

Audit, Finance & Risk Committee

12 December 2024

Report for Agenda Item | Rīpoata moto e Rāraki take [1]

Department: Assurance, Finance & Risk

Title | Taitara: Risk and Compliance Update December 2024

Purpose of the Report | Te Take mō te Pūroko

The purpose of this report is to provide a governance update regarding the status of the Queenstown Lakes District Council (QLDC) risk and compliance context, an update on the development of QLDC's insurance strategy, and the overall programme of works being undertaken within the Risk and Compliance Team.

Executive Summary | Whakarāpopototaka Matua

During the reporting period, the Risk and Compliance Team commenced second quarter (Q2) risk review meetings with Tier 3 Managers to identify emerging risks, review existing risks, and document treatment plans. At these meetings external compliance obligations (legislative requirements) were also discussed with Managers. The Risk and Compliance Team will continue to meet regularly (approximately every 3 monthly) with Tier 3 Managers and Organisation Units to update risks and develop treatment plans based on priority.

At the time of writing, the TechOne Risk Register has 34 Tier 1 Risks, 396 Tier 2 Risks, 109 treatment plans, associated with 93 risks, with 65 identified controls, of which 44 controls have been fully implemented. **Attachment A** provides a summary of Tier 1 risks recorded in the TechOne Risk Register.

This report provides an overview of significant changes to the Council risk context. During this reporting period the Freedom Camping Bylaw 2021 was quashed by the High Court, risks were identified regarding a tender for Parks Maintenance Services, Waka Kotahi determined that it was retiring the Management Code of Practice for Temporary Traffic Management and QLDC was the target of a Malicious Cyber Activity affecting VPN (Virtual Private Networking).

The Risk and Compliance Team has taken ownership of the Protected Disclosures (Protection of Whistleblowers) Policy (the Policy) from People & Capability. The Policy has been reviewed and updated to ensure it is fit for purpose and to reflect the Protected Disclosures (Protection of Whistleblowers) Act 2022, which has come into force since the previous version of the Policy was adopted. Additional reporting guidance and associated tools have also been developed. Attachment B is the proposed updated Protected Disclosures (Protection of Whistleblowers) Policy, which replaces the existing Policy. It is recommended that the Audit, Finance & Risk Committee (AFRC) recommend that Council adopts the proposed Policy and revoke the existing Policy.

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In October, an updated version of QLDC's Compliance Register for mandatory external (Legal) obligations was received from legal firm Wynn Williams. The Compliance Register contains approximately 1,000 obligations from legislation, bylaws, and policies. Since the Obligations Register was last reviewed changes have been made to 27 statutes within the register, and 9 statues have been added. The register was circulated to Tier 3 Managers for information and review. Control planning will be undertaken as part of regular risk management practices, and the Risk and Compliance Team will discuss compliance with organisational units at quarterly risk management meetings. The review of the Obligations Register has been undertaken in conjunction with a review of the Delegations Register. Updates to the Delegations Register are managed by the Stakeholder & Democracy Services Team, and considered by Council where appropriate.

In December 2023, the Risk and Compliance Manager reported to AFRC his findings and associated recommendations regarding the financial risks associated with the Queenstown Airport Corporations (QAC) draft Masterplan. The AFRC noted the report and recommended to Council the associated risk mitigation measures outlined in the report. The recommendations included QLDC's approval of QAC's capital reporting framework. As per the Council's 2024 Statement of Expectations (approved 14 December 2023) and the corresponding QAC's Statement of Intent (year ending 30 June 2025), in December 2024, QAC provided QLDC an overview of the proposed Master Plan 2023 capital delivery programme project gateways and exception reporting framework to the Risk and Compliance Manager for review.

Overall, the Risk and Compliance Manager considers QAC's proposed Capital Reporting Framework to be good practice, and although clarification will be sought on a small number of minor matters, that does not materially impact upon whether the approach is considered appropriate. The Risk and Compliance Manager therefore recommends QAC's Capital Reporting Framework to the AFRC, as a means of providing assurance to QLDC regarding the management of financial risk associated with the QAC's Masterplan.

Recommendation | Kā Tūtohuka

That the Audit, Finance & Risk Committee:

- Note the contents of this report;
- 2. **Recommend** to Council that it adopts the proposed Protected Disclosures (Protection of Whistleblowers) Policy and Revoke the existing Policy (March 2017):
- 3. **Recommend** to Council that it approves Queenstown Airport Corporation's proposed framework for Capital reporting



Prepared by:

Reviewed and Authorised by:

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Fitle: Risk & Compliance Manager

14 November 2024

Name: Katherine Harbrow

Title: GM Assurance, Finance & Risk

14 November 2024

Context | Horopaki

1. This report seeks to support the governance role of the Audit, Finance & Risk Committee (AFRC) by providing updates on the following topics:

- A. QLDC Risk Management Framework and Work Programme
- B. Significant Changes to Council Risk Context/update on treatment planning
- C. Compliance Obligation Register
- E. Protected Disclosures (Protection of Whistleblowers) Policy
- F. Queenstown Airport Corporation Capital Reporting Framework

