AGENDA.

Audit, Risk and Improvement Committee Meeting

9 November 2026

Notice of Meeting

Mayor, Councillors and External Committee Members

The next Audit, Risk and Improvement Committee Meeting will be held on Monday 9 November 2026 in the City of South Perth Council Chamber, corner Sandgate Street and South Terrace, South Perth commencing at 6.00pm.

ANITA AMPRIMO
ACTING CHIEF EXECUTIVE OFFICER

5 November 2026

City of South Perth

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Audit, Risk and Improvement Committee - Agenda

1. DECLARATION OF OPENING / ANNOUNCEMENT OF VISITORS

2. ATTENDANCE

2.1 APOLOGIES

2.2 APPROVED LEAVE OF ABSENCE

- Councillor Christine Robinson for the period 29 October 2026 to 9 November 2026, inclusive.

3. DECLARATIONS OF INTEREST

4. CONFIRMATION OF MINUTES

4.1 AUDIT, RISK AND IMPROVEMENT COMMITTEE MEETING HELD: 15 September 2026

Officer Recommendation

That the Minutes of the Audit, Risk and Improvement Committee Meeting held 15 September 2026 be taken as read and confirmed as a true and correct record.

5. PRESENTATIONS

6. REPORTS

6.1 2025/26 CITY OF SOUTH PERTH ANNUAL FINANCIAL REPORT

File Ref: D-26-15357
Reporting Officer(s): Anita Amprimo, Acting Chief Executive Officer

Summary

This report tables the 2025/26 Annual Financial Report, the Independent Auditor's Report and the Office of the Auditor General Exit Report. The WA Auditor General has once again issued an unqualified opinion in the draft Independent Auditor's Report.

Officer Recommendation

That the Audit, Risk and Improvement Committee recommends to Council that it:

1. Adopt the Annual Financial Report shown at **Attachment (a)**;
2. Accepts the Independent Auditor's Report on the 2025/26 Annual Financial Report presented by the WA Auditor General; and
3. Accepts the WA Auditor General Annual Financial Audit Exit Report shown at Confidential **Attachment (b)**.

Background

It is the CEO's responsibility to ensure the preparation and fair presentation of the annual financial report in accordance with the requirements of the *Local Government Act 1995*, the Local Government (Financial Management) Regulations 1996 and Australian Accounting Standards.

It is the Auditor's responsibility to express an opinion on the annual financial report. The external audit report and Annual Financial Report is provided to the Audit, Risk and Improvement Committee (ARIC) for review.

The 2025/26 Annual Financial Report as shown at **Attachment (a)** provides the community with an open and accountable insight into how the City has performed against the adopted 2025/26 Annual Budget, which was informed by the vision and strategic objectives outlined in the City's Strategic Community Plan 2021-2031.

At the time of drafting this report, the Independent Auditor's Report for the 30 June 2026 Annual Financial Report had not been finalised for submission to the City. The WA Auditor General had advised this is likely to be finalised by the week of 9 November 2026 to enable consideration by Council. Given the date of this ARIC meeting, this has not been included as an attachment to this report however, the WA Auditor General has presented their findings in the Annual Financial Audit Exit Report which is provided at Confidential **Attachment (b)**. Part two of the Officer Recommendation recommends that ARIC recommends to Council that it accepts this report. Upon receipt of the report, this will be provided to members and Council to enable a decision at the Ordinary Council Meeting.

Comment

The Annual Financial Audit Exit Report in Confidential **Attachment (b)** at Part 2 titled "Result of key audit focus areas" confirms that there were no issues noted.

- Part 3 titled "Management letter findings" summarises the movement of management letter findings for the 2025/26 financial year.
- Appendix 1 to the Annual Financial Audit Exit Report itemises the findings at a heading level. The findings relate to the Information Systems audit findings, there are no Reporting and Financial Control findings. Appendix 1 describes and includes a summary of the "Information systems control issues." The Information Systems audit is performed as part of the Annual Financial Audit. Details are reported to the ARIC in a separate report forming part of the agenda for this meeting.
- Part 4 refers to an "Information Systems Maturity Model." As part of the information systems audit a Capability Maturity Assessment is performed. The capability maturity model is a way of assessing how well developed and capable the established IT controls are. The current assessment shows that the City's maturity across a number of areas have remained constant with only one rating lowered.
- Part 5 of the Exit Report describes adjusted and unadjusted audit differences and confirms that there are no unadjusted differences.
- Part 6 of the Exit Report is a summary of the status mandatory communications with the ARIC.
- Parts 7 deals with next year's audit.

The WA Auditor General has once again issued an unqualified opinion in the draft Independent Auditor's Report.

The City recommends that the ARIC receive the presentation by officers from the Office of the Auditor General and note the 2025/26 Annual Financial Report including the draft audit opinion and the Annual Financial Audit Exit Report.

The ARIC may make recommendations to Council, with Council to approve the Annual Financial Report to be included in the Annual Report, for presentation at the annual Electors' General Meeting.

The Annual Financial Report and Independent Auditor's Report are complete. There may be minor layout and textual amendments (presentation amendments) to the Annual Financial Report prior to it being presented to the Electors' General Meeting in February 2027.

Consultation

Nil.

Policy and Legislative Implications

Section 5.53(1) of the *Local Government Act 1995* requires a local government to prepare an annual report for each financial year. Section 5.53(2) of the *Local Government Act 1995* specifies that the Annual Report is to contain the financial report and auditor's statement for that financial year.

Financial Implications

The estimated cost of the OAG Audit for 2026/27 is $114,900 plus GST. Costs associated with the External Audit were included in the 2026/27 Annual Budget.

The preparation of the Annual Financial Report was also provided for in the 2026/27 Annual Budget.

