

INDEPENDENT COMMISSION AGAINST CORRUPTION

STATEMENT IN THE MATTER OF: Operation Gerda

PLACE: University of Sydney

NAME: Nisha Graham

ADDRESS: The University of Sydney, NSW 2006

OCCUPATION: Chief Risk Officer

DATE: 19 July 2018

States: -

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1. This statement made by me accurately sets out the evidence which I would be prepared, if necessary, to give in Court as a witness. The statement is true to the best of my knowledge and belief, and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.
 2. I am 34 years of age.
 3. As at May 2018, I had held the position of Chief Risk Officer for just under two years.
 4. The position's primary function is to design and implement the framework and ways by which the University manages risk. I am responsible for implementing that framework and guiding everyone who has a role in the framework.

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5. The University has an overarching risk management policy that references a risk appetite and tolerance statement, and a risk framework. The policy outlines what the University's appetite and tolerance for risk is.

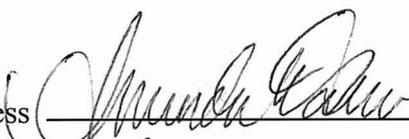
6. The University has a very low risk tolerance and in fact no risk appetite for safety and those related risks. The University does whatever is reasonably practical to address those risks.

7. The risk management framework outlines who the risk owners are and their responsibilities in managing risk, what the process is in identifying and evaluating risk, and how we determine the actions that need to be taken to manage risk. It also outlines how risks are reported and the components that relate to reporting.

8. As at May 2018, the University had a number of risk registers. There is the Enterprise Thematic Risk Register, which outlines high level risk themes from the institutional perspective. Under that, we have the Organisational Risk Register, which is a template that translates the enterprise risks into the relevant risk themes for individual units and details the controls that should be in place. It also has many control self-assessment questions that will be used to validate effectiveness of controls. These registers are all quite new and are in the process of being rolled out for the first time across all faculties and departments at the University. The aim is to provide a systematic template of risks that would be associated with each department and the actions that should be in place within each department.

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9. Linked to these registers will be local unit risk registers. If there is anything specific to a particular department, not covered by the organisational risk register, it will be in the local unit risk register.
10. There may be other risk registers in place at the University, but those are the three types of registers that are covered by the risk management framework I oversee.
11. The Enterprise Thematic Risk Register currently has 23 risk themes. For the safety risk theme, there is a very high level of detail around the University's culture towards safety and its appetite and tolerances towards safety, and references to the University's mitigation plan. This register references the safety framework that we have in place, the safety procedures, etc. The detail would be in the safety department's procedures and framework.
12. The Enterprise Thematic Risk Register was established last year – March to mid-year.
13. As at May 2018, the registers are stored in Word or Excel.
14. As at May 2019, the Organisational Risk Register had 14 risk themes. There would be over a hundred controls related to those risk themes and over 450 control self-assessment questions. There is a risk theme around safety.
15. As at May 2018, we had not formally established all of the local unit risk registers.

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16. As at May 2018, we were conducting the second pilot of our Organisational Risk Register. The first pilot of that process began in April 2018.

17. Before I joined the organisation, a consolidated risk register existed.

18. In drafting the Enterprise Thematic and Organisational Risk Registers, my team and I had many conversations and multiple workshops with the relevant stakeholders. We had a number of iterations of drafts of the risk register that were reviewed and updated through consultation. My team stores copies of the documents centrally. The provision of security services was discussed in the context of being a mitigating factor of high level risks.

19. I cannot answer if a detailed risk assessment of security risks has contributed to creating an umbrella security strategy. There have been components of safety and security risks that have been discussed in broader risk conversations.

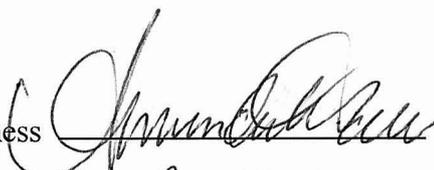
20. I have not had any involvement in a broad security strategy. I have been involved in discussions regarding the anti-terrorism security strategy.

21. I am part of an Emergency Planning Committee that looks at emergency related risks including compliance with the new crowded places government guidelines and monitoring the terrorism threat level in Australia.

22. My team and I coordinate updates to the Enterprise Thematic Register: these updates go to every Senate Strategy and Risk Committee. The format of the

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reports are the same each cycle. I believe there are six or seven meetings a year.

The regular updates include a report on the status of general risk management activity and a table of the 23 Enterprise Thematic Risks with a row for each risk outlining the inherent, residual and target risks, the risk trend, and an update on the status of mitigation actions and the risk management plans in relation to that risk. Most recently, we have added information on recent internal audit reports that relate to a particular risk.

23. There are no other reports that go out of my area on a regular basis.

24. My area is not responsible for any other reports dealing specifically with safety issues.

25. Risks relating to procurement are referenced in the Organisational Risk Register in risk themes related to ICT and finance. Supply chain is not listed as a risk theme in itself.

26. Fraud and corruption risks are referenced in the Enterprise and Organisational risk registers in risk themes related to culture and finance, and in the Risk Appetite and Tolerance Statement.

27. My department does not oversee fraud and corruption risk assessments.

28. As at May 2018, my area did not receive reports of incidents, for example those concerning student safety, to help assess risks. When we are informed of incidents

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we do take them into consideration when reviewing risk themes, risk mitigation plans, or risk management strategy in general. There is no formal process right now that is in place to inform us of such incidents.

- 29. We do not get formal or regular reports from the security area or the student services area.
- 30. As at May 2018, a control self-assessment process, through the Organisational Risk Register process, is being trialled with small departments, and the plan is, if all goes well, we will commence rolling it out across the University from July as quickly as we can. It is anticipated it may take until November to implement the entire process.
- 31. My area has not participated in assurance mapping as described by Mr Barry Davidow as a formal process, however updating the organisational risk register would involve aspects of this process.
- 32. As at May 2018, the University is still quite early in the process of implementing the new Risk Management Framework and my area has not rolled out the Organisational Register yet - so I cannot say that all risks have been adequately captured right now. However, my area is establishing the structures, systems and processes to help us get there.
- 33. The Director of Safety is Julia Cohen and this area looks after safety, health and wellbeing.

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