Analysis and Advice | Tatāritaka me kā Tohutohu

- 2. The purpose of this report is to provide a governance update regarding the status of the Queenstown Lakes District Council (QLDC) risk and Compliance context, an update on the development of QLDC's insurance strategy, and the overall programme of works being undertaken within the Risk and Compliance Team. The intent of this report is to provide advice and obtain feedback and guidance from AFRC, in accordance with the objectives of the Committee, including assisting the Committee to discharge its responsibilities for:
 - the robustness of the internal control framework and financial management practices;
 - the integrity and appropriateness of internal reporting and accountability arrangements;
 - the robustness of risk management systems, processes and practices;
 - compliance with applicable laws, regulations;
 - standards and best practice guidelines; and
 - the establishment and maintenance of controls to safeguard the Council's financial and nonfinancial assets.
- 3. This report also outlines changes that are proposed to be incorporated into a much-revised Protected Disclosures (Protection of Whistleblowers) Policy, which incorporates the



requirements of the Protected Disclosures (Protection of Whistleblowers) Act 2022, which replaced the Protected Disclosures Act 2000. The existing Protected Disclosures (Protection of Whistleblowers) Policy was adopted in 2017.

A. QLDC Risk Management Framework and Work Programme

- 4. Since the last report, the Risk and Compliance Team has commenced second quarter (Q2) risk review meetings with Tier 3 Managers to identify emerging risks, review existing risks, and document treatment plans. At these meetings external compliance obligations (legislative requirements) were also discussed with managers. The Risk and Compliance Team will continue to meet regularly (approximately every 3 monthly) with Tier 3 Managers and Organisation Units to update risks and develop treatment plans based on priority. Given the number of meetings held (28 per quarter) these meetings are effectively continuous throughout the year.
- 5. At the time of writing, the TechOne Risk Register has 34 Tier 1 Risks, 396 Tier 2 Risks, 109 treatment plans, associated with 93 risks, with 65 identified controls, of which 44 controls have been fully implemented. As summarised in **Attachment A**, of 34 Tier 1 Risks, two have a residual risk rating that is 'very high'; RISK10013 'unexpected change in cost or funding' and RISK10021 'Ineffective operations, maintenance or renewal of property or infrastructure assets leading to failure(s)'.
- Both RISK10013 and RISK10021 have treatment plans in place, with current and future controls to mitigate the level of risk exposure. The relevant controls that have been implemented for RISK10013 and RISK10021 were outlined in the September 2024 Risk & Compliance update to AFRC.
- 7. Further upgrades to the Risk Register are due to be implemented later this year, although are currently on-hold due to other technology priorities. These upgrades will provide for better workflow, enabling risk owners and responsible officers to better manage their own risks and associated documentation of treatment planning. Currently, many treatment plans are summarised in the TechOne Risk Register (often with documents attached), with more detailed information being held elsewhere (e.g. Sentient PPM, QLDC's 'Portfolio Program Management' system).
- 8. The Risk Management Policy is currently under review and the Risk and Compliance Manager will seek guidance from the Risk Strategy Group and Executive Leadership Team on the following, before seeking recommendations from AFRC on updates to the Risk Management Policy to:
 - Reflect risk hierarchy and the interrelationships between risks
 - Incorporate a 'three lines of defence model/three lines model' into the Risk Management Framework
 - Provide a renewed understanding of risk appetite and its definition and representation (activity currently underway)

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- Following the consideration of the above by AFRC, it is intended that a Council workshop will be held for elected members to provide feedback on a proposed draft Risk Management Policy, prior to it being considered for adoption by Council.
- 10. The Risk and Compliance Manager will seek guidance from the Risk Strategy Group and Executive Leadership Team on the following, before seeking recommendations from AFRC:
 - the development and implementation of an appropriate Compliance Framework and associated Compliance Policy. Within the broader risk management framework, a compliance framework would establish the elements of a compliance management programme defining responsibilities for external mandatory (legal) obligations, external voluntary obligations that QLDC has chosen to comply with, and internally imposed obligations including, but not limited to QLDC policies.

B. Significant Changes to Council Risk Context/update on treatment planning

NEW RISK Lack of, or ineffective bylaw to regulate local matters (description under review) - Freedom Camping Bylaw 2021 quashed by the High Court, limiting enforcement options for the management of freedom camping on QLDC owned and managed land until a new bylaw is adopted.

- 11. The QLDC decision to adopt the Freedom Camping Bylaw 2021 (2021 Bylaw) has been quashed by the High Court, following a judicial review challenge by the New Zealand Motor Caravan Association (NZMCA). The 2021 Bylaw is quashed as of 20 September 2024, and QLDC stopped enforcement of the bylaw from this date onward.
- 12. Freedom camping and its impact locally has historically been a topic of high interest to the Queenstown Lakes community, particularly since the introduction of the Freedom Camping Act 2011 (FCA). The FCA is permissive of freedom camping in a self-contained motor vehicle or in a tent by default, that is freedom camping in is permitted in any local authority area, unless it is restricted or prohibited by legislation, including regulations and other secondary legislation, or a bylaw.
- 13. The 2021 FC Bylaw was QLDC's most recent bylaw adopted to manage freedom camping in the district. The 2021 FC Bylaw was developed to mitigate the potential risks of freedom camping, with the objectives of supporting community wellbeing and safety, protecting the environment and community areas so that everyone can enjoy them.
- 14. Work on a new freedom camping bylaw has started; indicative timing for completion of the new bylaw is late 2025.
- 15. A cross-organisational working group has been established to support development of a new freedom camping bylaw, to deliver a communication and education campaign about responsible camping, and to consider other enforcement options available to manage freedom camping on QLDC owned or managed land until a new bylaw is in place. The 2024-2025 Responsible Camping Programme includes recruitment of a team of Summer Ambassadors (working district-wide from



late November through to April) tasked with engaging with visitors, collecting data and reporting issues, heading to popular freedom camping spots to share information on how to camp responsibly, local expectations and promoting local campgrounds.

