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1 February 2021

Ms Andrea Selvey
Chief Executive Officer
Shire of Cocos Keeling Islands
PO Box 1094
Cocos (Keeling) Islands
INDIAN OCEAN WA 6799

By email: ceo@cocos.wa.gov.au

Dear Andrea

SHIRE OF COCOS (KEELING) ISLANDS POLICY MANUAL REVIEW 2021

We refer to your email dated 24 December 2020 with instructions to review the Policy Manual of the Shire of Cocos (Keeling) Islands (**the Shire**).

Details of our final review are provided below. Please find **attached** the Shire of Cocos (Keeling) Islands Policy Manual (**the Policy Manual**) with tracked changes and in line with the commentary below.

Scope

Civic Legal has completed a review of the Policy Manual in accordance with the agreed scope as follows:

- review existing policies to ensure that they are consistent internally and with each other, compliant with or align with relevant legislation and professionally worded;
- identify gaps within the policy manual and make recommendations for policies that the Shire should consider adopting; and
- deliver draft policies for any new policies that we recommend the Shire adopt.

It is outside the scope of this review to make stylistic changes or sub-editing ones (e.g. correcting grammar or linguistic usage). However, some amendments have been made to improve the clarity of some sentences.

It is also outside the scope of this review to provide legal advice. The review has nevertheless been subject to vetting by a lawyer, to ensure the policies are aligned with applicable legislation. We have identified where we believe legal advice may be beneficial to the Shire in the table below.

Where we have made changes to the Policy Manual, we have done so in tracked changes.



General Comments

In the list below, there are some general comments/recommendations for the Shire to consider, which apply to several (or all) of the policies. We have not made amendments to the Policy Manual in line with these general comments/recommendations. This would have been beyond the scope of the review, or would have required input from the Shire.

Civic Legal **recommends** that the Shire:

- Use consistent formatting when referring to legislation. For example, *Title of Act Year* (Jurisdiction). All legislation that is applicable to the Cocos Keeling Islands should include (CKI) to make clear its special status in terms of jurisdiction. **Actioned**
- Use consistent terminology when referring to the Shire of Cocos (Keeling) Islands. If you choose to refer to the Shire of Cocos (Keeling) Islands in short hand (e.g. the Shire) you may also consider using a consistent definition. E.g. The Shire – The Shire of Cocos (Keeling) Islands. **Actioned**
- Use consistent terminology when referring to the Chief Executive Officer of the Shire of Cocos (Keeling) Islands. If you choose to refer to the Chief Executive Officer in short hand (e.g. the CEO) you may also consider using a consistent definition. E.g. CEO – the Chief Executive Officer of the Shire of Cocos (Keeling) Islands. **Actioned**
- Uses consistent terminology when referring to councillors/elected members. You may also consider using a consistent definition for the selected terminology. **Actioned**
- Use a consistent policy template and headings for all policies. **Actioned**
- Cites legislation in a consistent manner. Currently some policies use pinpoint references (e.g. refers to specific sections) while others refer to entire Acts. We recommend using pinpoint references where possible. **Actioned**
- Ensures the 'Relevant Delegations' box is appropriately completed for all policy documents. Currently, various 'Relevant Delegations' boxes have been left blank and no delegations have been referred to in any policies. **Noted in briefing for action**
- Includes a 'related documents' section in the policy template. Related documents including policies, procedural documents and legal advice could be listed under this heading for ease of reference (for the time being, these documents have been included in the 'relevant legislation/local law' section). This heading has already been included in CPR6. **Actioned**
- Removes policies relating to operational issues from the Policy Manual and keep them in a 'CEO Directions Manual' (or a manual to that effect). This could include CPA7 - Drug & Alcohol Policy, CPA8 - Office Dress Standards Policy, CPE3 - Fitness for Work Policy, CPE4 - Internet and Email Usage Policy and CPE5 - Shire Employees Undertaking Secondary Employment Policy. **To be actioned in a future review**

- Removes policies relating to the council/Shire as a trustee from the Policy Manual and keep them in a 'Trustee Policy Manual' (or a manual to that effect). This could include CPC6 - Home Island Housing Policy and potentially CPF3 - Investment Policy. *These policies have been identified and a sentence added at the beginning of the policy notifying that it as a Trustee policy.*
- Avoids inserting extracts of legislation in policy documents, where possible. *To be actioned in a future review*

The Shire should also note that a number of policies currently make reference to the *Occupational Safety and Health Act 1984* (WA) (CKI). At the time of this review, these references are still applicable. However, the *Work Health and Safety Act 2020* (WA) is expected to come into operation this year and contains severe penalties when breached. We recommend that the Shire obtain legal advice in relation to the effects of the new *Work Health and Safety Act 2020* (WA) on the Shire's policies and procedures to ensure that liability risk is appropriately mitigated. *To be actioned*

Suggested Amendments

The table below identifies significant amendments that have been made to the Policy Manual (in tracked changes) as well as further recommendations for the Shire to consider.