Key Risks and Considerations

Risk Event Outcome	**Legislative Breach** Refers to failure to comply with statutory obligations in the manner in which the City, its officers and Elected Members conduct its business and make its decisions and determinations. This embraces the full gamut of legal, ethical and social obligations and responsibilities across all service areas and decision making bodies within the collective organisation.
Risk rating	Low
Mitigation and actions	Annual Financial Report provided in compliance with the requirements of the *Local Government Act 1995.*

Strategic Implications

This matter relates to the following Strategic Direction identified within Council's Strategic Community Plan 2021-2031:

Strategic Direction:	Leadership
Aspiration:	A local government that is receptive and proactive in meeting the needs of our community
Outcome:	4.3 Good governance
Strategy:	4.3.4 Maintain a culture of continuous improvement

Attachments

6.1 (a):	Annual Financial Report
6.1 (b):	WA Auditor General Annual Financial Audit Exit Report *(Confidential)*

6.2 2025/26 ANNUAL FINANCIAL STATEMENT (EXTERNAL) AUDIT INFORMATION SYSTEMS REPORT

File Ref: D-26-16993
Reporting Officer(s): Anita Amprimo, Acting Chief Executive Officer

Summary

This report tables the Information Systems Audit report from the Office of the Auditor General (OAG), referred to as a Management Letter. The Information Systems Audit was performed as part of the 2025/26 Annual Financial Statements Final Audit. The Information Systems Audit Management letter includes 15 findings, risk ratings, recommendations, and management comments.

It is recommended that all the findings are accepted and added to the City's Audit Register. Commentary on progress of resolution to be reported at each Audit, Risk and Improvement Committee Meeting. Officers from the Office of the Auditor General will be in attendance to discuss and answer questions regarding the content of the Management Letter.

Officer Recommendation

That the Audit, Risk and Improvement Committee recommends to Council that it:

1. Notes and accepts the Information Systems Audit Management Letter Confidential **Attachment (a)**; and
2. Includes the findings in the Information Systems Audit Management Letter in the Audit Register.

Background

The external audit of the Annual Financial Report is conducted separately from any internal audit activities. External audit focuses on providing an objective independent opinion of the financial statements prepared by the City. In forming that opinion, testing is undertaken of internal controls, systems and procedures that form the basis of the balances that make up the Annual Financial Report.

The *Local Government Amendment (Auditing) Act 2017* made legislative changes to the *Local Government Act 1995* to provide for the auditing of local governments by the Office of the Auditor General (OAG). The changes also allow for the OAG to undertake various types of audits including Information System Audits. These audits are conducted at a sample of Local Government entities.

The WA Auditor General undertakes Information Systems Audits at selected Local Governments. Findings are presented to Parliament in the summary report. The results of the City's audit will be incorporated into the summary report presented to Parliament.

The Information Systems Audit focuses on the computer environments to determine if these effectively support the confidentiality, integrity and availability of information they hold.

Following on from the last eight years, the OAG performed the City of South Perth 2025/26 Annual Financial Statements external audit. The external audit occurs in two steps, the first being an interim audit which typically tests controls around transactions, with the final stage being the audit work to attest the balances and notes that comprise the Annual Financial Statements.

Comment

The 2025/26 final audit was conducted in October 2026, with the Information Systems Audit Management Letter in Confidential **Attachment (a)** being issued. The 2025/26 audit identified 15 findings. No findings have been rated as significant, and all findings are confirmed to have no impact on the audit opinion on the Annual Financial Report.

Of the 15 findings within the 2025/26 audit, of which 10 were replicated from the previous audits. Whilst a number of findings have remained outstanding across audit years, work has been undertaken to address these however, due to costs, supplier and internal resourcing issues, some of these remain progressing. The City will continue to work through all findings in priority order, within its resourcing constraints.

The findings in the Information Systems Audit Management Letter will be included in the Audit Register. Progress will be monitored by the City, the ARIC and Council.

Consultation

Nil.

Policy and Legislative Implications

Local Government Act 1995
Local Government Amendment (Auditing) Act 2017
Local Government (Audit) Regulations 1996

Financial Implications

The estimated cost of the OAG Audit for 2026/27 is $114,900 plus GST.

Costs associated with the External Audit were included in the 2026/27 Annual Budget.

Key Risks and Considerations

Risk Event Outcome	**Legislative Breach** Refers to failure to comply with statutory obligations in the manner in which the City, its officers and Elected Members conduct its business and make its decisions and determinations. This embraces the full gamut of legal, ethical and social obligations and responsibilities across all service areas and decision making bodies within the collective organisation.
Risk rating	Low
Mitigation and actions	Ensuring audit functions are undertaken in accordance with the requirement of the *Local Government Act 1995* and the Regulations.

Strategic Implications

This matter relates to the following Strategic Direction identified within Council's Strategic Community Plan 2021-2031:

Strategic Direction:	Leadership
Aspiration:	A local government that is receptive and proactive in meeting the needs of our community
Outcome:	4.3 Good governance
Strategy:	4.3.1 Foster effective governance with honesty and integrity and quality decision making to deliver community priorities

Attachments

6.2 (a): Information Systems Audit Management Letter *(Confidential)*

6.3 AUDIT REGISTER - QUARTER ONE REPORT

File Ref: D-26-16752
Reporting Officer(s): Anita Amprimo, Acting Chief Executive Officer

Summary

This report provides an update on the progress of actions included in the Audit Register since last presented to the ARIC at the meeting on 15 September 2026.

Officer Recommendation

That the Audit, Risk and Improvement Committee notes the progress recorded against each item within the Audit Register in Confidential **Attachment (a)**.

Background

The confidential Audit Register as contained in Confidential **Attachment (a)** is presented at each Audit, Risk and Improvement Committee (ARIC) meeting.

The Register:

- Lists every open external and internal audit finding.
- Describes the progress of implementing audit recommendations and tracks that as a percentage of completion.

The Audit Register is formatted to ensure clarity as detailed below:

1. The Audit Register presents audit outcomes by 'Finding' numbers. Any given Finding may have more than one 'Recommendation' and associated 'Agreed Management Action.'
2. Updates in relation to each Finding are displayed in chronological order i.e. latest update appears at the bottom of each Finding.
3. Each Finding that is to be closed (i.e. 100% complete for all Agreed Management Actions) is represented by a purple 'Closed Tally' column on the right.
4. All Findings that are being recommended for closure by the ARIC are filtered to the end of the register. Only when all Agreed Management Actions related to a Finding are marked as 100% complete, will it be recommended that the Finding be closed.

All closed items will not form part of the Audit Register report for future meetings.

At its 15 September 2026 ARIC meeting, the City advised that updates on audit findings for the Customer Service, Social Media and Stakeholder Audit and Records Management Audit will be provided in the next reporting period. Any findings from this audit have since been included in the Audit Register.

Comment

The Audit Register is shown in Confidential **Attachment (a)**.

The following finding will be closed as it is complete:

Finding #	Finding
243	Opportunity to enhance guidance on personal and professional social media use following better practices.

Consultation

Nil.