RISK10013 'Unexpected Change in Cost or Funding' - Parks Maintenance Contracts

- 16. Existing Parks Maintenance Contracts (3) expire on 30 June 2025. QLDC is required to undertake a full open market procurement process for the next Maintenance Contracts in accordance with the Procurement Policy.
- 17. Existing Maintenance Contracts were awarded in FY2017/18. Initial minimum terms of 5 years were entered into with a 3-year extension available if the contractors performed according to their own specific performance model. All three extensions were awarded in FY2021/22.
- 18. The existing contracts include terms and conditions that limit cost escalations annually (inflation) at an average of 3.5% with a low of 0% and circa 5% at its highest.
- 19. After 8 years, a re-engagement of the commercial market means that Council is exposed to parks maintenance contract tenders responding with prices in excess of allocated budget to deliver QLDC's business requirements.
- 20. Resolving this anticipated deficit will require effective procurement planning, and should this be insufficient to mitigate the risk to an acceptable level, consideration might need to be given to the following:
 - Additional budget
 - Reviewing QLDC's business requirements
 - Increasing revenue
 - A combination of the above including seeking new efficiencies in how QLDC delivers its business requirements.
- 21. A report will be presented to the Council in December 2024 to seek approval for the associated procurement plan. Pending Council's endorsement, the following timeframe for the tender is planned:
 - Tender Documents will be live on GETS in January 2025.
 - Tender Evaluations in March.
 - Contract award in April.
 - Contract start July 2025.
- 22. A further evaluation of tendered prices once received against confirmed budget is recommended in March to consider what mitigation measures (if any) are required, as outlined in Paragraph 20 above.

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RISK10048 Health, safety or wellbeing incident affecting member of the public – Waka Kotahi Retiring the Management Code of Practice for Temporary Traffic Management, CoPTTM

- 23. From 1 November 2024 the New Zealand Transport Agency Waka Kotahi (NZTA), is retiring the Traffic Management Code of Practice for Temporary Traffic Management, CoPTTM (The Code) across all its state highway network, and adopting a new guide, named the New Zealand Guide to Temporary Traffic Management, NZGTTM (The Guide).
- 24. The Code is currently used by all Territorial Authorities in New Zealand to meet their regulatory obligations, including the Health and Safety at Work Act 2015. The Code is currently the best practice reference for the safe and efficient management and operation of temporary traffic management (TTM) on all roads in New Zealand.
- 25. The Guide, however, outlines how to use a risk-based approach to plan and mitigate the risks to road workers and road users to keep them safe. The major difference being that The Guide no longer gives explicit requirements for TTM. Rather, it places the accountability to identify and manage risks on the Person Conducting a Business or Undertaking (PCBU), which aligns TTM practice with the Health and Safety at Work Act 2015. Specifically, the Guide approach requires PCBU's to develop site specific risk assessments and Traffic Management Plans (TMP). These documents are required to be peer reviewed before applying to the Territorial Authority.
- 26. Along with the retirement of The Code, NZTA has also announced it will cease administration and registration of most TTM warrants. Under The Code, workers must have the appropriate warrants to be able to work in TTM roles. The change means that NZTA no longer provides Council with this level of reassurance for worker competency.
- 27. Finally, what is not changing, is Council's jurisdiction over our road corridor through the Road Corridor Manager (RCM) under the provisions of the Local Government Act 1974 & 2002, Utilities Access Act 2010, Health and Safety at Work Act 2015, and QLDC's Traffic and Parking Bylaw. As such QLDC continues to have sole discretion over who it permits to work within its road corridor via a Corridor Access Request (CAR) permit.
- 28. The move by NZTA to discontinue warranting TTM roles, leaves the decision to determine which workers are competent and capable to work on the road up to each PCBU. While there are already NZQA level qualifications for most TTM roles, this is not the only way a PCBU can assure themselves that their people are competent. As a result, there is risk that during this transition away from warranting, that a PCBU fails to meet its obligations, and a worker with insufficient competency is working on QLDC's road corridor or designs an unsafe TMP.
- 29. The move to discontinue The Code, is likely to result in a PCBU submitting a TMP to Council, that while possibly appropriate, would have not previously been in accordance with the explicit diagrams from The Code. As a result, Council needs to consider its own tolerance to risk in allowing TMPs that differ from the existing industry norms. (Please note The Code did allow for exceptions from diagrams through a process known as an engineering exception decision).