We have not made amendments to the Policy Manual in line with the comments in the "Further Considerations" column. This would have been beyond the scope of the review, or would have required input from the Shire.

Amendments that are not considered to be significant (e.g. minor grammatical edits) may not be specifically mentioned in the table below but have been captured in tracked changes in the Policy Manual.

| Policy | Amendments | Further Considerations |
|--|---|--|
| Administrative | | |
| CPA1 - Approval of leave for Chief Executive Officer and Acting Chief Executive Officer | <ul style="list-style-type: none"> Updated officer title (Governance and Risk Coordinator) As per Shire request (email dated 13 January 2021): Included the requirement to source a relief CEO externally when key staff are incapacitated | |
| CPA2 - After Hours Use of Shire Vehicles Policy | <ul style="list-style-type: none"> Amended to include all any offence(s) under the <i>Road Traffic Act 1974</i> (WA) (CKI). Included the <i>Road Traffic Act 1974</i> (WA) (CKI) in the 'relevant legislation/local law' section. | |
| CPA4 - Communications and Social Media Policy | <ul style="list-style-type: none"> Removed references to irrelevant national standards. Removed reference to Queensland legislation (CEO definition). Replaced definition of 'CEO'. The <i>Local Government Act 1995</i> (WA) (CKI) and the <i>Local Government (Rules of Conduct) Regulations 2007</i> (WA) (CKI) have been included in the 'relevant legislation/local law' section. Minor amendments made to improve clarity of sentences. | |
| CPA5 - Dealing with Family Members Policy | <ul style="list-style-type: none"> Corrected the title of the <i>Equal Opportunity Act 1984</i> (WA) (CKI). Included the <i>Family Court Act 1997</i> (WA) (CKI) in the 'relevant legislation/local law' section. Amended the 'scope' to include councillors, as councillors are discussed in this policy. | <ul style="list-style-type: none"> The policy refers to section 6 of the <i>Family Court Act 1997</i> (WA) when defining 'family member'. However the definition provided is not in line with the <i>Family Court Act 1997</i> (WA) definition and should therefore be amended. The Shire should revise the use of the <i>Family Court Act 1997</i> (WA) definition of 'family member'. This may not be the most appropriate definition within this context. The Shire may wish to seek legal advice in relation to identifying the most appropriate legal definition. <p>Actioned</p> |

| Policy | Amendments | Further Considerations |
|--|---|--|
| CPA6 - Designated Senior Employees Policy | | |
| CPA7 - Drug & Alcohol Policy | <ul style="list-style-type: none"> Amended the 'objective' to ensure it identifies the desired outcome in relation to the policy's subject (drugs and alcohol). Drafted a basic 'scope'. This 'scope' is based on the 'objective'. Removed reference to Queensland legislation (CEO definition). Replace definition of 'CEO'. Amended the 'policy' to ensure 'the Shire' was referred to rather than 'the Council' when referring to the organisation of the Shire. | <ul style="list-style-type: none"> The policy makes reference to internal procedural documents (e.g. the Drug and Alcohol Procedure, Discipline Procedure), which seem to be necessary in understanding the relevant considerations and authorised actions of particular staff members. These documents should be identified under a 'Related Documents' section (e.g. see CPR6). Relevant codes of conduct, etc. should also be listed where applicable. We have assumed that the information which appears to be missing from this policy has been captured in the relevant procedural documents. |
| CPA8 - Office Dress Standards Policy | <ul style="list-style-type: none"> Referenced CPR2 in the 'scope' section (referred to personal protective equipment) and in the 'relevant legislation/local law' section. | |
| CPA9 - Public Communications Policy | | |
| CPA10 - Recognition of Service and Retirement Policy | | |
| CPA11 - Legal Representation for Council Members and Employees Policy | <ul style="list-style-type: none"> Replaced 'Director Corporate Service under' under 6.3 with 'Deputy Chief Executive Officer' (as specified in 6.2). Updated the definition of 'approved lawyer' to refer to the <i>Legal Profession Act 2008 (WA)</i> as the <i>Legal Practice Act 2003 (WA)</i> has been repealed. The 'relevant legislation/local law' section has also been updated accordingly. | <ul style="list-style-type: none"> We note that the 'approved lawyer' definition refers to the Shire's Legal Panel. If the Shire does not have a formal legal panel, this should be deleted. Actioned |