Policy and Legislative Implications

Local Government Act 1995
Local Government (Financial Management) Regulations 1996
Local Government (Audit) Regulations 1996

Financial Implications

Nil.

Key Risks and Considerations

Risk Event Outcome	**Legislative Breach** Refers to failure to comply with statutory obligations in the manner in which the City, its officers and Elected Members conduct its business and make its decisions and determinations. This embraces the full gamut of legal, ethical and social obligations and responsibilities across all service areas and decision making bodies within the collective organisation.
Risk rating	Low
Mitigation and actions	The City is subject to a comprehensive OAG Audit each year. The City has a Council endorsed three-year Strategic Internal Audit Plan which runs from 2024/25 to 2026/27. The City completes an annual Compliance Audit Return and undertakes Regulation 5 and 17 audits, as per legislation. The recommendations from those reports are reported on Quarterly reporting to ARIC and Council for transparency.

Strategic Implications

This matter relates to the following Strategic Direction identified within Council's Strategic Community Plan 2021-2031:

Strategic Direction:	Leadership
Aspiration:	A local government that is receptive and proactive in meeting the needs of our community
Outcome:	4.3 Good governance
Strategy:	4.3.1 Foster effective governance with honesty and integrity and quality decision making to deliver community priorities

Attachments

6.3 (a): Audit Register *(Confidential)*

6.4 CORPORATE BUSINESS PLAN - QUARTERLY REPORT - Q4 2025/26 AND Q1 2026/27

File Ref: D-26-16833
Reporting Officer(s): Anita Amprimo, Acting Chief Executive Officer

Summary

This report provides an update on the progress of the Corporate Projects and Measures of Success identified in the Corporate Business Plan for the preceding quarters, being Q4 of 2025/26 and Q1 of 2026/27.

It is recommended that the Audit, Risk and Improvement Committee notes the progress recorded against each Corporate Project/Activity contained within the quarterly reports and notes the results for all Measures of Success (Key Performance Indicators) contained within the Corporate Business Plan Measures of Success Report.

Officer Recommendation

That the Audit, Risk and Improvement Committee notes:

1. The progress recorded against each Project/Activity within the Corporate Business Plan for Q4 2025/26 and Q1 2026/27 as described in the reports contained within **Attachment (a)** and **Attachment (c)** respectively.
2. The results recorded against each Measure of Success within the Corporate Business Plan as described in the Key Performance Indicator reports for Q4 2025/26 and Q1 2026/27 contained within **Attachment (b)** and **Attachment (d)** respectively.

Background

The Strategic Community Plan (SCP) 2021-2031 was endorsed by Council at its Ordinary meeting held 14 December 2021. A minor review of the SCP was completed and endorsed by Council at its Ordinary meeting held 23 April 2024.

The Corporate Business Plan (CBP) translates the aspirations and strategies of the SCP into operational priorities and indicates how they will be resourced over a four-year period. The CBP outlines in detail the services and projects required to ensure delivery of the SCP and includes measures of success as an indication of performance. The CBP 2024/25 – 2027/28 was adopted by Council at its meeting held 25 June 2024 and is reviewed annually.

Whilst the City presented the CBP for review and adoption in accordance with Regulation 19DA(4) of the *Local Government (Administration) Regulations 1996*, the City advised that it intended to provide a further CBP review (review of corporate projects and measures of success), following progression of the development of the Council Plan, which will replace the SCP.

Council subsequently reviewed and adopted the CBP with no changes at its 30 June 2026 Ordinary meeting. As Council adopted no changes to the current CBP, the lifespan of the current CBP was extended by one year, with corresponding timeframes for the delivery of projects reflecting the previous year.

Whilst this report is provided to the Audit, Risk and Improvement Committee (ARIC) to ensure oversight of the delivery of the current CBP, development of the Council Plan is currently progressing and is intended to be presented to Council for adoption in Q1 of 2027, following which new priority actions and KPIs will be reported on.

Comment

Quarter 4 - 2025/26 Planning Year

The following is the progress report for Quarter 4 of the 2025/26 planning year.

2025/26 Corporate Business Plan – 4th Quarter Update Corporate Actions

The following table provides an overview of the progress of the 37 Corporate Actions scheduled for delivery in the CBP for 2025/26. It is noted that the project 'Public Transport Services Advocacy' is reported on annually not quarterly, therefore previous quarterly update reports stated 36 projects, as this item is only reported in Q4:

On Track	Complete	On hold
23 (62%)	13 (35%)	1 (3%)

The CBP Project/Activity Report for Q4 of 2025/26 is contained as **Attachment (a)** with City comments in the 'Quarterly Updates' column for each quarter.

2025/26 Corporate Business Plan – 4th Quarter Update Key Performance Indicators

The following table provides an overview of the progress of the 49 Key Performance Indicators (KPI's / Measures of Success) included in the CBP. It is noted that there are 14 KPIs that are reported annually, therefore the previous quarterly update reports stated 35 projects as an update, with the balance of the KPIs reported in Q4:

Achieved	Not Achieved
43 (88%)	6 (12%)

The CBP KPI Report for Q4 of 2025/26 is contained as **Attachment (b)** with City comments in the 'Result Comment' column when a KPI is not achieved.

The following table extracts information from this Report in relation to KPIs that were Not Achieved:

KPI Description	Performance Measure	2025 / 26 Target	Result	Result Comment
Library Attendee Targets - The number of people visiting or attending the City's two Library branches (Manning and South Perth)	= 5 visits per capita annually (ALIA minimum benchmark) (235,000 visits p.a. for 25/26)	235,000.00	197,069.00	The recently completed Library Survey will be used to evaluate customer feedback, better understand this trend, and identify opportunities.

Facility Capital Projects delivered on budget - Percentage of facility capital projects delivered within budget +/- 10% (in accordance with budget approved for the financial year)	95%	95	75	3 projects completed. Coode St under. SPTC under. Civic IT overrun, original budget allocation of $125,000 was identified at an early stage as being insufficient to fully achieve the project objectives.
Facility Capital Projects delivered on time - The percentage of facility capital projects delivered on time (in accordance with projects scheduled for the financial year)	95%	95	75	3 projects completed - Coode St, SPTC & Civic IT. 10 projects in progress. 3 projects On Hold.
Recreation Facility Condition Satisfaction - The percentage satisfaction rate of facility user survey respondents reporting satisfaction with the condition of the facility they have booked	Maintain satisfaction rate above 70%	70	0	Rating was derived from the recent MARKYT Community Scorecard that rated sport/recreation services & facilities at 59% (due to facilities unfit-for-purpose e.g. substandard indoor sports courts).
Parking Revenue - The percentage increase in parking revenue	Increase the City's revenue from parking by 10% each year	10	0	There is an increase of 6.9 % between this period vs same period in 2025. Year to Date there is an overall decrease of 3% between in total revenue in comparing financial year 2024/25 and

				financial year 2025/26.
Compliance Audit Return Responses	Achieve 100% response compliance with the Compliance Audit Return submission requirements	100	0	Compliance Audit Return due 30 September 2026 outside of reporting period.