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- 30. QLDC has communicated what it is doing in response to the local TTM industry, by way of a bulletin and flowchart. It is QLDC's expectation that TMPs will still be in accordance with The Code, and if a deviation is proposed, a full explanation is provided to the Road Corridor Manager. QLDC will also continue to use the auditing tools from The Code for monitoring the performance of all worksites and the implementation of TMPs, including those operating under a NZGTTM based TMP. Given the pending changes and retirement of the NZTA warrant card system for TTM qualifications, QLDC will recognise the current expiry date of the warrant cards held by traffic management staff as proof of competency and training until they expire.
- 31. Looking ahead, it will be up to each PCBU to determine who is sufficiently trained and capable to work in a particular environment of road. Unit standard training and assessment may contribute to this determination under the Health and Safety at Work Act 2015 (HSWA) have been met. To meet RCM obligations QLDC may request evidence of staff competency at any time during TMP development through to implementation.

RISK- 10025 Loss of integrity or theft of personal, commercially sensitive, confidential data (cyber security breach) - Malicious Cyber Activity affecting VPN (Virtual Private Networking)

- 32. On Thursday 7 November 2024, QLDC's Information and Communications Technology (ICT) Team discovery that a malicious actor was attempting to gain access to QLDC accounts using the VPN protocol on the External Firewall.
- 33. A small number of QLDC's accounts were found to be locking out regularly and consistently causing the affected staff members to be unable to work. A subsequent Investigation by ICT staff found irregular logs on the firewall from a Latvian IP (Internet Protocol) address attempting to gain access to QLDC user accounts by working through common logon name combinations (simon@qldc.govt.nz or simonj@qldc.govt.nz for example) to try and get access to our internal systems using VPN.
- 34. An immediate short-term workaround was applied to prevent the Threat Actor's ability to gain access by changing the FQDN (Fully Qualified Domain Name) of the visible published VPN to something more complex and secondly to enable MFA (Multi-Factor Authentication) for all VPN connections. At the time of writing further investigations were ongoing and medium to long term responses were still be determined.



C. Compliance Obligation Register

- 35. QLDC engaged Wynn Williams (Legal panel member) to develop a compliance register of mandatory external (Legal) obligations. The register contains obligations that apply to QLDC because of its 'ordinary operations' as well as 'situational obligations' that are contingent on certain circumstances, where those circumstances occur relatively frequently. In October a review of the Delegations Register was undertaken to update the register to reflect changes in statutes and bylaws. The review resulted in changes in obligations associated with 27 statutes within the register, and 9 statues being added.
- 36. The updated register contains a total of 1,171 obligations within approximately 100 statutes and bylaws. The updated obligations register has been circulated to all Tier 3 Managers, and the Risk & Compliance Manager is discussing obligations and associated compliance controls with Tier 3 Managers during regular (approximately quarterly) risk meetings. Updates to the obligations register will be made every six months (next review due April 2025), to reflect new legislation or amendments to statutes.
- 37. The review of the Obligations Register has been undertaken in conjunction with a review of the Delegations Register. Updates to the Delegations Register are managed by the Stakeholder & Democracy Services Team, and approved by Council where appropriate.
- 38. A Compliance Management Framework and associated Compliance Management Policy are intended to be implemented, once system requirements have been determined (building on the upgrades to the Risk Register and associated dashboard). While originally it was intended that the new Compliance Management System would be in place in 2024, due to other priorities, it is anticipated this will be delayed until 2025.

D. Protected Disclosures (Protection of Whistleblowers) Policy

- 39. In 2022, the Protected Disclosures (Protection of Whistleblowers) Act 2022 came into force replacing the Protected Disclosures Act. The 2022 Act extended the definition of serious wrongdoing, provided for direct reporting to appropriate authorities (without needing to raise matters first with employers) and strengthened protections for disclosers. In response to the new legislation, an updated version of QLDC's Protected Disclosures (Protection of Whistleblowers) Policy is proposed, which ensures QLDC is meeting its legal obligations under the Act (including having a policy consistent with the Act).
- 40. It is further proposed that the ownership of the Act is transferred from People & Capability to Risk & Compliance, given the broader definition of serious wrongdoing and its association with the Fraud Policy (also owned by the Risk & Compliance Team). People & Capability (as well as other teams) will continue to be involved in managing disclosures as provided for in the Policy.
- 41. Given the broader scope and obligations of the 2022 Act, guidance materials and a disclosure template have been developed to support compliance with the obligations of the Act.

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42. The proposed Protected Disclosures (Protection of Whistleblowers) Policy is attached as Attachment B.

