of risk that the Council expects senior management to take. Without this, risk management will be carried out with unclear boundaries and expectations, resulting in an organisational culture where decisions are made without consideration of risk.

The Town's 'Risk Statement' in relation to identified key risk categories are listed below:

Ethical Leadership – Low Risk

Without a strong emphasis on ethics, the Town cannot be successful in achieving the objectives of its Strategic Community Plan and fulfil its responsibilities to the community. Ethics, integrity and critical thinking will be expected of all Elected Members, Committee Members, and employees.

As the Town is **risk averse** in issues of ethical leadership, the Town is not willing to intentionally accept risks in any situation that compromises the Town's position of showing leadership in ethical decision-making and integrity to the community. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- Having a perceived bias in decision-making both internally and externally
- Formal allegations of corruption, misconduct or other improper practices
- Unfair disadvantage or advantage of people or groups of people

Strategic Direction – Moderate Risk

The Town cannot be successful in achieving the objectives of its Strategic Community Plan without clear goal setting, and forward planning. Understanding that unanticipated issues may arise from time to time, the Town will make every effort to achieve, or significantly progress, its key deliverables.

Taking a **balanced risk approach**, the Town is only willing to accept a balanced risk of potential disruption in its capacity to progress in its strategic direction. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- A significant change in a strategic objective
- A delay in project delivery of over 12 months
- Exceeds the capacity of the Long-Term Financial Plan

Reputation – Low Risk

The Town's Elected Members, Committee Members, and employees are expected to uphold values within the Town's Code of Conduct at all times, whilst ensuring to employ ethical decision-making, and a customer-centric approach when dealing with its constituents.

As the Town has a **low risk approach** to reputation, the Town is not willing to accept risks in most circumstances that may result in reputation damage. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- Negative publicity in statewide publications and media
- A formal inquiry by the State or other integrity agencies



- Loss of public confidence in the Town's Elected Members, Committee Members and employees

Governance – Low Risk

The Town will put in place a strong governance framework with a focus on principles of good governance, informed and consistent decision-making, and compliance with all legislative, regulatory and reporting requirements whilst promoting continuous improvement.

As the Town is **risk averse** in its approach to governance, the Town is not willing to intentionally accept risks in most circumstances that may result in non-compliance with its governance processes. For example, the Town will only tolerate risks in this category as long as it does not result in the following:

- Legislative non-compliance
- Non-compliance with the Town's Governance Framework

Community and Stakeholder Management – Moderate Risk

Every effort will be made to ensure that the Town develops strong and positive relationships with the community and with other key stakeholders. The Town will ensure that all community and individual considerations are taken into account in its decision-making through a 'big-picture' or 'community-wide' approach.

Taking a **balanced risk approach**, the Town is only willing to accept a balanced risk of potential disruption to how Town manages its relationship with key stakeholders, whilst continuing to make decisions for the greater public good. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- Non-compliance with public consultation requirements
- Non-compliance with the Town's Public Consultation Policy

Financial Resources – Low Risk

The Town will carefully manage expenses, plans and financial commitments to remain within its approved annual and long term budgets. In order to ensure that the Town is well equipped for financial uncertainty, the Town considers its budget with a long-term outlook through effective long term financial planning, and a long term asset management plan.

As the Town has a **low risk approach** to its financial resources, the Town is not willing to accept risks in most circumstances that may result in the disruption of its long-term financial plan and its financial position. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- Individual projects doesn't exceed 15% over budget
- Annual budget doesn't go into deficit
- Initiatives are within the capacity of the long-term financial plan

Environmental Responsibility – Low Risk

The Town will act responsibly in adopting environmentally sustainable practices within the resources it has available for this purpose. To provide amenity for the community, the Town is committed to preserving its natural environment.

Taking a **balanced risk approach**, the Town is only willing to accept a balanced risk of potential disruption in its environmental responsibility. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- Loss of canopy cover within property controlled by the Town
- Increased overall carbon footprint of the Town



- Intentional harm to flora and fauna

Capacity to Deliver Services – Low Risk

The Town will ensure that its capacity to delivery statutory and discretionary services to the community are not disrupted.