Quarter 1 - 2026/27 Planning Year

The following is the progress report for Q1 of the 2026/27 planning year.

2026/27 Corporate Business Plan – 1st Quarter Update Corporate Actions

The following table provides an overview of the progress of the 37 Corporate Actions scheduled for delivery in the CBP for 2026/27:

On Track	Complete	On hold
33 (89%)	4 (11%)	0 (0%)

The CBP Project/Activity Report for Q1 of 2026/27 is contained as **Attachment (c)** with City comments in the 'Quarterly Updates' column for each quarter.

2026/27 Corporate Business Plan – 1st Quarter Update Key Performance Indicators

The following table provides an overview of the progress of the 35 Key Performance Indicators (KPI's / Measures of Success) included in the CBP:

Achieved	Not Achieved
29 (83%)	6 (17%)

The CBP KPI Report for Q1 of 2026/27 is contained as **Attachment (d)** with City comments in the 'Result Comment' column when a KPI is not achieved.

The following table extracts information from this Report in relation to KPIs that were Not Achieved:

KPI Description	Performance Measure	2026 / 27 Target	Result	Result Comment
Event Attendee Targets	Obtain the targeted number of 10,000 people per annum at community events delivered by the City and partnering organisations	2,500 (per Qtr)	447	Attendance figure FOR Qtr1 26/27 includes Evolve Winter Program, NAIDOC flag raising ceremony, and September Citizenship Ceremony.

Facility Capital Projects delivered on time	95% delivered on time	95	75	Facility capital projects are on track to be delivered on time in accordance with projects scheduled for the financial year.
Footpath Maintenance Request response time	The percentage of footpath maintenance requests that are responded to within 3 days	90	89.1	123 out of 138 requests received for Q1 2026/27 resolved within the timeframes.
Development Application Determination	Maintain a minimum of 85% of development applications determined within statutory timeframes	85	82	A number of Officers were on leave during this quarter and there were a high number of applications lodged.
Customer Service (VoC) Improvement actions	12 improvement actions are agreed with business units in response to the results of the VoC surveys each year	3	0	KPI under review.
Closure of Audit Recommendations	Achieve closure of at least 50% of recommendations	12.5	0	Current methodology for measuring this KPI is under review to ensure more accurate reflection of performance trends.

Consultation

Nil.

Policy and Legislative Implications

Local Government (Administration) Regulations 1996.

Financial Implications

The majority of projects and activities listed in the CBP Quarter 1 update are fully funded within the 2026/27 Annual Budget.

In respect to Community Infrastructure, a CBP project relates to the Challenger Reserve Masterplan as follows – '*Develop the detailed design, cost estimates and undertake stakeholder and community engagement to progress the Challenger Reserve Masterplan.'* Council has previously resolved to consider a funding allocation towards the detailed design of the Challenger Reserve Pavillion as part of the 2026/27 mid-year budget review.

Key Risks and Considerations

Risk Event Outcome	**Reputational Damage** Deals with adverse impact upon the professional reputation and integrity of the City and its representatives whether those persons be appointed or elected to represent the City. The outcome can range from a letter of complaint through to a sustained and co-ordinated representation against the City and or sustained adverse comment in the media.
Risk rating	Medium
Mitigation and actions	Performance management by: 1. Annual business planning with business units to identify new actions for the financial year. 2. Monitor progress of SCP through a. Quarterly reporting of the Corporate Business Plan (CBP) Corporate Actions; b. Quarterly Key Performance Indicator reporting of CBP measures of success; and 3. Implementation of Audit findings in accordance with the Audit Register Progress Report.

Strategic Implications

This matter relates to the following Strategic Direction identified within Council's Strategic Community Plan 2021-2031:

Strategic Direction:	Leadership
Aspiration:	A local government that is receptive and proactive in meeting the needs of our community
Outcome:	4.3 Good governance
Strategy:	4.3.4 Maintain a culture of continuous improvement

Attachments

6.4 (a):	Quarter 4 2025-26 CBP Project Status Updates
6.4 (b):	Quarter 4 2025-26 CBP KPI Status Updates
6.4 (c):	Quarter 1 2026-27 CBP Project Status Updates
6.4 (d):	Quarter 1 2026-27 CBP KPI Status Updates

6.5 RISK MANAGEMENT, BUSINESS CONTINUITY AND WORK HEALTH AND SAFETY - QUARTER ONE ACTIVITY REPORT

File Ref: D-26-16847
Reporting Officer(s): Anita Amprimo, Acting Chief Executive Officer

Summary

This report outlines recent activities undertaken by the City of South Perth relating to Risk Management, Business Continuity and Workplace Health and Safety and an overview of the activities planned.

Officer Recommendation

That the Audit, Risk and Improvement Committee:

1. Notes the details of the Quarterly Activity Report as contained in the body of the report; and
2. Notes the WHS Corporate Operational Risk as escalated.

Background

The Council is responsible for the strategic direction of the City. The City's Audit, Risk and Improvement Committee (ARIC) is a Committee of Council in accordance with the *Local Government Act 1995* (the Act) and is responsible for providing guidance, assistance and oversight to the Council, in relation to matters which include the City's compliance with Regulation 17 of the *Local Government (Audit) Regulations 1996* (the audit regulations).

The responsibility of the Chief Executive Officer (CEO) in relation to Regulation 17 of the audit regulations includes reviewing the appropriateness and effectiveness of the City's systems and procedures in relation to:

- Risk management;
- Internal control; and
- Legislative compliance.

This activity report will provide an update on the City's Risk Management, Business Continuity and Workplace Health and Safety activities undertaken for the previous quarter and identifies proposed activities for the upcoming quarter.

Information contained in this report will assist the ARIC in fulfilling their responsibilities as they relate to Regulation 17 of the audit regulations.