E. Queenstown Airport Corporation Capital Reporting Framework

- 43. At the 16 November 2023 full Council meeting, Council endorsed the Queenstown Airport Corporation 2023 Draft Masterplan and directed staff to prepare a report to the AFRC meeting on Tuesday 12 December on the financial risk associated with the QAC's Masterplan, and any recommendations to Council around managing that risk.
- 44. At the 12 December 2023 AFRC meeting, the Risk and Compliance Manager reported his findings and associated recommendations to the AFRC regarding the financial risks associated with the Queenstown Airport Corporations (QAC) draft Masterplan. The AFRC noted the report and recommended to Council the associated risk mitigation measures outlined in the report. The recommendations sought to provide further assurance to QLDC regarding QAC's capital programme. To that end, it was recommended that future Statement of Expectation's outline QLDC's expectations in relation to QAC's programme, including :
 - A capital reporting framework to be approved by QLDC, including but not limited to programme/project delivery framework, status of investment projects against budget forecasts (%forecast v %complete) and programme (schedule), contingency, issues and risk, scope changes, assurance findings (including high-level reporting for bi-annual QAC Board, Full Council and Wānaka- Upper Clutha Community Board Meetings)
 - Project milestone reporting and exception reporting (including dividends), to be considered by AFRC, noting that the major shareholder will expect to be informed of such matters,
 - Expectations regarding dividends
 - Details on borrowing arrangements
 - Shadow credit rating reporting
 - Details of programme assurance framework (incorporating three lines model)
- 45. As per the Council's 2024 Statement of Expectations (approved 14 December 2023) and the corresponding Queenstown Airport Corporation's (QAC) Statement of Intent (year ending 30 June 2025), in December 2024, QAC provided QLDC with an overview of QAC's proposed capital reporting framework, as well as its associated Governance Framework and Roles and Responsibilities. A summary of the framework (provided by QAC) is included at Attachment C.
- 46. The proposed framework follows good practice and is broadly consistent with QLDC's Project Management Method. Like QLDC's Project Management Method, QAC's framework evidences the PRINCE2® principles¹. Specifically in relation to financial risks to QLDC, the proposed framework will provide assurance by addressing the following PRINCE2® principles: defining roles and responsibilities (both for Governance and Management), managing projects by stages and by

¹ PRINCE2® (Projects IN Controlled Environments) is a project management method widely recognised and used around the world and the basis of QLDC's Project Management Method.



exception (based on defined tolerances) and ensuring continued business justification, by reconfirming the business case, at least at each stage (sometimes referred to as stage gate reviews or end stage assessments).

- 47. QAC has proposed a reporting framework that provides a development pathway (timing and value) for its capital portfolio. Material developments will be categorised into Airfield, Landside, Terminal, Sustaining, and non-aeronautical and reporting will include the following:
 - Key phases / Milestones (as per QAC's Investment Decision Making Framework²)
 - Key Programme / Project Status
 - Risks and issues
 - Confirmation of balance sheet / funding capacity
 - Impact on dividends
- 48. QAC proposes that a confidential capital investment update will be prepared for the QLDC's AFRC at 6-monthly intervals, distributed in March and September of each year. This timing aligns with the draft Statement of Intent (March). The first update is expected to be delivered to AFRC in March 2025.
- 49. QAC has outlined tolerances for exception reporting, which will support traffic light status reporting. Whilst the Risk and Compliance Manager is seeking further clarification regarding how exceptions reporting will be provided between 6-monthly reporting to the AFRC, the approach broadly follows good practice.
- 50. Overall, the Risk and Compliance Manager considers the proposed Capital Reporting Framework to be good practice, and the minor areas of clarification that will be sought, do not materially impact upon whether the approach is considered appropriate. The Risk and Compliance Manager therefore recommends QAC's Capital Reporting Framework to the AFRC, as a means of providing assurance to QLDC regarding the management of financial risk associated with the QAC's Masterplan.
- 51. As outlined in Attachment C, QAC has proposed the following next steps:
 - Jan Mar 25 Approved ZQN Development Plan (incl. development pathway)

Capital update to QLDC Audit and Finance Risk Committee

Commence Aeronautical Pricing Consultation (revised pricing will take effect from Jul 25)

Apr – Jun 25 Refresh ZQN Funding Strategy

Develop Procurement Strategy

Finalise aeronautical pricing (from Jul 25)

² Refer to Attachment C (Appendix 1)

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- 52. Options have not been presented in this report with associated benefits and disbenefits for the following reasons:
 - Topics A, B, and C are included in the report for noting purposes only.
 - Topic D concerns the introduction of a policy updated to reflect legislative requirements.
 There is no reasonable alternative to recommending the Policy, except for the AFRC to direct
 Officers to make changes to the proposed Policy. Without understanding what changes the
 AFRC might propose, it is not possible to assess the benefits and disbenefits of proposed
 changes.
 - Topic E pertains to the QAC's proposed framework for Capital reporting, which the AFRC has
 previously recommended be considered and once satisfied, approved by Council. The AFRC
 has the option to recommend the proposed framework to the Council for approval,
 recommend that the Council do not approve the framework, or suggest an alternative
 framework. Without knowing the changes that the AFRC might propose, the benefits and
 disbenefits of those changes cannot be assessed.

Consultation Process | Hātepe Matapaki

Significance and Engagement | Te Whakamahi I kā Whakaaro Hiraka

- 53. This matter is of low significance, as determined by reference to the Council's Significance and Engagement Policy 2024 because it will not:
 - significantly impact on the environment, culture, and people of the district
 - significantly affect individuals, organisations, groups, and sectors in the community
 - be inconsistent with existing policy and strategy
 - significantly impact the objectives set out in the Financial Strategy, Long Term Plan and Annual Plan.

Māori Consultation | Iwi Rūnaka

54. This matter is of low significance and consultation is neither required nor necessary.

Risk and Mitigations | Kā Raru Tūpono me kā Whakamaurutaka

55. This matter relates to the management of all Strategic and Operational risks that are documented within the QLDC Risk Register. The QLDC Risk Management Framework and risk management maturity work programme helps to support the development of a more engaged and capable resilience culture across the Council, leading to more effective risk identification, evaluation, and mitigation outcomes.