As the Town has a **low risk approach** to its capacity to deliver services, the Town is not willing to accept risks in most circumstances that may result in loss of services. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- Loss of statutory services
- Loss of discretionary services already offered (without alternatives presented)
- Delay or non-completion of new or renewal infrastructure project beyond financial year (or scheduled completion period if project runs across multiple years).

Organisational Health and Safety– Low Risk

The Town places a high priority on providing a safe workplace for staff, volunteers and contractors. This includes fostering a work place that focuses on a healthy work/life balance and promotes a positive working environment.

As the Town has a **low risk approach** to its management of OHS and well-being within the workplace, the Town is not willing to accept risks in most circumstances that may result in detriment in both areas. For example, the Town will only **tolerate** risks in this category as long as it does not result in the following:

- Injury or death to an employee (including contractors)
- Injury or death to a member of the public
- Breach of the Town's policies and procedures relating to organisational and individual well-being (i.e. People Management; Elimination of Violence, Harassment & Bullying in the Workplace; Equal Opportunity)

Business Continuity – Low Risk

The Town is committed to being a resilient organisation that operates efficiently, with minimal disruption. As such, the Town places importance on programs that enable that Town to better anticipate disruption, adapt to events, and respond and recover from potential business disruptions.

As the Town is **risk averse** in its approach to business continuity, the Town is not willing to intentionally accept risks in most circumstances that may result in disruption to the operation of the business. The Town will **tolerate** risks in this category as long as it does not result in the following:

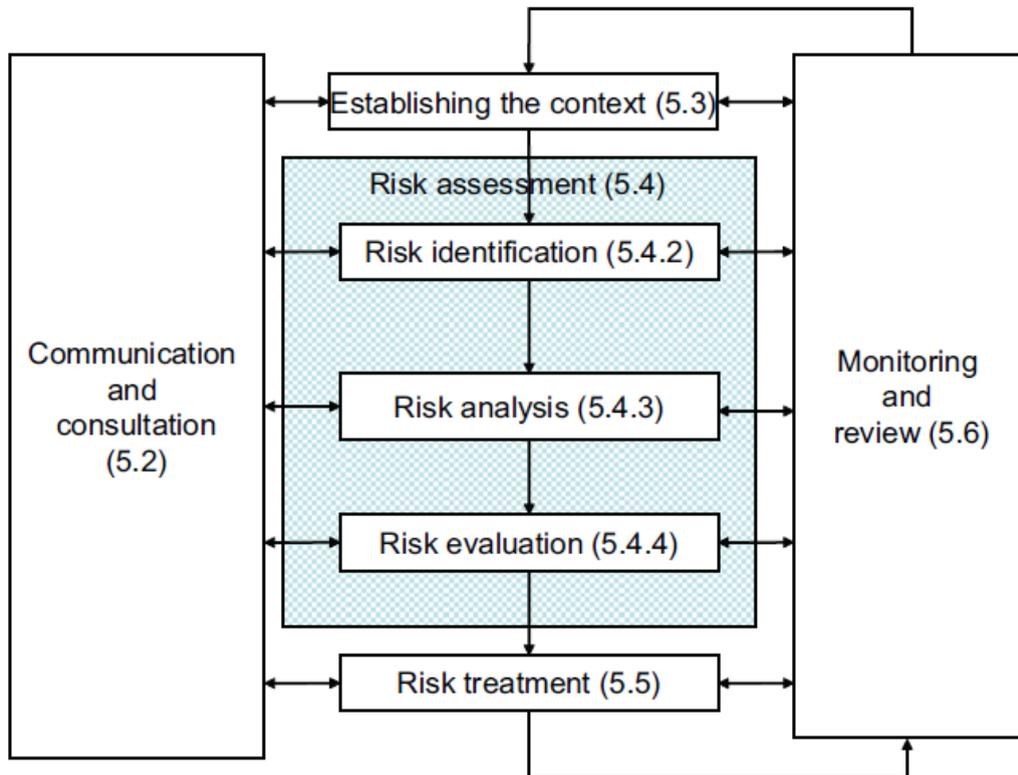
- Non-compliance with the Town's Business Continuity Plan
- Loss of any statutory service for more than 48 hours outside of normal scheduled services.
- Loss of operational continuity (excessive staff turnover, etc.)
- Any loss of corporate knowledge (records systems, backups)
- Undocumented corporate knowledge (processes and procedures,)