| Policy | Amendments | Further Considerations |
|---|--|---|
| CPA12 - New Councillor Training and Continuing Professional Development Policy | | <ul style="list-style-type: none"> The Shire should consider defining the criteria which will be used to assess applications for conference attendance or other professional development, in the policy. Not to be actioned |
| CPA13 - Use of Council Chambers Policy | <ul style="list-style-type: none"> Drafted a basic 'scope'. | <ul style="list-style-type: none"> We note that this policy refers to 'Executive Managers' rather than 'Senior Employees'. If these terms are interchangeable, 'Executive Managers' could be updated to 'Senior Employees'. No amendments are required if the terms are not interchangeable. Actioned |
| CPA14 - e-Meetings Policy | <ul style="list-style-type: none"> Amended the title so it is specific to when the policy is applicable. Relocated text from the 'scope' section to the 'policy' section as this text was more applicable under the 'policy' section. Amended the 'policy' to identify the legislative authority to suspend local laws is found under the <i>Local Government Act 1995</i> (WA) (CKI) (section 10.4) rather than the <i>Local Government (Administration) Regulation 1995</i> (WA) (CKI). Included the <i>Local Government Act 1995</i> (WA) (CKI) and the <i>Shire of Cocos (Keeling) Islands Meeting Procedures Local Law 2019</i> under 'relevant legislation/local law'. | <ul style="list-style-type: none"> We note that the Shire's Meeting Procedure Local Law specifies that a simple majority is required to suspend the operation of specified clauses of the <i>Meeting Procedures Local Law</i> (cl.16.1). However, the <i>Local Government Act</i> requires an absolute majority to be reached in order to suspend local laws. Cl.16.1 of the Shire's <i>Meeting Procedure Local Law</i> may therefore be invalid and may need to be amended. The policy would then require updating to correspond with the amendment. The Shire may wish to seek legal advice in relation to this apparent irregularity. Not to be actioned |
| CPA15 - Attendance at Events Policy | <ul style="list-style-type: none"> Provided a pinpoint legislative reference in the 'objective'. Amended the policy to state the expectation for obligations under the <i>Local Government Act 1995</i> (WA) (CKI) to be met but to avoid reiterating the requirements of the Act. Shire policy is not required to reiterate obligations of councillors and the CEO under | |

| Policy | Amendments | Further Considerations |
|---|--|---|
| | <p>the <i>Local Government Act 1995</i> (WA) (CKI). (Note: we have assumed that the Shire has an applicable code of conduct).</p> <ul style="list-style-type: none"> Relocated text from the 'policy' section to the 'scope' section as this text outlines which invitations are covered under this policy. Identified the relevant location as the Shire's 'district' rather than the 'Shire', where appropriate. | |
| CPA16 - Complaints Handling and Public Interest Disclosures Policy | <ul style="list-style-type: none"> Included the <i>Local Government Act 1995</i> (WA) (CKI), the <i>Public Interest Disclosures Act 2003</i> (WA) (CKI) and the <i>Corruption, Crime and Misconduct Act 2003</i> (WA) (CKI) under 'relevant legislation/local law'. Removed reference to the effectiveness of the policy. Wrote 'Public Sector Commission' in full. Specified that complaint forms for complaints about council members can be obtained either from the Department of Local Government's website or by contacting the CEO. | <ul style="list-style-type: none"> The Shire may like to consider linking this policy to obligations under its code of conduct for employees and councillors. The policy currently uses the definitions of 'serious misconduct' and 'minor misconduct' that are found in the <i>Corruption, Crime and Misconduct Act 2003</i> (WA) (CKI) to define misconduct by Shire employees and council members. However the definition of 'minor misconduct' found in the <i>Crime and Misconduct Act 2003</i> (WA) (CKI) is not applicable to member of a local government-or council of a local government. This definition is therefore not appropriate. The Shire may wish to seek legal advice in relation to identifying the most appropriate legal definition and how to tie this policy to the appropriate sources of power. Procedural elements found within the policy (e.g. information found in the table under 'statutory complaints') should be removed and kept in a separate procedural document. <p>Policy has been withdrawn pending major review of regulatory changes.</p> |
| Customer Service Charter | | <ul style="list-style-type: none"> The procedure for managing complaints was |

