

Risk policy



Authorised by board: 12 June 2019

Managing Director's authorisation: *Patrick W Dae*

Effective date: 25 June 2019

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1. PURPOSE

Risk management is about understanding and managing FRDC's environment and taking measures, where necessary, to ensure that risks are contained to acceptable risk tolerance levels consistent with FRDC's risk appetite statement. This documents sets out the FRDC's policy on managing risk and taking advantage of opportunities.

2. RESPONSIBILITY

Responsibility for this policy resides with the Managing Director.

3. DEFINITIONS AND ACRONYMS

Definitions - follow link to [Definitions](#)

Acronyms – follow link to [Acronyms and Abbreviations](#)

4. RISK CATEGORY

This policy covers the following risk categories

| Strategic | Reputational | Financial | Service Delivery (RD&E, Marketing, Trade) | Operational | People | Governance |
|-------------------------------------|-------------------------------------|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|
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5. RELEVANT DOCUMENTATION

This section contains links to internally and externally facing documents – access to internally facing documents is restricted to FRDC employees. This policy is not limited to the list below and is relevant to all FRDC Policies and Procedures.

| Relevant documentation |
|--|
| Internal |
| Fraud control plan procedure |
| Procurement policy |
| Procurement procedure |
| Risk management procedure |
| Risk Register All Risks |
| External |
| ISO 31000:2018 |
| Australian National Audit Office – Corporate planning, performance statements and risk management under the PGPA Act |
| Commonwealth Fraud Control Framework |
| Commonwealth Risk Management Policy |

6. PUBLICATION

This policy is to be made available on the directors' website and the FRDC website.

7. BACKGROUND

The FRDC's risk policy is based on the risk management international standard ISO 31000:2018 – Risk Management Guidelines and content from the Department of Finance

Risk Management Policy. The FRDC manages risk through a risk management framework comprising the:

- Quality Management System (QMS) Guidelines - AS/NZS ISO 9001:2015 certification
- Risk policy
- Risk register
- Risk management procedure
- Fraud control plan procedure

FRDC directors and management share the risk management role, with responsibilities and roles that reflect their respective environments. Risk management is embedded in everything the FRDC does. It is mandated by relevant legislation, and is incorporated in the FRDC's Quality Management System (QMS) that requires annual internal and external audits to maintain certification.

The FRDC also has obligations to manage risks under the *Public Governance, Performance and Accountability (PGPA) Act 2013*; specifically, Section 16:

'Duty to establish and maintain systems relating to risk and control'

The accountable authority of a Commonwealth entity must establish and maintain:

- (a) an appropriate system of risk oversight and management for the entity; and
- (b) an appropriate system of internal control for the entity;

including by implementing measures directed at ensuring officials of the entity comply with the finance law.

The Funding Agreement with the Department of Agriculture (DOA), requires FRDC to provide a copy of its risk management framework at intervals of no more than four years. FRDC's practice is to provide it annually, on completion of the annual review.

In June 2003 John Uhrig undertook, on behalf of the Australian Government, a *Review of the Corporate Governance of Statutory Authorities and Office Holders*. Subsequent guidelines issued by the Australian Government provided a list of factors that were taken into consideration when it decided to keep the FRDC as an entity governed by an independent board and not re-absorbed into a department of state (as was, for example, the Australian Fisheries Management Authority). These factors included:

- the body operates commercially with the intention of making a profit, in a competitive environment, and it would likely be classified as outside the General Government Sector
- the body has an entrepreneurial focus
- a governing board would provide effective governance for a body
- there is a clear rationale for the assets of the body to not be owned or controlled by the Commonwealth directly
- the body requires a degree of independence from general policies of the Australian Government unless applied after consultation and formal notification.

The entrepreneurial focus highlights the need for the FRDC to proactively engage with risk and not to be risk adverse.

For information about the FRDC, its vision, the board, staff and the Quality Management System refer to the most recent edition of the FRDC's [Annual report](#).