2. OUR RISK MANAGEMENT FRAMEWORK

2.1 Purpose

The purpose of this IRMF is to set out Council's risk management processes and procedures and the rationale behind them. It follows the recommendations set out in *AS/NZS ISO 31000:2009* which include:



- Roles and responsibilities for managing risk;
- How we identify, assess and rate risks (including effectiveness of controls);
- How we monitor, review and report risks; and
- How we measure our Risk Management performance.

It should be noted that the above processes and procedures will not eliminate Council's risk but will help to manage it in a way that is transparent and in accordance with best practice and good governance principles.

2.2 Risk Identification Process

The Town's risk management process is about understanding its risk appetite in the context of identifying potential risk in delivering its key objectives, and in implementing internal controls to bring its residual risk as close as possible to its accepted risk appetite for that identified risk. This process involved consultation of key stakeholders, monitoring, evaluating, and reporting on its progress.

The Town's risks can be identified through a number of means, including but not limited to:

- Strategic planning
- Internal and external audits
- Analysis of CouncilFirst requests



- Insurance claims
- Complaints and community feedback
- Project planning
- Performance reporting
- External review and reports by external agencies
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In establishing this IRMF, the Town has identified its key strategic and operational risks through assessment of its strategic documents, and through consultation with key stakeholders.

2.3 Risk Management Process

The risk management process is a series of steps that enable risks to be identified, analysed and treated in the context of the environment in which the Town operates. The main elements of the risk management process are as follows:

Communication consultation	and	Effective communication and consultation should take place throughout the risk management process to ensure that those accountable for implementing risk management and stakeholders understand the basis on which decisions are made.
Establish the context		This identifies the Town's objectives and defines the internal and external environment in which it operates. Understanding the external context is important in order to ensure that the objectives and concerns of external stakeholders are considered. Understanding the internal context will enable risk management to be aligned with the Town's culture, structure, strategies and processes.
Risk identification		Sources of risk, areas of impact, their causes and potential consequences should be identified. This will generate a comprehensive list of risks based on events that might create, enhance, prevent, degrade, accelerate or delay the achievement of objectives. Comprehensive identification is crucial as a risk not identified will not be included in any analysis.
Risk analysis		This involves the consideration of the causes and sources of risk, their consequences and the likelihood that those consequences can occur. Existing controls and their effectiveness should be taken into account. Risk analysis provides an input to risk evaluation and decisions on the most appropriate risk treatment strategies.
Risk evaluation		Risk evaluation assists in making decisions, based on the outcomes of the risk analysis, about risk treatment and priorities. Risk evaluation involves comparing the level of risk found during the analysis process with pre-established risk criteria. The risk criteria and the Town's risk appetite will help influence the decisions on risk treatment.
Risk treatment		Selecting the most appropriate risk treatment option involves balancing the cost and efforts of implementation against the benefits derived. A number of treatment options may be considered and can be applied individually or in combination. Risk treatment plans should be prepared which document how the



chosen treatment options will be implemented.

Monitor and review

The Risk Management process should be continually monitored and reviewed to ensure that controls are effective, new information is gathered, latest changes and trends are identified, successes and failures are recorded, lessons are learned, changes in internal and external context are detected and emerging risks are captured.

2.4 Risk Assessment Process

Once risks have been identified, the Town will conduct a periodic risk assessment of all new and existing risks. Risk assessment criteria has been establish for analyzing and evaluating risks. The criteria is based on the likelihood of the risk occurring (Risk Likelihood Matrix) and its consequences (Risk Consequence Matrix) – a combination of which establishes the overall level of risk (as per the Risk Level Matrix).