| Policy | Amendments | Further Considerations |
|--|---|---|
| | | updated during the development of the Regulation 17 Action Plan. The Customer Service Charter should be amended to reflect these changes, if not done so already. <i>Not to be actioned</i> |
| Customer Service Feedback Form | | |
| Community | | |
| CPC1 - Importation of Poultry and other Species to Cocos (Keeling) Islands Policy | <ul style="list-style-type: none"> Wrote 'Australian Quarantine and Inspection Service' in full. | <ul style="list-style-type: none"> Civic Legal has doubts as to the validity of this policy. We understand that the Shire has a legitimate interest in controlling the importation of poultry to the Cocos (Keeling) Islands. However, it is not immediately obvious to us that the Shire has the power to control the importation of poultry in the way envisaged by the policy. We note that no legislation has been cited as the source of power. Legal advice should be obtained to identify what source of power the Shire can rely on to achieve its objectives. <i>For noting</i> Once issues have been dealt with, a 'scope' should be drafted. <i>Actioned</i> |
| CPC2 - Motor Vehicles on Home Island Policy | <ul style="list-style-type: none"> Minor amendment made to the 'objective' to more accurately describe the effect of the policy. | <ul style="list-style-type: none"> Civic Legal has doubts as to the validity of this policy. We understand that the Shire has a legitimate interest in controlling the type of vehicles on Home Island's paved roads. However, it is not immediately obvious to us that the Shire has the power to limit the registration of vehicles as a means of such control. We note that no legislation has been cited as the source of power. Legal advice should be obtained to identify what source of power the Shire can rely on to achieve its objectives. <i>For noting</i> |

| Policy | Amendments | Further Considerations |
|---|--|---|
| CPC3 - Prevention of Cats Being Imported to Cocos (Keeling) Islands Policy | <ul style="list-style-type: none"> Drafted a basic 'scope'. Changed the 'guidelines' heading to 'policy' to ensure consistency with other policies. Relocated text from the 'policy statement' section to the 'policy' section. | <ul style="list-style-type: none"> Civic Legal has doubts as to the validity of this policy. We understand that the Shire has a legitimate interest in controlling the importation of cats to the Cocos (Keeling) Islands. However, it is not immediately obvious to us that the Shire has the power to control the importation of cats in the way envisaged by the policy. We note that no legislation has been cited as the source of power. Legal advice should be obtained to identify what source of power the Shire can rely on to achieve its objectives. For noting Identify a Responsible Officer rather than referring to local law. Actioned |
| CPC4 - Shipping and/or Sea Containers Policy | <ul style="list-style-type: none"> Drafted a basic 'scope'. Removed the 'Objective' as the 'policy statement' provided a sufficient objective. Replaced the 'policy statement' subheading with 'objective'. Changed the 'guidelines' heading to 'policy' to ensure consistency with other policies. Included the <i>Shire of Cocos (Keeling) Islands Local Planning Scheme No. 1</i> (LPS1) in the 'relevant Legislation/Local Law' section. | |
| CPC5 - Community Funding Program | <ul style="list-style-type: none"> Capitalised the titles of official Shire documents. Identified the relevant location as the Shire's 'district' rather than the 'Shire of Cocos Keeling Islands', where appropriate. Wrote 'Community Funding Program Committee' in full. | |

| Policy | Amendments | Further Considerations |
|--|---|--|
| CPC6 - Home Island Housing Policy | <ul style="list-style-type: none"> • Formatting issue - 'Scope' text was found under 'objective'. This text has been relocated under 'scope'. • Included the relevant trust deeds in the 'relevant legislation/local law' section. • Minor amendments have been made to clarify relevant sentences. | <ul style="list-style-type: none"> • This is a Trustee policy rather than a Shire council policy. We recommend that it be removed from the Shire policy manual and kept in a separate manual of trustee policies. Alternatively, if you would like to keep this policy in the Shire policy manual, the policy should state that this is a policy of the council in its capacity as trustee. A sentence has been added at the beginning of the policy notifying that it is a Trustee policy. • Define the assessment criteria for allocating houses or identify the document containing the assessment criteria. Not to be actioned. Policy already details the criteria. |
| CPC7 - Camping Policy | <ul style="list-style-type: none"> • As per Shire request (email dated 13 January 2021): Amended 'resident' definition as per the Territory Controller's definition during Covid-19 state of emergency. | |
| Employee | | |
| CPE1 - Annual Airfares Entitlement Policy | <ul style="list-style-type: none"> • Removed the administrative note under the definition of 'immediate family'. | |
| CPE2 - Ferry Travel Allowance Policy | | |
| CPE3 - Fitness for Work Policy | | |
| CPE4 - Internet and Email Usage Policy | <ul style="list-style-type: none"> • Amended the 'scope' to ensure the policy captures actions outside of employee's scope of work (e.g. anything done during work hours or using Shire equipment). • Amended example b) of unacceptable use of internet by employees so as to identify the use of Shire email service as a component of internet use rather than an alternative. | |
| CPE5 - Shire Employees | | |