Financial Implications | Kā Riteka ā-Pūtea

56. There are no financial implications associated with this matter.

Council Effects and Views | Kā Whakaaweawe me kā Tirohaka a te Kaunihera

- 57. The following Council policies, strategies and bylaws were considered:
 - Our Vision and Mission QLDC considered during risk identification, analysis, evaluation and treatment planning.
 - QLDC Risk Management Policy
 - Climate and Biodiversity Action Plan
 - QLDC Long Term Plan
 - QLDC Spatial Plan
 - 30 Year Infrastructure Strategy
- 58. The recommended option is consistent with the principles set out in the Risk Management Policy.
- 59. This matter supports the Long Term/Annual Plans through ensuring that effective mitigations are in place that support risks that could impact plan objectives.

Local Government Act 2002 Purpose Provisions | Te Whakatureture 2002 o te Kāwanataka ā-Kīaka

60. Section 10 of the Local Government Act 2002 states the purpose of local government is (a) to enable democratic local decision-making and action by, and on behalf of, communities; and (b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future, by providing a Risk Management Framework that supports QLDC in achieving its strategic and operational objectives. As such, the recommendation in this report is appropriate and within the ambit of Section 10 of the Act.

61. The recommended option:

- Can be implemented through current funding under the Long-Term Plan and Long Term Plan;
- Is consistent with the Council's plans and policies;
- Would not significantly alter the intended level of service provision for any significant activity undertaken by or on behalf of the Council or transfer the ownership or control of a strategic asset to or from the Council.

Attachments | Kā Tāpirihaka

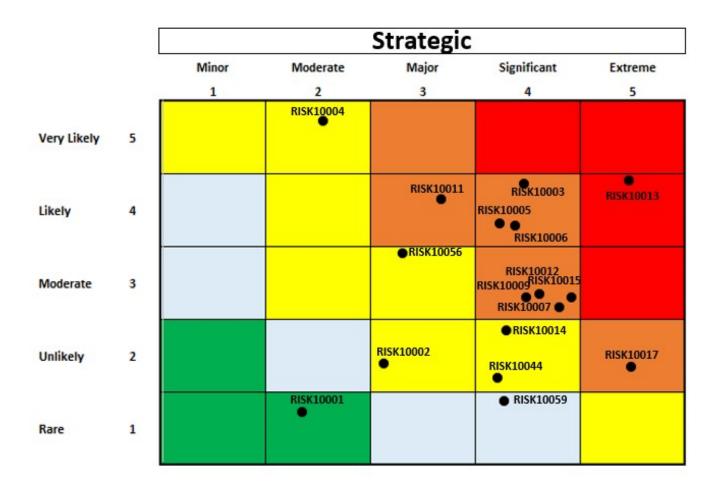
Α	Tier 1 Risk Summary
В	Proposed Protected Disclosures (Protection of Whistleblowers) Policy
С	QAC Capital Reporting Framework

Attachment A

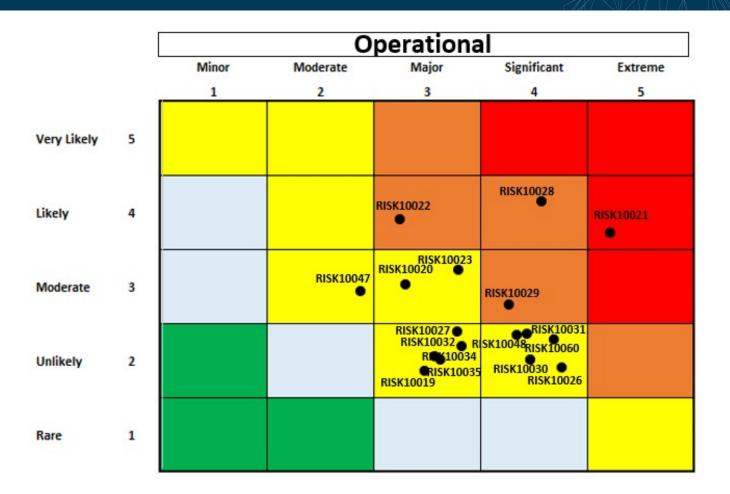


1 TIER 1 RISKS SUMMARY

Tier 1 risks were endorsed by the Audit, Finance and Risk Committee on 6 July 2024. Changes to Tier 1 risks were reported and noted by the committee on 7 March 2024. Note: The location of the risks within each cell is random (system generated) and positioned to enable each individual risk to be identified.









Strategic Risks

Row Labels -	Risk Title
■ RISK10001	☐ Insufficient, inadequate or failure of digital and technology systems
■ RISK10002	⊞ Erosion of social cohesion
■ RISK10003	⊟ Economic impacts and prosperity
■ RISK10004	□ Community Partnerships do not achieve objectives
■ RISK10005	☐ Ineffective planning for community services or facilities
■ RISK10006	☐ Ineffective planning for property and infrastructure
■ RISK10007	☐ Ineffective planning associated with natural hazards
■ RISK10009	Strategy for growth fails to meet objectives
■ RISK10011	☐ Insufficient supply chain resource capacity and/or capability to support Council achieve strategic and operational objectives
■ RISK10012	☐ Ineffective mitigation response to the declared climate and ecological emergency
■ RISK10013	■ Unexpected change in cost or funding
■ RISK10014	☐ Ineffective Financial Strategy
■ RISK10015	☐ Ineffective Governance
■ RISK10017	■ Ineffective Council response to, or recovery from a civil defence emergency event
■ RISK10044	☐ Failure to work effectively with Mana Whenua
■ RISK10056	■ Ineffective provision for the future planning and development needs of the district
■ RISK10059	☐ Ineffective planning and action to support climate change adaption