2.4.1 Risk Likelihood

First, the risk is assessed quantitatively by the likelihood of its occurrence/ frequency using the table below:

Risk Score	Risk Rating	Frequency	Probability of Occurrence
5	Almost certain	Once per annum	95% chance
4	Likely to occur	Once every 3 yrs.	71%-94% chance
3	Possibly will occur	Once every 5 yrs.	31% – 70% chance
2	Unlikely to occur	Once every 10 yrs.	6%-30% chance
1	Occurrence is rare	< Once every 10 yrs.	< 5% chance

2.4.2 Risk Consequence

Next, the risk is measured qualitatively against the severity of consequences should it occur as per the table below:

Risk Score	Risk Rating	Revenue, Cost or Liability <i>(Third Party or Business Loss)</i>	People <i>(Health & Safety)</i>	Environment	Corporate Image <i>(Probity/Political/Economic)</i>
5	Catastrophic	<ul style="list-style-type: none"> Liability cost or business loss to Council > \$1M Council officer or Councillor jailed 	<ul style="list-style-type: none"> Loss of life Town-wide epidemic 	<ul style="list-style-type: none"> Serious damage of state-wide significance Prosecution (cost as per revenue impact) Impact not fully reversible 	<ul style="list-style-type: none"> CCC or WA Police investigation Public/media outrage Statewide/National media coverage Public pressure to stop operations of the Council Management changes demanded
4	Major	<ul style="list-style-type: none"> Liability cost or business loss to Council of between \$250K to \$1M Council officer and/or Councillor with significant fine 	<ul style="list-style-type: none"> Serious health impact on multiple members of public or staff 	<ul style="list-style-type: none"> Serious damage of state-wide significance Prosecution likely (cost as per revenue impact) Impact reversible within 10 years 	<ul style="list-style-type: none"> PSC, DLGC or WA Ombudsman investigation Loss of community confidence in Council Public/media concern Statewide coverage Damage to Council's reputation Formal inquiry/sanctioned
3	Moderate	<ul style="list-style-type: none"> Liability cost or business loss to Council of \$30K to \$250K Council personnel fined 	<ul style="list-style-type: none"> Moderate health impact on a member of the public or staff Medical attention required 	<ul style="list-style-type: none"> Moderate damage of local significance Prosecution probable (cost as per revenue impact) Impact reversible within 1 year 	<ul style="list-style-type: none"> Community discussion and concern Community Petition or Special OCM convene Local media adverse report
2	Minor	<ul style="list-style-type: none"> Liability cost or business loss to Council of \$10K to \$30K 	<ul style="list-style-type: none"> Minor injury/health impact on a member of the public or staff 	<ul style="list-style-type: none"> Minor damage of local significance Prosecution possible (cost as per revenue impact) Impact reversible within 3 months 	<ul style="list-style-type: none"> Minor/isolated concerns raised by groups of members of public, customers, suppliers
1	Insignificant	<ul style="list-style-type: none"> Minimal liability cost or business loss to Council < \$10K 	<ul style="list-style-type: none"> Minimal First Aid required Temporary, minor health impact on a member of the public or staff 	<ul style="list-style-type: none"> Minimal release of pollutants which does not require notification to third parties Brief, non-hazardous temporary pollution, reversible within a week 	<ul style="list-style-type: none"> Event only of interest to individuals No impact on community; Marginal impact on Council operations Resolved in day to day management



2.4.3 Overall Risk Rating

The 'Risk Scores' of from both the 'Risk Likelihood' and 'Risk Consequences' are then multiplied to get the 'Overall Risk Rating' (RL x RX = OR).

Likelihood	Almost Certain 5	5	10	15	20	25
	Likely 4	4	8	12	16	20
	Possible 3	3	6	9	12	15
	Unlikely 2	2	4	6	8	10
	Rare 1	1	2	3	4	5
		Insignificant 1	Minor 2	Major 3	Critical 4	Catastrophic 5
		Consequences (C)				

Score	Description
1-5	Low
6-12	Moderate
13-19	High
20-25	Extreme



2.5 RISK EVALUATION PROCESS

2.5.1 Effectiveness of Controls

In order to assess the significance of each risk, Council rates the effectiveness of the relevant “controls”. A control can include any process, policy, device, practice or other action which impacts on the consequence or likelihood of a particular risk occurring.

