Governance and Risk Policy

Commitment

Illowra is committed to providing and maintaining quality Specialist Disability Accommodation (SDA), and this policy outlines how we manage governance and risk. All our policies and procedures support quality services and continuous improvement, part of governance and risk management in compliance with legislation and standards.

Scope

This policy relates to all staff to ensure services are well managed and well governed, and promote a culture of compliance and continuous improvement.

What is governance and how do we govern?

Good governance is about the processes for making and implementing decisions. It's not about making 'correct' decisions, but about the best possible process for making those decisions.

Good governance:
- maximises quality, safety and efficiency
- minimises complaints, litigation, poor publicity and negative outcomes
- manages risks
- identifies and addresses non-compliance in a timely manner.

We ensure good governance by:
- having clear and transparent policies and procedures
- maintaining compliance with legislation and standards
- working efficiently and effectively
- engaging stakeholders in an equitable and inclusive approach
- being responsive to change and opportunities for improvement
- using clear decision making processes
- being accountable for the consequences of decisions
- seeking legal or financial advice as required.

We operate in the context of the NDIS Provider Toolkit and SDA requirements, as well as the Victorian Service Agreement Information Kit. It is noted in the move to full scheme rollout requirements can change, and these resources should be reviewed in the context of governance, risk and compliance.

What is compliance and how do we manage it?
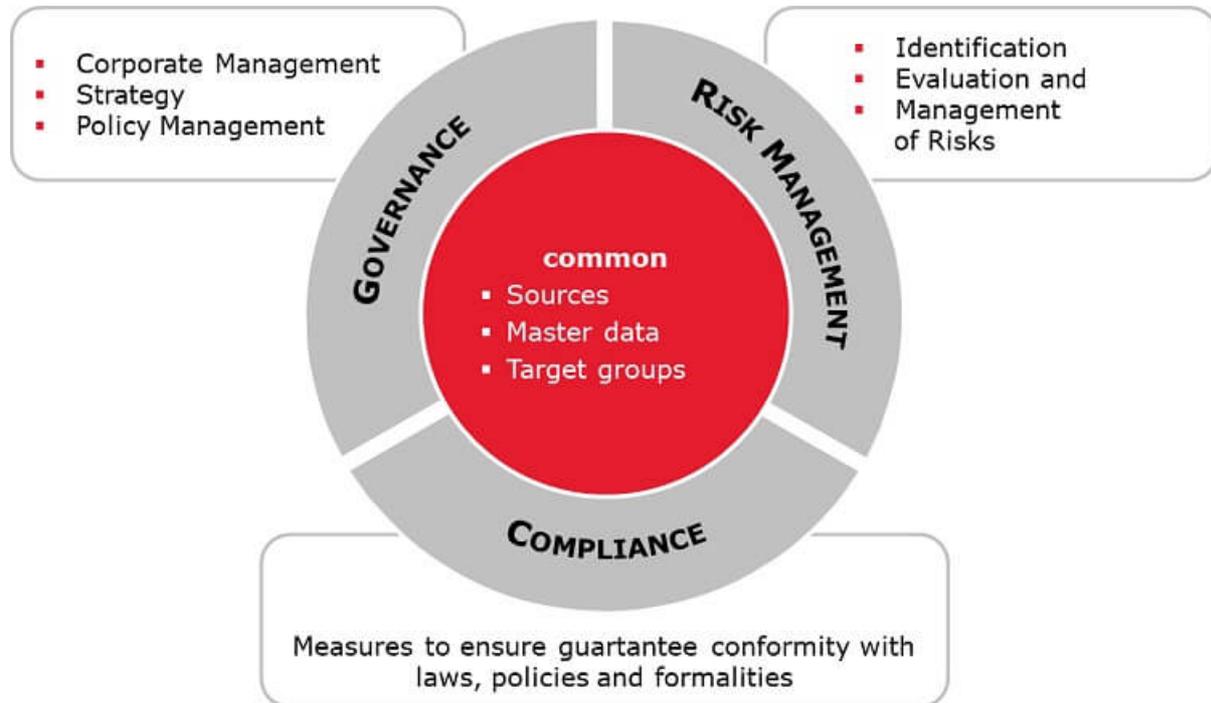
Compliance is action in line with requirements of legislation, policy, standards, codes and contracts. We have a comprehensive policy framework to ensure relevant compliance. We maintain awareness of current compliance requirements through membership of relevant peak bodies and contractual legal advice. An open culture of best practice and continuous improvement is promoted to ensure non-compliant issues are identified and responded to in a proactive, transparent and systematic manner.

What is risk and how do we manage it?