Operational Risks

Row Labels	Risk Title
■ RISK10019	□ Central Government reforms impact on Council achieving its objectives
■ RISK10020	☐ Ineffective communication
■ RISK10021	□ Ineffective operations, maintenance or renewal of property or infrastructure assets leading to failure(s).
■ RISK10022	■ Ineffective operations and maintenance of community services or facilities
■ RISK10023	☐ Disruption event to facility or service
■ RISK10026	☐ Ineffective enforcement
■ RISK10027	■ Inadequate construction management causing failure of infrastructure service or property damage
■ RISK10028	■ Ineffective procurement
■ RISK10029	☐ Ineffective compliance management practices
■ RISK10030	Audit of annual report or long-term plan identifies non-compliance/corrective actions
■ RISK10031	☐ Ineffective complaints handling
■ RISK10032	Health, safety or wellbeing incident affecting employee
■ RISK10034	Inadequate resource management or building consent systems, processes and/or people capability results in poor development outcomes and liability
■ RISK10035	☐ Ineffective business processes
■ RISK10047	□ Inadequate workforce capacity and/or capability to meet organisational needs
■ RISK10048	─ Health, safety or wellbeing incident affecting member of the public
■ RISK10060	■ Insufficient, inadequate or failure of information governance



Team/Directorate	Risk and Compliance
Approved/Adopted by	Council
Effective date	12 December 2024
Next review	12 December 2027

1. PURPOSE

The purpose of the Protected Disclosures (Protection of Whistleblowers) Policy (this policy) is to:

- define serious wrongdoing,
- provide procedures for disclosing alleged serious wrongdoing in compliance with the Protected Disclosures (Protection of Whistleblowers) Act 2022, which requires public sector organisations to have an internal procedure in which employees can disclose alleged serious wrongdoing,
- · provide clarity about how to disclose an alleged serious wrongdoing,
- outline how people who report alleged serious wrongdoing will be protected,
- set out responsibilities for investigating alleged serious wrongdoing.

2. OVERVIEW

Queenstown Lakes District Council (the Council) is committed to fostering an environment where the rights and interests of whistleblowers are protected. This policy outlines the Council's position on protected disclosures, also known as whistleblowing, and provides information on how to make a disclosure, how disclosures will be managed and investigated, and the protections available to whistleblowers.

This policy supports the Council's commitment to integrity, ethical behavior, and accountability. It encourages the reporting of alleged serious wrongdoing, provides avenues for such reporting, and aims to ensure that those who disclose alleged wrongdoing are treated fairly and do not suffer detriment.

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3. **DEFINITIONS**

Term	Definition
Act	In this policy, 'Act' refers to the Protected Disclosures (Protection of Whistleblowers) Act 2022.
Discloser	Any person to whom this Policy applies (as provided in Section 4).
Fraud	Fraud is defined in accordance with the Fraud Policy.
Protected disclosure	 A disclosure of information is a protected disclosure if the discloser: believes on reasonable grounds that there is, or has been, serious wrongdoing in or by the discloser's organisation; and discloses information about that in accordance with the Act; and does not disclose it in bad faith.
Serious wrongdoing	 Serious wrongdoing includes any act, omission, or course of conduct in (or by) the Council that is one or more of the following: an offence a serious risk to public health, or public safety, or the health or safety of any individual, or the environment a serious risk to the maintenance of law, including the prevention, investigation, and detection of offences fraud oppressive, unlawfully discriminatory, grossly negligent, or gross mismanagement. Serious wrongdoing is not: Something that is not unlawful or offensive but which you may not approve of. Something which may constitute a dispute or personal grievance in your employment, but does not reach the threshold of serious wrongdoing. Not sure? If you are not sure whether a matter may constitute serious wrongdoing, you may still make a disclosure under this Policy. The person responsible for reviewing your disclosure can determine whether or not the alleged conduct constitutes serious wrongdoing.
Council	Means the Queenstown Lake District Council (QLDC)



Receiver	Means the Internal Assurance Lead, Risk and Compliance Manager, QLDC Chief Executive, General Managers, Seniors Managers, Independent Chair of the AFR Committee, or Deputy Independent Chair.
Council Employee	Means current, former and temporary employees.

4. SCOPE

This policy applies to:

- Council employees including former employees of QLDC,
- Elected Members,
- Any person engaged or contracted directly by the Council, or employed by an entity contracted under a contract for goods, services, and/or works,
- any person who is engaged as a volunteer for Council.

5. MAKING DISCLOSURES

When should a disclose be made?

A disclosure should be made when a discloser is aware of alleged serious wrongdoing involving the Council. This includes actions that may: be an offense, pose a serious risk to public health, safety, or the environment, endanger the enforcement of laws (e.g., fraud), Involve gross mismanagement or unlawful discrimination.

If a discloser is unsure, a disclosure can still be made. The responsible person will review the disclosure and determine if it qualifies as serious wrongdoing. For a full definition of serious wrongdoing, refer to Section 3 of this Policy.