Effectiveness	Description
Highly Effective	<p>Controls are well designed to minimise downside risk and are clearly documented and embedded into the culture. Accountabilities are understood.</p> <p>There is no clear need to improve the controls within the organisation’s present appetite for risk except in a dynamic environment or as part of a commitment to continuous improvement.</p>
Moderately Effective	<p>Controls address majority of root causes of downside risk but are not yet fully documented or embedded into the culture. Recent changes in accountabilities are not yet fully understood. To ensure that the risk is managed in accordance with Council’s appetite for risk, controls should be tightened. This may be a matter of ensuring that treatment plans are progressing and/or completed.</p>
Less than Effective	<p>Controls do not satisfactorily address several of the root causes of downside risk. Council is exposed to a higher level of risk than it would normally tolerate and remedial action is required.</p>
Not Effective	<p>Council does have in place any procedures designed to mitigate against this risk. Council must take steps to understand this risk as a matter of priority in order to design and implement appropriate controls as soon as possible.</p>



2.5.2 Risk Treatment

By assessing the risk's initial rating, along with the effectiveness of its existing controls, the Town is then able to assign a Residual Risk rating to each particular risk. The Residual Risk rating will then determine Council's response (i.e. how the risk should be treated) to bring the Residual Risk as close as possible to the Town's predetermined Risk Tolerance ('Acceptable Risk') for that Risk Category.

Residual Risk Rating	Risk Treatment
Extreme	<p>Immediate action required, including urgent interim actions e.g. cessation of activity is necessary to ensure safety.</p> <p>ACCOUNTABILITY: CEO, relevant Executive Manager, Supervisor and Governance Team must be advised.</p>
High	<p>Prompt action required to reduce risk to as 'low as reasonably practicable' is required.</p> <p>ACCOUNTABILITY: Relevant Executive Manager, Supervisor and Governance Team must be advised if risk owners are unable to fix promptly or if additional resources are required.</p>
Moderate	<p>If the Town's risk tolerance is exceeded, actions should be taken to reduce risk to as 'low as reasonably practicable' in a timely manner.</p> <p>ACCOUNTABILITY: Supervisor and risk owner (if applicable). Advise Governance Team of action taken for recording.</p>
Low	<p>Risk is likely to be acceptable. Implement treatment plan.</p> <p>ACCOUNTABILITY: Risk owner. Advise Governance Team of action taken for recording, if applicable.</p>

2.5 Integrated Risk Register

An Integrated Risk Register (IRR) will be used to capture the Town's strategic, operational and special risks. The IRR will be reported to the Executive Management Team monthly, and the Audit and Risk Management Committee on a quarterly basis. While the IRR will be managed and monitored by the Governance business unit, further actions to be completed to reduce risks is the responsibility of the Manager for that relevant area.

Reference ID	Last Reviewed	Description of Strategic Risk	Operational Impact of Strategic Risk	Risk Types	Likelihood	Seriousness	Risk Rating	Existing Controls	Residual Risk	Further Action	Accountability	Acceptable Risk	% Complete	Target Date	Progress Comments
PRINCIPLE ONE: LEADERSHIP AND GOVERNANCE															
S1. Our stakeholders are well informed and we provide opportunities for community engagement															
		Failure to consult with community regarding the Town's programs and initiatives	<ul style="list-style-type: none"> ▶ Non-compliance with public notice/ consultation requirements as the <i>Local Government Act 1995</i> ▶ Dissatisfaction from community regarding the Town's major projects ▶ Poor public perception of the Town's administration 	Reputational Legal											

Reference ID – This corresponds with the reference number as allocated with the Corporate Business plan.

Last Review – This is the last review date (i.e. risks to be reviewed in accordance with its risk profile, further actions, etc.)

Description of Strategic Risk – The 'high level' risk description as it relates to the Town's specific strategic objective.

Operational Impact of Strategic Risk – The 'operational level' risk description as it relates to the Town's Corporate Business Plan deliverables.

Risk Type – As defined in Section 2.4.3 Risk Type.