Comment

1System Risk Management Implementation

The ARIC is advised that the City is preparing for the implementation of 1System Risk Management module, which will become the City's central system for managing and reporting Strategic, Operational and Business Unit risks. The system will improve visibility of risk information, support more effective monitoring of risk treatments and actions, and provide a clearer and more efficient mechanism for the escalation and reporting of risks. Internal business units are currently reviewing and updating their current risk information for incorporation into the new system.

Operational Risk Register

In accordance with the Risk Management Framework 2024, all operational risks with a residual risk rating of High or Extreme are reported to the ARIC.

At its meeting held 23 April 2026, the Internal Risk Management Committee considered a Work Health and Safety (WHS) Business Unit-level risk relating to psychological illness and injury which was assessed having a consequence rating of 3 and a likelihood rating of 4, resulting in a residual risk rating of 12 (High). The risk was subsequently reported to ARIC at its 16 June 2026 and 15 September 2026 meetings and was reassessed by the Internal Risk Management Committee at its meetings held on 5 August 2026 and 6 October 2026, with the risk rating remaining unchanged at High.

At the Internal Risk Management Committee held 6 October 2026, the Committee also considered risk associated with employee attraction and retention. Whilst the risk rating remains medium and is therefore not required to be reported, the City notes difficulties in attracting and retaining employees for procurement and contract management, and governance. The City will reconsider the risk depending on the outcomes of recruitment activities that are currently progressing in this respect.

It is noted that whilst this report presents risks up until the 6 October 2026 Internal Risk Management Committee, the City also continues to monitor current and emerging risks, and will provide updates to ARIC on any changes since the Committee at the next ARIC.

Business Continuity Plan

The City has developed an organisation-wide Business Continuity Plan (BCP) which was noted by ARIC at its 16 June 2026 meeting. The BCP details the City’s response to maintain continuity of service in the event of disruption such as natural hazards, human threat, technical hazards and industrial hazards.

The next phase of implementation involves testing and exercising the BCP to assess its effectiveness across a range of disruption scenarios, validate key response and recovery arrangements, evaluate the City's preparedness to respond to and recover from incidents, and identify opportunities for ongoing improvement.

As previously reported, preparation for a Business Unit desktop exercise is anticipated to commence by December 2026.

Work Health and Safety

The list below provides the WHS activities and initiatives that were undertaken during the last quarter ending 30 September 2026:

- The 2026/27 Annual WHS Targets and Objectives reviewed and approved by EMT in August 2025.
- An Animal Care Facility operations risk assessment was completed.

- A number of WHS related documents, procedures, inductions have been drafted and/or updated, related to:
    - Golf Course;
    - Verification of Critical Control;
    - Managing Aggressive and Suspicious Behaviour;
    - Bomb Threat;
    - Glyphosate; and
    - Policy.
- WHS received copy of external review of EV stations.
- Two internal WHS audits undertaken: Audit of Duress Alarms Inspection Regime and Management of Audiometric Testing Records, no major issues identified.
- Undertook an Emergency Evacuation Exercise of the South Perth Library in September 2026.

Consultation

Nil.

Policy and Legislative Implications

Local Government Act 1995
Local Government (Audit) Regulations 1996
Work Health and Safety Act 2020
Industrial Relations Regulations Amendment (Work Health and Safety) Regulations 2022
WHS Code of Practice

Financial Implications

All activities listed have been completed within allocated budget.

Key Risks and Considerations

Risk Event Outcome	**Legislative Breach** Refers to failure to comply with statutory obligations in the manner in which the City, its officers and Elected Members conduct its business and make its decisions and determinations. This embraces the full gamut of legal, ethical and social obligations and responsibilities across all service areas and decision making bodies within the collective organisation.
Risk rating	Low
Mitigation and actions	Setting and quantifying risk appetite. Ensuring risk management functions are resourced. Regular risk reviews and identifying potential risks before they occur so that impacts can be minimised and opportunities realised. Embedding risk practices into City operations.

Strategic Implications

This matter relates to the following Strategic Direction identified within Council's Strategic Community Plan 2021-2031:

Strategic Direction:	Leadership
Aspiration:	A local government that is receptive and proactive in meeting the needs of our community
Outcome:	4.3 Good governance
Strategy:	4.3.4 Maintain a culture of continuous improvement

Attachments

Nil.

6.6 POLICY REVIEW

File Ref: D-26-15713
Reporting Officer(s): Olaya Lope, Acting Director Infrastructure Services
Donna Shaw, Acting Director Corporate Services

Summary

The Terms of Reference of the Audit, Risk and Improvement Committee (ARIC) include responsibility for reviewing the City's policies and making a recommendation to Council for adoption.

Various policies are presented for consideration by the ARIC for review and referral to Council for adoption.

Officer Recommendation

That the Audit, Risk and Improvement Committee recommends to Council that it:

1. Adopts the following revised policies with minor amendments as shown in **Attachment (a):**

P605	Purchasing Policy
P202	Energy Conservation
P203	Ground Water Management
P204	Chemical Use
P207	Natural Areas
P209	Shade Structures
P210	Street Verges and Vegetation
P211	Water Sensitive Urban Design
P212	Waste Management
P357	Right of Way (ROW) Maintenance and Development
P401	Graffiti Management
P501	Paths – Provision and Construction
P502	Cycling Infrastructure
P510	Traffic Management Warrants
P648	Motor Vehicles

2. Adopts the following revised policies with substantive amendments as shown in **Attachment (b).**

P206	Urban Greening
P511	Road Thoroughfare Infrastructure Management
P692	Sustainability

3. Revokes the following policy as shown in **Attachment (c).**

P213	Phytophthora Management

Background

Section 2.7 of the *Local Government Act 1995* (Act) provides:

(1) The Council

(a) governs the local government's affairs; and

(b) is responsible for the performance of the local government's functions.

(2) Without limiting subsection (1), the Council is to —

(b) oversee the allocation of the local government's finances and resources; and

(c) determine the local government's policies.

Council is responsible for determining the strategic direction of the City. This is assisted by the adoption of Council policies reflecting this direction and guiding the City's decision-making processes.