Risk is a hazard or exposure to the chance of danger, injury or loss. Risk management is the identification, assessment, and prioritisation of risks, followed by a coordinated response to minimise, monitor, and control their probability and/or impact.

Risk management is everyone's responsibility. To ensure that high or extreme risks are managed at an appropriate level there is a flow of responsibility and escalation.

The Managing Director:
• leads a culture of good governance, compliance and risk management
• responds to escalated significant issues or concerns.

The Finance and Governance Manager:

- provides policy oversight
- ensures compliance
- reviews risk management
- responds to escalated issues
- escalates to the Managing Director if there is a significant issue or concern.

Staff and contractors:

- comply with risk management policies and procedures
- escalate if there is an issue or concern.

A risk assessment should occur prior to the introduction of a new service, new practice, new equipment or a change to the working environment. Risk can change as circumstances change, and ongoing risk monitoring is required. The risk matrix is used to determine the estimated level/severity of risk, given the current circumstances. The matrix assesses the Likelihood and the Consequence. The allocation of a risk rating is not an exact science and therefore should involve a number of people in making this decision.

CONSEQUENCE	LIKELIHOOD				
	1. Rare The event may occur but only in exceptional circumstances. No past event history.	2. Unlikely The event could occur in some circumstances. No past event history.	3. Possible The event may occur sometime. Some past warning signs or previous event history.	4. Likely The event will probably occur. Some recurring past event history.	5. Almost Certain The event is expected to occur in normal circumstances. There has been frequent past history.
1. Insignificant	Green	Green	Green	Green	Yellow
2. Minor	Green	Green	Green	Yellow	Orange
3. Moderate	Green	Green	Yellow	Orange	Red
4. Major	Green	Yellow	Orange	Red	Red
5. Catastrophic	Yellow	Orange	Red	Red	Red

Key		
	Low Risk	Manage and monitor with normal operational management practices
	Medium Risk	Risks should be managed and monitored regularly
	High Risk	Must have considerable management to reduce to as low as reasonably practicable
	Extreme Risk	Must be given immediate senior management attention

Insurance and indemnity

Insurance is part of a risk management approach. We maintain appropriate insurance for the business, staff and assets.

Conflict of Interest

Any potential conflicts of interest will be declared and documented. The Managing Director has responsibility to ensure any conflict of interests is managed appropriately in line with compliance requirements.

Supported Independent Living (SIL) Providers

Illowra will not enter into any agreement with a SIL provider that would limit the choice and control of participants to choose their own SIL provider.

Maintaining governance and risk information

The Finance and Governance Manager will develop and maintain appropriate documentation for systematic and compliant record keeping.

Responsibilities

- The Managing Director is responsible to ensure the business is managed in line with good governance and risk management requirements
- The Managing Director is responsible for ensuring staff and organisational contractors understand and meet their obligations
- The Managing Director is responsible for endorsing agreements with supported independent living providers and ensuring obligations are met
- The Managing Director is responsible for signing contracts with investors and ensuring obligations are met
- The Finance and Governance Manager is responsible for ensuring organisational compliance and addressing any non-compliance identified
- The Finance and Governance Manager is responsible for governance and risk management record keeping systems
- The Maintenance Manager is responsible for ensuring maintenance is compliant with policy and contractors understand their obligations
- All staff are responsible for following policy and procedure
- All stakeholders are responsible for reporting any non-compliance identified

Governance and Risk Policy questions and feedback

If you would like a copy of this policy, or if you have any questions or feedback, please contact us at info@illowraliving.com.au or **1300 455 697 (1300 illowra).**

Legislation, Standards and Agreements

The following legislation applies to this policy and supporting documentation:

Disability Act 2006 – (Vic)
National Disability Insurance Scheme Act 2013 (Cth)

The following Standards apply to this policy and supporting documentation:

National Standards for Disability Services (DSS) – 2013
NDIS Provider Toolkit and SDA requirements
Service Agreement Information Kit

The following resources are useful to this policy and supporting documentation:

VMIA Risk Management for Community Services Organisations [https://www.vmia.vic.gov.au/](https://www.vmia.vic.gov.au/risk/victorian-government-risk-management-framework) [risk/victorian-government-risk-management-framework](https://www.vmia.vic.gov.au/risk/victorian-government-risk-management-framework)

Related internal documents

Engagement Policies

Governance and Management Policies

Safety Policies

Staff Policies

Code of Conduct

Governance and Risk Policy	Policy Matrix: Governance and management
Version	**Details**
Version 3	10 February 2019
Version 4	21 May 2019
Endorsed	Managing Director
Changes	Included legislative compliance and conflict of interest clauses.