Likelihood – As defined in Section 2.4.1 Risk Rating.

Seriousness – As defined in Section 2.4.1 Risk Rating.

Risk Rating – As defined in s2.4 Risk Assessment Criteria. This is a result of an assessment of the likelihood and seriousness of the risk as a whole.

Existing Controls – The internal controls the Town current has in place to mitigate this risk.

Residual Risk – The remaining risk after the internal controls have been considered. This requires the modified risk (the original risk taking into consideration the existing internal controls) being reassessed under Section 2.4 Risk Assessment Criteria.

Further Action – These are a 'Recommended Actions' required in order to bring the 'risk profile' down to the Town's accepted risk appetite.

Accountability – This is the relevant officer responsible for ensuring that this risk is appropriate mitigations. This will either be the Executive Manager or Manager for the business unit.

Acceptable Risk – This is the Town's 'Risk Tolerance' and predetermined risk appetite for that risk area.

% Complete – The percentage of completion for the 'Further Action' as it related to reducing the risk down from the Residual Risk rating to the Town's accepted risk tolerance (/ risk appetite).

Target Date – This is the target date of completion for the 'Further Action' assigned to that risk.

Progress Comments – This is the most recent progress update relating to the risk's 'Further Action'.



3. OUR ROLES AND RESPONSIBILITIES

Audit & Risk Management Committee

The Audit & Risk Management Committee are responsible for reviewing reports from the Chief Executive Officer on the appropriateness and effectiveness of the Town's systems and procedures in relation to risk management, internal control and legislative compliance. The Audit & Risk Management Committee will report to Council the results of that review including a copy of the Chief Executive Officer's report.

Chief Executive Officer

The Chief Executive Officer is the overall sponsor of the risk management process and will set the tone and promote a positive risk management culture by providing firm and visible support for risk management. The CEO will review the appropriateness and effectiveness of the Town's systems and procedures in regard to risk management, internal controls and legislative compliance at least once every two calendar years and report the results of that review to the Audit Committee.

Executive Management Team (EMT)

EMT are responsible for the oversight of the Risk Management Framework, including the review of risk management procedures and policies on an annual basis. It is responsible for setting the tone and promoting a positive risk management culture within the Town. EMT maintains oversight of the highest level risks and takes responsibility for ensuring mitigation strategies are being implemented.

Senior Governance & Risk Advisor (SGRA)

The SGRA will drive the risk management process for the organisation by liaising with key stakeholders in both identifying risks, and in the recommendation of further actions to be implemented as guided by the Town's set risk appetite. Further to this, the SGRA is responsible for the overall reporting on the Town's IRMF, and in the evaluation of the Town's internal controls through the development and implementation of a risk-based internal audit (based on the information gathered in the IRR) from which further recommendations, advice and risk management strategies will be proposed to the EMT for approval. This will provide assurance on the efficiency and effectiveness of risk management processes.

Occupational Health & Safety Officer (OHSO)

The OHSO is responsible for identifying, monitoring and reporting on OHS risks for inclusion into the IRMF reporting process. The OHSO is further responsible in ensuring that risk mitigation actions are completed and implemented accordingly.

Operational Management Team (OMT)



Members of the OMT are responsible for completing risk management actions for risks identified within their areas. This will be done through liaising and communication of requirements to their relevant staff members and overseeing the action to completion.

Employees

All employees within the Town are expected to develop an understanding and awareness of their risks and how they can contribute to the risk management process. It is the responsibility of every employee within the Town to manage risks for which they are accountable. All employees are responsible for escalating/communicating risks to their immediate supervisor. Employees are also required to act in a manner that does not place at risk the health and safety of themselves, other employees, residents and visitors to the Town.

4. OUR COMMITMENT TO RISK MANAGEMENT

This Integrated Risk Management Framework, the Integrated Risk Register and any subsequent risk-based audits will be reviewed by both the Executive Management Team, and the Audit & Risk Management Committee at least on an annual basis. However, a full and thorough review of all processes relating the Town's risk management system is to be formally reviewed every three years, with the next full review due in February 2021.

This framework is to remain in force unless otherwise determined by Council.