Council policies should:

- Not duplicate legislation. If a policy conflicts with legislation, the legislation prevails.
- Be clear and concise.
- Not be overly prescriptive but rather provide guiding principles.
- Provide the City with clear direction to respond to issues and act in accordance with Council decisions and direction.
- Enable Council Members to adequately manage enquiries from external stakeholders relating to the role of Council in particular situations.
- Be separate from administrative management and operational procedures (which need to evolve to ensure continuous improvement).

The City reviews the policies on a progressive basis during the calendar year separated by Directorate. The policy review timeline for 2026 has been scheduled as follows:

Directorate	Meeting Cycle
Infrastructure Services	9 November ARIC Meeting

As part of the review process, policies were assessed and categorised as requiring no changes, minor administrative amendments, substantive amendments, or revocation.

Minor administrative amendments include updates to formatting, references, legislative citations and terminology that do not affect the policy's intent or operation. Substantive amendments are those that alter, or have the potential to alter, the policy's intent, scope, responsibilities or operational application.

Where amendments were proposed, the underlying drivers for change were identified, including legislative requirements, operational improvements, organisational changes, strategic alignment, audit or review findings, and other business needs. The potential impact of proposed changes on policy intent and effectiveness was also considered as part of the assessment.

Policies related to Infrastructure Services directorate are therefore presented for consideration. Policy P605 Purchasing has also been presented in this review, as further discussed in this report.

Comment

Minor Amendments

The policies listed below and shown at **Attachment (a)** are recommended with minor amendments shown by track changes in each document, with a summary of changes provided below.

P605 Purchasing Policy

P605 was adopted in 2005 and recently was reviewed in July 2026. It is proposed that the policy be further amended to provide additional clarity regarding Purchasing Exemptions (under $250,000). Specifically, this amendment would clarify that exemptions may only be granted by the Chief Executive Officer where it is inappropriate or not reasonably practicable to comply with the requirements of the policy, and where the total value of the purchase does not exceed $250,000. The policy will also specify the circumstances in which such exemptions may apply.

P202 Energy Conservation

This Policy was adopted in 2005 and was amended in December 2024. Reviews of the Policy were undertaken and presented to the Audit, Risk and Improvement Committee in November 2025, and referred to Council at its meeting held 16 December 2025.

Council resolved that this Policy be reviewed at a Council Workshop and accordingly this Workshop was held on 9 March 2026 to consider the remaining policies from Council Resolution 1225/243. This Policy was presented to Council at its meeting held 26 May 2026, where it was recommended that this policy be revoked. Alternatively, Council resolved that it defer consideration of the revocation of this Policy to the Ordinary Council Meeting to be held on 15 December 2026, to allow for further consideration through the Council Plan process.

As the Council Plan has been approved for Public Consultation at its meeting held 27 October 2026, the Policy has been reviewed and has been reassessed to be retained as amended. The policy reflects the City's commitment to the conservation of energy and the transition to more sustainable operations, including the conversion of internal combustion-powered plant and fleet to electric-powered alternatives and the reduction of fossil fuel consumption. Minor administrative amendments are proposed to remove outdated or irrelevant policy and key document references, while additional amendments are proposed to incorporate these commitments into the Policy Statement and ensure the policy remains current.

P203 Ground Water Management

P203 was adopted in 2005 and was amended in December 2024. Reviews of the Policy were undertaken and presented to the Audit, Risk and Improvement Committee in November 2025, and referred to Council at its meeting held 16 December 2025.

Council resolved that this Policy be reviewed at a Council Workshop and accordingly this Workshop was held on 9 March 2026 to consider the remaining policies from Council Resolution 1225/243. This Policy was presented to Council at its meeting held 26 May 2026, where it was recommended that this policy be revoked.

Alternatively, Council resolved that it defers consideration of the revocation of this Policy to the Ordinary Council Meeting to be held on 15 December 2026, to allow for further consideration through the Council Plan process.

As the Council Plan has been approved for Public Consultation at its meeting held 27 October 2026, the Policy has been reviewed and has been reassessed to be retained as amended. Minor administrative amendments are proposed to clarify requirements for developments involving basement construction, including dewatering management, independent technical review, and the assessment of potential groundwater impacts.

P204 Chemical Use

Policy P204 was adopted in 2001 and last reviewed in December 2024. Minor administrative amendments are proposed to update references to Work Health and Safety procedures, ensuring the policy remains current while continuing to support effective asset management, environmental protection, and the prevention of pollution, injury and disease.

P207 Natural Areas

This Policy was adopted in 2002 and last reviewed in April 2024. Minor administrative amendments are proposed to update references and align the Policy with the adopted Urban Greening Strategy 2025-2050, ensuring it reflects the City's objectives for biodiversity conservation, urban greening and climate resilience.

P209 Shade Structures

P209 was adopted in 2005. Reviews of the Policy were undertaken and presented to the Audit, Risk and Improvement Committee in November 2025, and referred to Council at its meeting held 16 December 2025.

Council resolved that this Policy be reviewed at a Council Workshop and accordingly this Workshop was held on 9 March 2026 to consider the remaining policies from Council Resolution 1225/243. This Policy was presented to Council at its meeting held 26 May 2026, where it was recommended that this policy be amended. Minor administrative amendments are proposed to update references to the adopted Urban Greening Strategy 2025-2050 and reinforce the City's preference for natural shade provided by trees as the primary method of shade provision, with artificial shade structures to be considered where natural shade is not feasible or does not provide adequate coverage. These changes do not alter the policy's intent or objectives.

P210 Street Verges and Vegetation

This Policy was adopted in 2005 and last reviewed in April 2025. Minor administrative amendments are proposed to align the policy with the Urban Greening Strategy 2025-2050, reinforcing the City's commitment to retaining and expanding urban tree canopy and promoting climate-resilient streetscapes. The changes also ensure the policy continues to provide clear and consistent criteria for the removal and replacement of street trees.

P211 Water Sensitive Urban Design

This Policy was adopted in 2013 and last reviewed in December 2024. Minor administrative amendments are proposed to improve the clarity and consistency of the policy's wording.

The policy establishes mandatory requirements for incorporating Water Sensitive Urban Design into land use planning, development, infrastructure, public open space, streetscapes and City operations. The proposed amendments are administrative in nature and do not alter the intent, scope or application of the policy.

P212 Waste Management

This Policy was adopted in 2016 and last reviewed in 2024. It provides for an efficient and comprehensive waste disposal service for the City's residents and ratepayers, including multi-residential developments and approved commercial properties, as well as an economical, best-practice verge and kerbside collection service for residential properties within the City. Minor administrative amendments are proposed, including greater emphasis on the City's waste service education, awareness, and community engagement initiatives.