| Policy | Amendments | Further Considerations |
|---|--|--|
| Undertaking Secondary Employment Policy | | |
| CPE6 - Superannuation Contribution Policy | <ul style="list-style-type: none"> Amended the 'policy' section to identify that the <i>Local Government (Amendment of Part VIA – Employee Superannuation) Regulations 2006</i> (WA) (CKI) has been replaced with the <i>Local Government (Employee Superannuation) Regulations 2016</i> (WA) (CKI). | |
| CPE7 - Travel Allowance Policy | <ul style="list-style-type: none"> Included the <i>Income Tax Assessment Act 1997</i> in the 'Relevant Legislation/Local Law' section. | |
| CPE8 - Recruitment and Selection Policy | <ul style="list-style-type: none"> Removed reference to Queensland legislation (CEO definition). Replaced definition of 'CEO'. Referenced CPA5 in the 'policy' section (referred to dealing with family members) and in the 'relevant legislation/local law' section. Wrote 'working with children clearances' in full. Amended the 'policy' section to replace the term 'conflicts of interest' with 'interests' due to the incorrect use of the term 'conflict of interest'. | <ul style="list-style-type: none"> In the 'policy' section under the 'Declaration of Interest' subheading, the policy specifies that the CEO should be consulted in the event that a consensus cannot be reached. The Shire should clarify if the CEO is to reach a decision or assist the panel to do so. The policy should then be amended accordingly. Actioned |
| Finance | | |
| CPF1 - Corporate Credit Card Policy | | |
| CPF2 - Funding Contributions – Resident Further Education Policy | <ul style="list-style-type: none"> Formatting issue – Text from the 'Scope' section was found in the 'policy' section. This text has been relocated under 'scope'. | |
| CPF3 - Investment Policy | | <ul style="list-style-type: none"> Reference to the <i>Trustees Amendment Act 1962</i> suggests that this policy may apply to trustee funds as well as the Shire's funds. It is outside the scope of our engagement to analyse the policy with respect to the obligations of the council as trustee. However, we recommend that the Shire decide if it |

| Policy | Amendments | Further Considerations |
|--|--|---|
| | <p>Not actioned. Reference to Trustees Act removed as there are no trustee funds to invest.</p> | <p>intends this policy to apply to its role solely as the Shire in relation to Shire investments or also the council in its role as trustee. The Shire may ultimately then state in its scope that the policy does (or does not) apply to the investment of funds held by the council as trustee. The Shire may also consider removing this policy from the Shire policy manual and keep it in a separate manual of trustee policies, as recommended for CPC6.</p> <ul style="list-style-type: none"> The Shire may wish to consider obtaining legal advice as to how it should approach the investment of funds as trustee and what other steps it should take to promote clearer and better governance in this area. |
| CPF4 - Purchasing Policy | <ul style="list-style-type: none"> As per Shire request (email dated 13 January 2021): Updated officer title (Governance and Risk Coordinator). As per Shire request (email dated 13 January 2021): Amended the 'policy' section so purchases over \$20,000 require two written quotes. We have assumed this does not apply to WALGA preferred suppliers. Amended the scope to specify the relevant timeframe of purchases by officers. Amendments have been made to clarify relevant sentences. | |
| CPF5 - Related Party Transactions Disclosure Policy | <ul style="list-style-type: none"> Replaced 'profit or loss' with 'surplus or deficit' as this terminology is more relevant in a local government context. | |