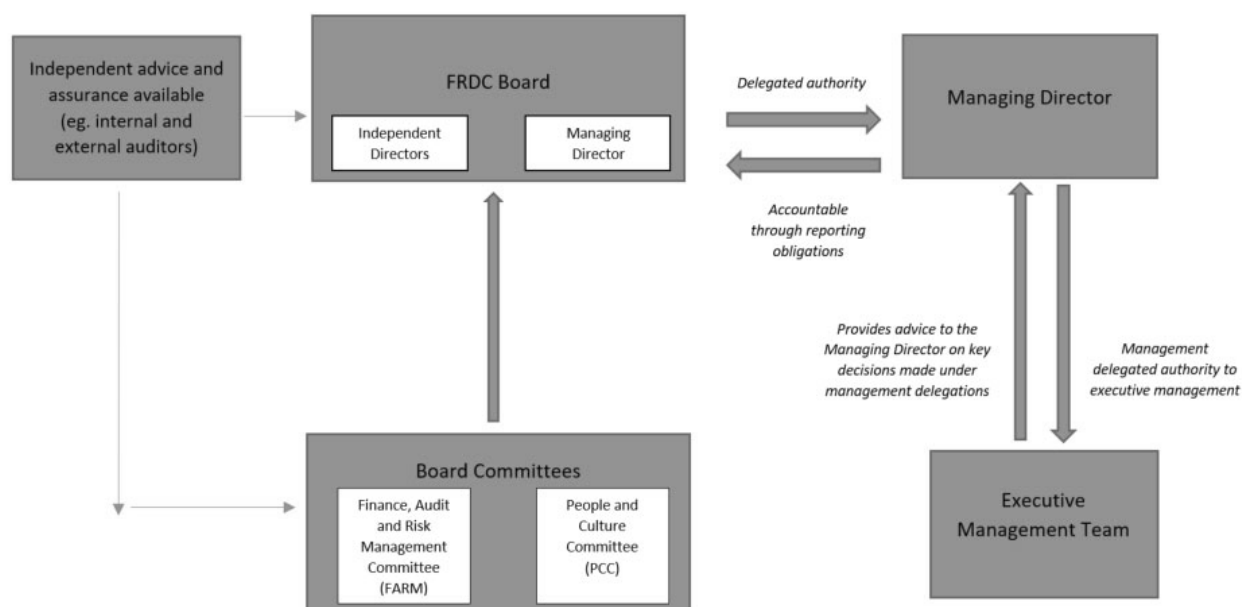
8. OBJECTIVES

The objective of FRDC's risk management policy is to ensure the implementation of an effective risk management framework that is consistent with FRDC achieving the objectives of the PGPA Act.

FRDC is committed to ensuring that effective risk management remains central to all its activities, and is a core management competency. The aim is to ensure that risk management is embedded in FRDC's processes and culture, thus contributing to the achievement of its objectives.

ROLES AND RESPONSIBILITIES FOR RISK MANAGEMENT

Structure of FRDC board and standing board committees



| Role | Key responsibilities |
|---|---|
| FRDC board | <ul style="list-style-type: none"> ensuring that strategies are in place for achieving the FRDC outcome satisfying itself that the FRDC is achieving its outcome ensuring that the FRDC has appropriate risk management and regulatory compliance policies in place, and that they are adhered to setting the FRDC's risk appetite and risk tolerance against agreed risk categories monitoring the risk framework identifying emerging risks monitoring the FRDC's risk mitigation strategies to ensure that all high and very high risks and those outside of the board's tolerance levels are managed |
| Finance, Audit and Risk Management (FARM) Committee | <ul style="list-style-type: none"> reviewing the risk framework annually reviewing emerging risks reviewing and assessing the risk register and mitigation strategies reporting its deliberations to the board |
| Managing Director | <ul style="list-style-type: none"> leading the development and implementation of the framework identifying the enterprise-wide risks, and developing mitigation strategies alerting and reporting any material changes in risk to the board implementation of mitigation strategies and controls |

| | |
|-----------------------------------|--|
| Managing Directors direct reports | <ul style="list-style-type: none"> • monitoring, alerting and reporting any material changes in risk to the Managing Director • implementation of mitigation strategies and controls |
|-----------------------------------|--|

9. POLICY STATEMENT

The FRDC will:

- adopt the Commonwealth Risk Management Policy as a matter of better practice
- embed risk management analysis and assessment in its culture, so that a shared understanding of risk leads to well informed decision-making, and that risk management is incorporated in all its activities
- incorporate both threats and opportunities in its treatment of risk
- consider risk in the FRDC's corporate planning processes and procedures
- tailor its approach to mitigate/respond to identified risks based on appetite and tolerance
- maintain a register of indemnities issued
- commit to appropriate annual risk training for its staff members and relevant contractors.