P357 Right-of-Way (ROW) Maintenance and Development

This Policy was adopted in 2002 and last reviewed in December 2024. Minor administrative amendments are proposed to improve clarity, consistency and document usability, while preserving the existing policy intent.

The policy provides a consistent, transparent and risk-based framework for the maintenance, renewal, improvement and development of rights-of-way retained for unrestricted public access. It establishes principles relating to eligibility, service levels, technical standards, funding, prioritisation, governance and delivery, while recognising that it does not independently authorise expenditure or works outside adopted budgets, delegations or administrative authority.

The proposed amendments are administrative in nature and do not alter the policy's intent, scope or application. The changes will improve clarity, consistency, document control, accessibility and the accuracy of cross-references. No changes are proposed to eligibility criteria, funding responsibilities, construction standards or project prioritisation.

P401 Graffiti Management

P401 was adopted in 2002 and last reviewed in December 2025. The policy recognises that graffiti vandalism is a costly community issue with financial, environmental and social impacts. Minor administrative amendments are proposed to improve clarity regarding the City's roles and responsibilities in graffiti management. The proposed changes clarify the scope of the City's involvement and remove activities that are more appropriately undertaken by other agencies, while maintaining the policy's intent and commitment to addressing graffiti within the community.

P501 Paths – Provision and Construction

This Policy was adopted in 2002 and last reviewed in April 2024. Minor administrative amendments are proposed to improve clarity, consistency and alignment with current standards, while maintaining the existing policy intent.

The policy establishes the minimum standards for the planning, provision, construction, renewal and management of paths within the City to support a safe, accessible, connected and sustainable path network.

The proposed amendments are expected to improve drafting clarity, document control, reference accuracy, accessibility alignment and consistency in decision-making. The amendments are administrative in nature and do not alter the overarching objectives of the policy. Any operational impacts arising from the review will be subject to the outcomes of the technical assessment of path widths, material requirements, network provision and the application of contemporary standards.

P502 Cycling Infrastructure

P502 was adopted in 2002 and last reviewed in April 2024. Minor administrative amendments are proposed to improve clarity, consistency and the accuracy of referenced documentation, while maintaining the existing policy intent.

The policy supports the planning, provision and management of a safe, connected, accessible and sustainable cycling network that encourages cycling, improves connectivity to key destinations, and promotes healthy and sustainable transport choices.

The review identified several administrative amendments to update dated technical references and ensure alignment with current guidance documents. References to Austroads, Main Roads Western Australia, State planning guidance and the City's Strategic Community Plan will be updated and standardised where required. Minor drafting amendments are also proposed to improve clarity, ensure consistent terminology and remove ambiguity. These changes are administrative in nature and do not alter the policy's intent.

P510 Traffic Management Warrants

P510 was adopted in 2005 and last reviewed in December 2024. Minor administrative amendments are proposed to improve clarity, consistency and readability, while maintaining the existing policy intent. The policy ensures requests for traffic management and traffic calming measures within the City are assessed fairly and consistently.

The proposed amendments will update terminology, improve drafting, clarify responsibilities and ensure references are accurate and current. The amendments are administrative in nature and do not alter the policy's objectives, scope, assessment criteria or decision-making framework.

P648 Motor Vehicles

This Policy was adopted in 2009 and last reviewed in July 2026. The policy outlines the principles for the procurement, allocation, operation and disposal of the City's light vehicle fleet, ensuring vehicles are managed in a safe, fit-for-purpose, financially responsible and environmentally sustainable manner. Minor administrative amendments are proposed as an operational improvement to provide greater clarity regarding the criteria applied to new light vehicle purchases. These changes will support consistent decision-making and implementation of the policy while maintaining its existing intent and objectives.

Substantive Amendments

The policies listed below and shown at **Attachment (b)** are recommended for review with substantive amendments shown by track changes in each policy, with a summary of changes provided below.

P206 Urban Greening

Policy P206 was adopted in 2002 and was last reviewed by Council at its meeting held 26 May 2026. Council endorsed the revisions to the Policy and also requested the Chief Executive Officer presents updates to the Policy by no later than December 2026. Major amendments proposed align with the policy with the City's Urban Greening Strategy, strengthen protections and decision-making criteria for tree removal on public land, and introduce guidance for tree planting on public land in response to Council Decision 0725/140. These changes provide a clearer framework for the management and enhancement of the City's urban greening principles.

P511 Road Thoroughfare Infrastructure Management

This Policy was adopted in 2019 and last reviewed in April 2024. The policy establishes clear, consistent and transparent principles for managing activities, works, occupation and infrastructure within road reserves, thoroughfares and roadside verges under the care, control and management of the City of South Perth.

Major amendments are proposed following a comprehensive review to establish a clearer governance framework for the management of road reserves and thoroughfares. The revisions separate Council policy principles from operational and technical requirements, clarify the relationship with legislation and delegated authority, strengthen procedural fairness and accountability, and establish clearer requirements for risk management, accessibility, asset protection, environmental outcomes and lawful cost recovery.

The revised policy retains the existing intent of managing City-controlled road reserves and thoroughfare infrastructure in the broader community interest, while strengthening and clarifying the framework through which that intent is administered. The proposed changes are expected to provide clearer decision-making authority, more consistent and transparent assessment processes, stronger public safety, accessibility, asset protection and environmental outcomes, lawful cost recovery, improved recordkeeping and accountability, and reduced need for future Council policy amendments when operational or technical requirements change.

P692 Sustainability

This Policy was adopted in 2008 and last reviewed in May 2026. Council endorsed the revisions to the Policy, and also requested the Chief Executive Officer presents updates to the Policy by no later than December 2026. The policy outlines the City's commitment to sustainability by enhancing the quality of life and prosperity of the community and seeking to prevent harmful local and global impacts through responsible planning and decision-making. The policy seeks to embed economic, social and environmental sustainability into the City's strategic and operational planning, incorporate climate change risk assessment and adaptation into planning and service delivery, and promote long-term decision-making that considers future impacts.

Major amendments are proposed to expand the policy objectives and policy statement to reflect the 2023 amendments to the *Local Government Act 1995*, which recognise the promotion of economic, social and environmental sustainability, planning for and mitigating climate change risks, and considering long-term impacts on future generations as important functions of local government.