| Policy | Amendments | Further Considerations |
|---|---|---|
| | <ul style="list-style-type: none"> Amendments have been made clarify relevant sentences. Replaced '1' and '2' under the 'scope' section with 'a)' and 'b)'. Included AASB 124 in the 'relevant legislation/local law' section. | |
| CPF6 - COVID-19 Financial Hardships Policy | | |
| CPF7 - Recovery of Sundry Debts Policy | | |
| Risk | | |
| CPR1 - Occupational Safety and Health Policy | <ul style="list-style-type: none"> Included an additional dot-point under the 'responsibilities'/'councillor' subheading. This dot-point is also included under the 'responsibilities'/'CEO' subheading. | |
| CPR2 - Personal Protective Equipment and Clothing Policy | | |
| CPR3 - Building Heights Policy | <ul style="list-style-type: none"> Included the <i>Planning and Development Act 2005</i> (WA) and the <i>Shire of Cocos (Keeling) Islands Town Planning Scheme 1</i> under the 'Relevant Legislation/Local Law' section. | |
| CPR4 - Temporary Signs Policy | <ul style="list-style-type: none"> Wrote 'Temporary Signs Policy' in capitals. | |
| CPR5 - Caretaker's Dwelling Policy | <ul style="list-style-type: none"> Amended the language used in the 'scope' to more accurately capture to content of the policy. | <ul style="list-style-type: none"> Identify a Responsible Officer. Actioned |
| CPR6 - Asset Management Policy | <ul style="list-style-type: none"> Minor amendment made to the 'relevant legislation/local law' section to improve clarity. | |
| Planning | | |
| CPP1 - Naming of Roads, Reserves and Structures Policy | | |

| Policy | Amendments | Further Considerations |
|--|---|--|
| CPP2 - Publishing of Delegated Legislation and State-wide Public Notices Policy | | <ul style="list-style-type: none"> Include the relevant legal advice received under a 'related documents' section. <p>Not actioned - information is already included in the policy.</p> |
| CPP3 - South End Precinct Commercial Development Policy | <ul style="list-style-type: none"> Included the <i>Environmental Protection (Noise) Regulations 1997</i> and the <i>Shire of Cocos (Keeling) Islands Local Planning Scheme No. 1 (LPS1)</i> in the 'Relevant Legislation/Local Law' section. | <ul style="list-style-type: none"> Identify a Responsible Officer Actioned We do not have information as to the source of legal power enabling the Shire to lease this land. The Shire may wish to consider obtaining legal advice to confirm its source of power. Alternatively, if it is satisfied as to what its source of power is, then it can amend the policy to state that source (e.g. power as the trustee of the land or from a management order with respect to Crown Land etc.). <p>It has been clarified in the policy that it is the Trustee that leases the land not the Shire.</p> |
| CPP4 - New Bed and Breakfast Establishments Policy | <ul style="list-style-type: none"> Wrote 'Residual-current devices' (RCDs) in full. | |
| CPP5 - New Holiday Homes Policy | <ul style="list-style-type: none"> Included the <i>Planning and Development Act 2005 (WA)</i>, the <i>Equal Opportunity Act 1984 (WA)</i>, the <i>Fair Trading Act 1987 (WA)</i> and the <i>Shire of Cocos (Keeling) Islands Local Planning Scheme No. 1 (LPS1)</i> in the 'Relevant Legislation/Local Law' section. | |

Additional Policies Not actioned

As part of the Policy Manual review, Civic Legal has considered if there are additional policies which may be beneficial for the Shire.

The Policy Manual currently includes an adequate range of policies as per the *Local Government Act 1995* (WA) (CKI). However the Shire may wish to the following additional policies:

Accounting Policy

An Accounting Policy, would outline consistent positions for the preparation of financial statements as per the *Local Government (Financial Management) Regulations 1996* (WA) (CKI) and Australian Accounting Standards. We understand that this information may be captured in another internal document. The Shire may wish to consult with its auditors as to the need for and content of such a policy.

Risk Management Policy

A Risk Management Policy, which would state the Council's position in regard to upholding the principles, framework and process of managing risk as outlined in AS/NZS ISO 31000:2009. The Shire may wish to consult with LGIS as to the content of such a policy.

Regional Price Preference Policy

The Shire may like to consider whether or not a Regional Price Preference Policy would be valuable to the Shire in certain circumstances. See Part 4A of the *Local Government (Functions and General) Regulations 1996* (WA) (CKI).

Conclusion

Policy manuals are not the easiest of documents to create and maintain. They are not merely the result of a drafting and editing process. They require a great deal of other work, such as consultations within the organisation to achieve clarity of thinking as well as decision-making tailored to the organisation. While the work marked out by this review will upgrade the Policy Manual, continuous improvement efforts by the Shire should result in even more positive outcomes.

We commend the Shire for engaging in this review process and express our thanks for this opportunity to assist.

Yours faithfully



ANTHONY QUAHE
Principal