The board will set and monitor the FRDC'S risk tolerances and appetites (refer 10.2 below), with a focus on high and very high risks.

9.1 Risk management framework

FRDC's risk management framework endeavours to cover the full spectrum of risks faced by FRDC. This involves the following steps:

- **identifying** and **analysing** the main risks facing FRDC
- **evaluating** those risks and making judgements about whether they are acceptable or not
- **implementing** appropriately designed control systems to manage these risks in a way which is consistent with FRDC's risk appetite statement
- **treating** unacceptable risks by formulating responses following the identification of unacceptable risks, including actions to reduce the probability or consequences of an event and formulation of contingency plans
- **documenting** these processes, with summary tables (risk register) the main forms of documentation, supplemented by the risk management procedure, Fraud control plan procedure, Quality management system (QMS) or related documents as appropriate
- Ongoing **monitoring, communication** and **review**

9.2 Risk appetite and tolerance

Risk appetite refers to the amount of risk an entity is willing to accept or retain to meet its purpose, goals or objectives. It is a statement or series of statements that describes the entity's attitude toward risk taking. Risk tolerance refers to the levels of risk taking that are acceptable in order to achieve a specific objective or manage a category of risk.

The FRDC faces a range of risks reflecting its responsibilities as a Research, Development and Extension Corporation. These include risks in our business areas Programs, Communications and Corporate support, and potentially Marketing.

We recognise that it is not possible, or necessarily desirable, to eliminate all of the risks inherent in our work. Accepting some degree of risk in our business practices promotes efficiency and innovation.

However, in other areas, for example the safety of our staff, our risk appetite (the level of risk we are willing to accept) is very low.

The FRDC's risk appetite statement and associated tolerance by risk category as it relates to threats and opportunities is as follows:

| Category | Sub Category |
|---|--|
| Strategic | ➤ Level of stakeholder support |
| Reputational | ➤ Stakeholder feedback |
| Financial | ➤ Long term financial sustainability ➤ Fraud |
| Service Delivery (RD&E, Marketing, Trade) | ➤ Stakeholder expectations ➤ Environmental contraventions ➤ Integrity of science |
| Operational | ➤ Internal services |
| People | ➤ Employee safety and welfare ➤ Workforce management, planning and performance. |
| Governance | ➤ Policy, Legal and legislative requirements |

Threats

Strategic

| Strategic – Level of stakeholder support | | | |
|--|------------------|--|-------------------|
| <u>Appetite statement:</u> FRDC has a medium appetite for strategic risks. | | | |
| <u>Level of control:</u> Low | | | |
| <u>Comment:</u> FRDC ensures a continued focus on effective engagement and communication with all stakeholders by maintaining regular contact ensuring the FRDC is able to identify or aware of key issues. FRDC engages in opportunities to build upon and maintain relationships, and is committed to treating all stakeholders courteously and professionally, providing high quality service. | | | |
| Key risk indicator | | Tolerance trigger | Metric owner |
| Metric | Timeframe | | |
| Level of support from the Minister | May and November | More than 1 instance of non-support | Board |
| | | 1 instance of non-support | Managing Director |
| Level of support from Representative Organisations | August and April | More than 2 instance of non-support | Board |
| | | Up to and including 2 instances of non-support | Managing Director |

Reputational

| Reputational – Stakeholder feedback | | | |
|--|------------------|----------------------------------|-------------------|
| <p><u>Appetite statement:</u> FRDC has a medium appetite for risks or activities that could have a significant negative impact on its reputation.</p> <p><u>Level of control:</u> Medium</p> <p><u>Explanation:</u> FRDC upholds its reputation for professionalism recognising that whilst its interests may not always align with others, it robustly engages with respect and courtesy, while maintaining the integrity of its relationships.</p> | | | |
| Key risk indicator | | Tolerance trigger | Metric owner |
| Metric | Timeframe | | |
| Significant criticisms or complaints | January and July | More than 5 | Board |
| | | Up to and including 5 | Managing Director |
| Negative survey results | January | More than 10% change | Board |
| | | Less than or equal to 10% change | Managing Director |