The proposed amendments will improve consistency with the requirements of the *Local Government Act 1995* while retaining the policy's overarching commitment to sustainable outcomes for the community.

Revocation

The policy listed below and shown at **Attachment (c)** is recommended for revocation by Council.

P213 Phytophthora Management

This Policy was adopted in 2017 and last reviewed in April 2024. Revocation is proposed, with its strategic intent to be incorporated into the City's Urban Greening Policy and its operational requirements to be managed through the Dieback Management Procedure.

The policy is predominantly operational in nature, with most provisions relating to day-to-day management practices and operational controls. The City already maintains a dedicated Dieback Management Procedure, which is a more appropriate mechanism for prescribing and managing these requirements.

In addition, *Phytophthora dieback* represents one of several threats to biodiversity and urban greening outcomes. The strategic objectives of the policy can be more effectively addressed through a broader policy framework focused on biodiversity conservation, urban greening, ecological resilience and environmental asset management, rather than through a stand-alone policy addressing a single disease.

It is recommended that the proposed changes to the policy framework are adopted.

Consultation

Policies with substantive changes were presented at the Council Workshop held on 13 October 2026.

Following the decision of Council on 16 December 2025, a policy review workshop was held with Council on 9 March 2026 to consider amendments to several policies in this review.

Policy and Legislative Implications

Local Government Act 1995

Financial Implications

Nil.

Key Risks and Considerations

Risk Event Outcome	**Legislative Breach** Refers to failure to comply with statutory obligations in the manner in which the City, its officers and Elected Members conduct its business and make its decisions and determinations. This embraces the full gamut of legal, ethical and social obligations and responsibilities across all service areas and decision making bodies within the collective organisation.
Risk rating	Low
Mitigation and actions	Review of all City policies on an annual basis.

Strategic Implications

This matter relates to the following Strategic Direction identified within Council's Strategic Community Plan 2021-2031:

Strategic Direction:	Leadership
Aspiration:	A local government that is receptive and proactive in meeting the needs of our community
Outcome:	4.3 Good governance
Strategy:	4.3.1 Foster effective governance with honesty and integrity and quality decision making to deliver community priorities

Attachments

6.6 (a):	Minor Amendments
6.6 (b):	Substantive Changes
6.6 (c):	Revocation

6.7 COUNCIL RESOLUTION TRACKING

File Ref: D-26-16174
Reporting Officer(s): Anita Amprimo, Acting Chief Executive Officer

Summary

This report provides the Audit, Risk and Improvement Committee with an update on the status of Council Resolutions.

Officer Recommendation

That the Audit, Risk and Improvement Committee notes the contents of this report.

Background

A Status Report on Council Resolutions is maintained and available on the City's website for the period 2021 to 2026.

A report is provided to each Audit, Risk and Improvement Committee (ARIC) meeting detailing Council resolutions and their status.

The Council Resolutions Register is managed as follows:

- After a Council Meeting, each resolution is entered on the Register.
- Each resolution is assigned to the relevant Manager/Director.
- The resolution is marked as in progress or completed.
- Items that have been completed are shown in green.
- Items that are not completed or are in progress are shown in red.

Comment

At the ARIC meeting held 15 September 2026, the ARIC was presented with a report on Council Resolutions made in the previous quarter and their status.

Since the last report to the ARIC, the City held three Ordinary Council Meetings and one Special Council Meetings.

The Resolutions from the Ordinary Council Meeting held 27 October 2026 and any meetings held after this date are not included in this report due to the proximity to the creation of this Agenda.

The table below details the number of Council Resolutions that were made at each meeting and their status:

Meeting Date	Number of Resolutions	Status
14 August 2026 (Special)	2	2 completed
25 August 2026	18	17 completed 1 in progress
29 September 2026	16	15 completed 1 in progress

This Register is presented as **Attachment (a)**.

In Progress Resolutions

At the last ARIC meeting held 15 September 2026, 13 resolutions were noted as in progress. Commencing from this meeting, the 2024 outstanding resolutions have also been incorporated into the reporting process. Accordingly, these resolutions are incorporated and presented at **Attachment (b)** with eight resolutions are now completed, with nine in progress.

Consultation

Resolutions are marked as in progress or complete by the responsible officer.

The Register is reviewed regularly by the Executive Management Team.

Policy and Legislative Implications

Local Government Act 1995

Financial Implications

Nil.

Key Risks and Considerations

Risk Event Outcome	**Legislative Breach** Refers to failure to comply with statutory obligations in the manner in which the City, its officers and Elected Members conduct its business and make its decisions and determinations. This embraces the full gamut of legal, ethical and social obligations and responsibilities across all service areas and decision making bodies within the collective organisation. **Reputational Damage** Deals with adverse impact upon the professional reputation and integrity of the City and its representatives whether those persons be appointed or elected to represent the City. The outcome can range from a letter of complaint through to a sustained and co-ordinated representation against the City and or sustained adverse comment in the media.
Risk rating	Low
Mitigation and actions	Council Resolutions are maintained in a register and there is visibility and accountability of the Register through the ARIC, Council and on the website. They are reviewed regularly by the Executive Management Team.

Strategic Implications

This matter relates to the following Strategic Direction identified within Council's Strategic Community Plan 2021-2031:

Strategic Direction:	Leadership
Aspiration:	A local government that is receptive and proactive in meeting the needs of our community
Outcome:	4.3 Good governance
Strategy:	4.3.1 Foster effective governance with honesty and integrity and quality decision making to deliver community priorities

Attachments

6.7 (a):	Quarterly Status Report
6.7 (b):	In Progress Resolutions

7. MEETING CLOSED TO THE PUBLIC

The Acting Chief Executive Officer advises that there is a matter for discussion on the Agenda for which the meeting may be closed to the public, in accordance with section 5.23(4) (a) of the *Local Government Act 1995.*

MATTERS FOR WHICH THE MEETING MAY BE CLOSED

Officer Recommendation

That the following Agenda Item be considered in closed session, in accordance with s5.23(4)(a) of the *Local Government Act 1995*:

7.1 Strategic Internal Audit Plan Update

7.1 Strategic Internal Audit Plan Update

This item is considered confidential in accordance with section 5.23(4)(a) of the Local Government Act 1995 as it contains information relating to "legal advice, or other information, over which the local government holds legal professional privilege"

File Ref: D-26-16924
Reporting Officer(s): Anita Amprimo, Acting Chief Executive Officer

8. CLOSURE