Financial

| Financial – Long term financial sustainability | | | |
|--|-----------------------|---|-------------------|
| <p><u>Appetite statement:</u> FRDC has a very low appetite for decisions that have a significant negative impact on FRDC's long term financial sustainability.</p> <p><u>Level of control:</u> Medium</p> <p><u>Explanation:</u> FRDC maintains a financially sustainable position by ensuring the FRDC is actively, pursuing, planning and resourcing activities to grow and diversify its ability to invest in RD&E.</p> | | | |
| Key risk indicator | | Tolerance trigger | Metric owner |
| Metric | Timeframe | | |
| Variation in revenue (forecast) | April and November | Year on year revenue reduction of more than 10% | Board |
| | | Year on year revenue reduction of up to 10% | Managing Director |
| Variation in retained earnings | At each board meeting | Retained earnings fall below \$5m | Board |
| | | Retained earnings fall below \$15m | Managing Director |

| Financial - fraud | | | |
|--|--|--|--|
| <p><u>Appetite statement:</u> FRDC has low appetite for fraud, collusion, and theft (and the associated reputational risk).</p> <p><u>Level of control:</u> High</p> | | | |

Explanation:

FRDC recognises the risk of fraud and/or corruption exists within its routine activities. FRDC takes all reasonable steps to identify vulnerabilities; and to prevent, detect, and punish fraud.

| Key risk indicator | | Tolerance trigger | Metric owner |
|------------------------------|-----------|------------------------|--------------|
| Metric | Timeframe | | |
| Number of incidents of fraud | Annual | All instances of fraud | Board |

Service Delivery (RD&E, Marketing, Trade)**Service Delivery:**

- Stakeholder expectations
- Environmental contraventions
- Integrity of Science

Appetite statement:

- FRDC has a medium appetite for risks arising from failure to meet stakeholder commitments or expectations.
- FRDC has a low appetite for risks that could lead to a contravention of *The Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).
- FRDC has a low appetite for risks that discredit FRDC public science.

Level of control: Medium

Explanation:

FRDC aims to take a risk based approach to its investment to deliver a balanced portfolio with a mix of low and high risk investments. The FRDC aims to add value and cover a broader range of RD&E approaches, including service delivery and extension, maximising leverage opportunities and adding to the creation of value. FRDC aims to ensure its services are easy to use, efficient, accessible and suitable for all stakeholder needs. FRDC aims to improve service delivery by examining opportunities for innovation.

| Key risk indicator | | Tolerance trigger | Metric owner |
|--|---------------------|-----------------------|-------------------|
| Metric | Timeframe | | |
| Stakeholders about FRDC | January | More than 3 | Board |
| | | Up to and including 3 | Managing Director |
| Contraventions of the (EPBC Act) caused by FRDC research | January | More than 1 | Board |
| | | 1 instance | Managing Director |
| Attacks on FRDC funded research | February and August | More than 2 | Board |
| | | Up to and including 2 | Managing Director |

Operational**Operational: internal services****Appetite statement:**

- FRDC has a medium appetite for failure to deliver agreed tasks on time.
- FRDC has a low appetite for system failures, or information and data security breaches

Level of control: High

Explanation:

FRDC aims to ensure its internal services are easy to use, efficient, accessible and suitable for all employee needs. FRDC aims to improve internal service delivery by examining opportunities for innovation.

| Key risk indicator | | Tolerance trigger | Metric owner |
|--|---------------------|-------------------------|-------------------|
| Metric | Timeframe | | |
| Continual Improvement Reports (CIR) not delivered within 60 days | April and September | More than 10% | Board |
| | | Up to and including 10% | Managing Director |

People**People**

- Employee safety and welfare
- Workforce management, planning, and performance

Appetite statement:

- FRDC has a low appetite for compromising employee safety and welfare
- FRDC has a low appetite for risks arising from inadequately trained employees or failed internal processes

Level of control: High

Explanation:

FRDC aims to attract, retain, and forward plan for a capable, adaptive, responsive and engaged workforce. FRDC values a healthy workplace culture that supports staff members to perform at their best, and ensure the long-term sustainability of critical skill sets. The FRDC's goal is to identify risks to health and safety and minimise those risks as far as reasonably practicable.

| Key risk indicator | | Tolerance trigger | Metric owner |
|---|---------------------|---------------------------------------|-------------------|
| Metric | Timeframe | | |
| WHS incidents | Every board meeting | More than 2 incidents | Board |
| | | Up to and including 2 incidents | Managing Director |
| Training plans undertaken and completed | May | More than 10% not completed | Board |
| | | Up to and including 10% not completed | Managing Director |
| Median number of days lost per staff member | December | More than 10 | Board |
| | | Up to and including 10 | Managing Director |

Governance**Governance – Policy, legal and legislative requirements****Appetite statement:**

FRDC has a low appetite for non-compliance with legal and legislative requirements.

Level of control: High

Explanation:

FRDC adheres to the relevant laws and regulations, including FRDC policies and procedures and ensures that appropriate governance is in place by monitoring and supervising systems that deliver the targeted outcomes for the organisation; and ensures accountability to stakeholders and legal compliance.

| Key risk indicator | | Tolerance trigger | Metric owner |
|-----------------------------------|-----------|-------------------|-------------------|
| Metric | Timeframe | | |
| Unsatisfactory compliance reports | August | More than 1 | Board |
| | | Up to 1 | Managing Director |

Opportunities

Strategic

| Strategic – Level of stakeholder support | | | |
|---|-----------|--------------------------------|-------------------|
| <p><u>Appetite statement:</u> The FRDC has a high appetite for activities that improve its reputation.</p> <p><u>Level of control:</u> Medium</p> <p><u>Explanation:</u> FRDC ensures a continued focus on effective engagement and communication with stakeholders by maintaining regular contact, and ensuring the FRDC is across key issues. FRDC engages in opportunities to build upon and maintain relationships, and is committed to treating stakeholders professionally, and providing them with a high quality service.</p> | | | |
| Key risk indicator | | Tolerance trigger | Metric owner |
| Metric | Timeframe | | |
| Increase in positive survey results | 12 months | More than 10% change | Board |
| | | Up to and including 10% change | Managing Director |

Financial

| Financial – Long term financial sustainability | | | |
|--|--------------------|------------------------|-------------------|
| <p><u>Appetite statement:</u> FRDC has a high appetite for increasing and diversifying its income.</p> <p><u>Level of control:</u> High</p> <p><u>Explanation:</u> FRDC maintains a financially sustainable position by ensuring the FRDC is actively, pursuing, planning and resourcing activities and opportunities to grow and diversify its ability to invest in RD&E.</p> | | | |
| Key risk indicator | | Tolerance trigger | Metric owner |
| Metric | Timeframe | | |
| Income increase | April and November | More than 3% | Board |
| | | Up to and including 3% | Managing Director |

Service Delivery (RD&E, Marketing, Trade)

| Service Delivery – Stakeholder expectations | | | |
|---|-----------|-------------------------|-------------------|
| <p><u>Appetite statement:</u> FRDC has a high appetite for investment in research that improves stakeholder perception of the FRDC's ability to deliver to stakeholder expectations.</p> <p><u>Level of control:</u> High</p> <p><u>Explanation:</u> The FRDC aims to add value and cover a broader range of RD&E approaches including service delivery and extension, maximising leverage opportunities and adding to the creation of value.</p> | | | |
| Key risk indicator | | Tolerance trigger | Metric owner |
| Metric | Timeframe | | |
| Stakeholder satisfaction | January | Greater than 10% | Board |
| | | Up to and including 10% | Managing Director |

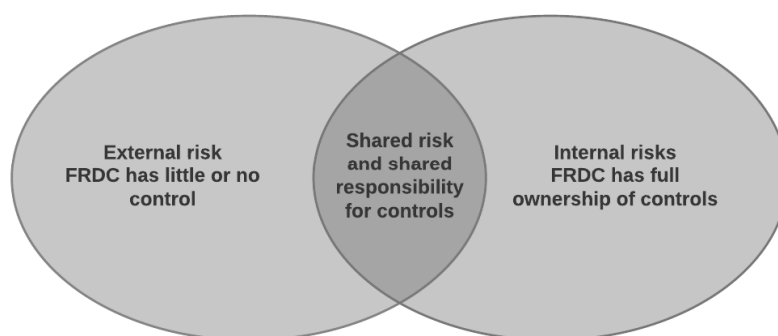
Operational

| Operational – internal services | | | |
|---|-----------|-------------------|-------------------|
| <p><u>Appetite statement:</u> FRDC has a high appetite for improving internal services delivery and efficiency</p> <p><u>Level of control:</u> High</p> <p><u>Explanation</u> FRDC aims to ensure its services are easy to use, efficient, accessible and suitable to all stakeholder needs. FRDC aims to improve service delivery by innovating.</p> | | | |
| Key risk indicator | | Tolerance trigger | Metric owner |
| Metric | Timeframe | | |
| Activities satisfactorily completed on time | August | Greater than 80% | Managing Director |

Shared risk

Shared risk is a risk with no single owner, where more than one entity is exposed to or can significantly influence the risk. FRDC manages shared risks by:

- identifying shared risks during the risk assessment process
- establishing effective controls - examples of controls for shared risks include contracts, Memorandums of Understanding, insurance, increased reporting and monitoring, and consulting and working in partnership with stakeholders.



9.3 Fraud

The FRDC will apply the Commonwealth's Fraud Control Framework as a matter of best practice. The FRDC will aim to minimise the likelihood and impact of fraud by implementing policy that is consistent with the requirements of the *Commonwealth Fraud Control Framework*.

Employees are responsible for managing the risk of fraud within the scope of their activities by integrating fraud control into everyday business management practices. Employees will develop an understanding of their roles and responsibilities with respect to fraud control, and how they can contribute to preventing fraud in their respective areas.

The FRDC will foster the highest standards of ethical behaviour and aims to mitigate the risk of fraud through the elements of the FRDC's financial, management and operating systems; namely:

1. Policy generally; but specifically:
 - a. Code of conduct
 - b. Risk policy
 - c. Risk register
 - d. Delegations policy
 - e. Employee policy
2. Quality Management System (QMS) - policies, procedures, work guides and training
3. Audit programs:
 - a. FRDC project audit program of research providers
 - b. QMS internal and external audit program
 - c. Financial internal audit program

4. Separation of function; with payment processing ensuring four to five staff are involved in the process.
5. FRDC project agreement [it contains detail on how research providers should report suspicions or allegations of fraud]
6. *Public interest disclosure policy* promoting integrity and accountability, encouraging and facilitating the disclosure of suspected wrongdoing and reporting processes
7. The FRDC will foster the highest standards with access to expertise in Fraud/Control Prevention/Detection
8. Recruitment processes defining and communicating the FRDC's culture, values and its practices. **Note.** The employee performance management process requires an assessment of individual employee performance against risks

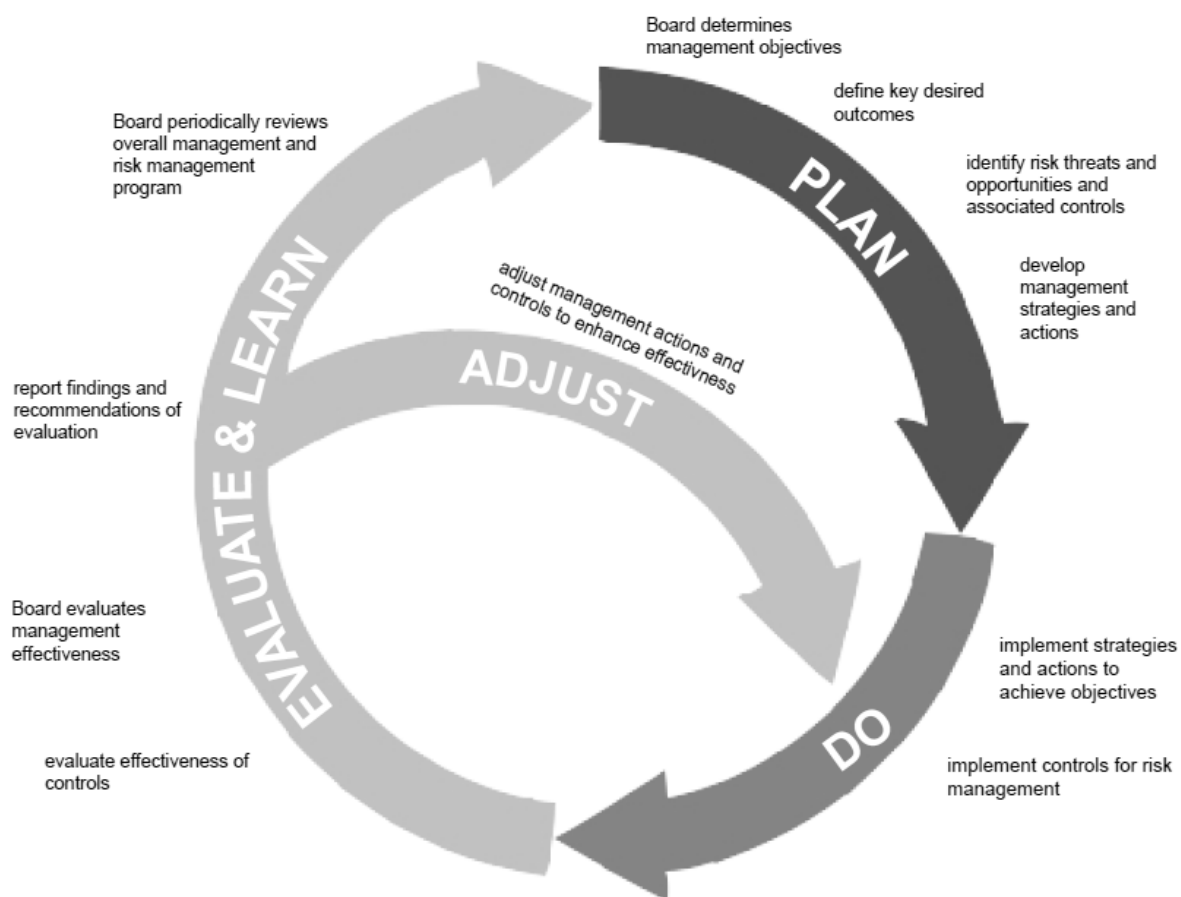
9.4 Measures of success

Measures of success for this policy will be that:

1. the board:
 - a) sets and monitors risk appetite and tolerance aligned with the RD&E plan
 - b) has a FARM committee charged with monitoring and reviewing the risk framework annually
 - c) considers identified emerging risks, significant changes to existing risks and significant impacts to mitigation strategies at each meeting
 - d) ensures that the risk management framework is updated annually
2. all policies and procedures incorporate a risk evaluation
3. no instances of fraud
4. risk training is provided for employees and relevant contractors
5. risks and emerging risks are discussed at every staff and management meetings
6. achieving an advanced risk maturity level as per the Comcover Benchmarking Survey, assessing the maturity of the FRDC risk framework against the nine elements of the Commonwealth Risk Management Policy.
7. demonstrated effective controls have been implemented across all risk categories (audited both internally and externally)

9.5 Monitoring and reporting

FRDC will use key risk indicators and tolerance limits to assist in identifying how actual exposure sits against the different tolerance levels above. FRDC will use an adaptive management cycle to ensure ongoing monitoring and review of FRDC risk environment.



Adequacy of controls for existing and new risks will be monitored through internal and external audits; and implementing (where appropriate) their recommendations including (but not limited to):

- QMS
- Financial statements
- Project commitments
- Remuneration
- Fraud
- ICT

Any issues or material changes will be identified in weekly Managing Director reports and significant issues, including risks which exceed tolerance levels, will be escalated to the Board through the FARM committee.

Actions to be taken, including any additional controls, will be allocated as per the risk reporting and escalation table in the risk management procedure.

FRDC will report on risk management activities in its annual report.

Risk Evaluation Tables

| Risk reporting and escalation (threat) | | | |
|--|--|---|---|
| Residual Risk evaluation | Responsibility and oversight of management of risk | Action | Frequency of reports |
| Active Management | Board | very high risk, should be brought to the immediate attention of the board, Managing Director to remedy and continuously monitor | Weekly – via MD report and at every board meeting |
| Control focus | Managing Director | high risk, requires FRDC management attention and should be continuously monitored and remain effective | At every board meeting |
| Periodic review | Managing Directors direct reports | medium risk, performance monitored regularly and ensure risk does not change | Monthly at FRDC management meetings |
| No major concern | Managing Directors direct reports | low risk, apply routine procedures and monitor at supervisory level | At least annually |

| Risk reporting and escalation (opportunity) | | | |
|---|--|---|-------------------------------------|
| Residual Risk evaluation | Responsibility and oversight of management of risk | Action | Frequency of reports |
| Active Management | Board | very high opportunity; detailed planning required at senior levels to prepare for and capture the opportunity | At every board meeting |
| Control focus | Managing Director | high opportunity; senior executive management attention needed and management responsibility specified | At every board meeting |
| Periodic review | Managing Directors direct reports | medium opportunity; manage by specific monitoring or response procedures | Monthly at FRDC management meetings |
| No major concern | Managing Directors direct reports | low opportunity; manage by routine procedures, unlikely to need specific application of resources | At least annually |

10. ATTACHMENTS

| # | Description |
|---|----------------|
| 1 | Not applicable |