Why should a disclose be made?

Disclosing alleged serious wrongdoing helps uphold the Council's commitment to integrity, ethics, and accountable behaviour.

What protection will be provided to a discloser?

Anyone making a protected disclosure, is entitled to:

- **Confidentiality:** Every effort will be made to maintain the confidentiality of a discloser's identity, in accordance with legislative protections.
- **Protection from retaliation:** A discloser cannot be treated unfairly or threatened for making a disclosure.
- Immunity: A discloser is protected from civil, criminal, or disciplinary actions related to your disclosure.

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More details about protections can be found in Section 7 of this Policy.

5.1 EMPLOYEES AND VOLUNTEERS

Use Council's management lines first.

In general, normal management reporting lines will be appropriate for reporting alleged serious wrongdoings. In most instances a discloser will be able to achieve a satisfactory outcome by reporting the alleged serious wrongdoing to their own Manager, the General Manager of their Directorate, Risk and Compliance Manager, or other senior Manager. For volunteers, the Council's contact point should be used for reporting.

However, there may be occasions when an employee or volunteer may believe on reasonable grounds that utilising the previously mentioned reporting channels could result in one of the following scenarios:

- The issue remains unresolved or escalates into a more serious wrongdoing.
- They face retaliatory measures.
- The Manager designated to receive the disclosure is implicated or closely linked to those involved in the alleged serious wrongdoing.

If any of the above circumstances apply the employee or volunteer can make use of the alternative internal procedure for making a disclosure outlined below.

- Direct an email to protected.disclosure@qldc.govt.nz, or
- Direct an email to the QLDC Chief Executive, or
- Direct an email to the <u>People and Capability Director</u>, If the alleged serious wrongdoing is related to bullying or harassment, including sexual harassment, or
- Direct an email to afrchair@qldc.gov.nz, the Independent Chair of the AFR Committee, or in their absence, the Deputy Independent Chair.

5.2 ELECTED MEMBERS AND CONTRACTED PARTIES

Use Council's management first.

In general, Council's internal management channels will be appropriate for reporting alleged serious wrongdoings. In most instances a discloser will be able to achieve a satisfactory outcome by reporting the alleged serious wrongdoing to Council's General Managers, the Risk and Compliance Manager, or another senior Manager within Council.

However, there may be occasions when an elected member or contracted party may believe on reasonable grounds that utilising the previously mentioned reporting channels could result in one of the following scenarios:

- The issue remains unresolved or escalates into a more serious wrongdoing.
- They face retaliatory measures.

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• The Manager designated to receive the disclosure is implicated or closely linked to those involved in the alleged serious wrongdoing.

If any of the above circumstances apply the discloser can make use of the alternative internal procedure for making a disclosure outlined below.

- Direct an email to protected.disclosure@qldc.govt.nz, or
- Direct an email to the QLDC Chief Executive, or
- Direct an email to the <u>People and Capability Director</u>, If the alleged serious wrongdoing is related to bullying or harassment, including sexual harassment, or
- Direct an email to afrchair@qldc.gov.nz, the Independent Chair of the AFR Committee, or in their absence, the Deputy Independent Chair.

5.3 ESCALATION

Where an employee, volunteer, elected member, or contracted party believes on reasonable grounds either that the Council's internal management or the people outlined in the alternative's procedure are or may be involved in the alleged serious wrongdoing or are closely associated with the people involved in the alleged serious wrongdoing, the discloser may make the disclosure to an outside authority (see below).

5.4 DISCLOSURE TO AN OUTSIDE AUTHORITY (EXTERNAL DISCLOSURE)

All the individuals covered by this policy may be protected by the Act when making disclosure to an 'appropriate authority' outside QLDC where the person believes on reasonable grounds:

- that Council's internal management lines (General Managers, Risk and Compliance Manager, other senior Managers) are or may be involved in the alleged serious wrongdoing;
- QLDC's Chief Executive, Internal Assurance Lead, Independent Chair or Deputy Independent Chair of AFR
 Committee are or may be involved in the alleged serious wrongdoing;
- that immediate reference to an 'appropriate authority' (as defined below) is justified by the urgency of the matter or some other exceptional circumstances; or
- there has been no action or recommended action on the matter to which the disclosure relates within 20 working days of the discloser having made the disclosure in accordance with Council's internal procedure.

Appropriate Authority

The discloser may choose the authority or authorities most relevant to the nature of the alleged serious wrongdoing that is disclosing. The Act provides that an 'appropriate authority', without limiting the meaning of that term, includes:

• the head of any public sector organisation; and

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- any officer of Parliament; and
- (as examples) the persons or bodies listed in the second column of Schedule 2 Protected Disclosures (Protection of Whistleblowers) Act 2022; and
- includes the membership body of a particular profession, trade, or calling with the power to discipline its members.

The Act specifically states that 'appropriate authority' does not include a Minister of the Crown or a member of Parliament. Similarly in a local government context elected members or the Mayor should not be considered an 'appropriate authority.'

QLDC as an appropriate authority

In some circumstances, QLDC may be an appropriate authority, as defined in the Act, which is able to receive protected disclosures relating to alleged serious wrongdoing in respect of other organisations. Any disclosure of this nature that is received will be dealt with in accordance with the relevant statutory requirements.

6. TREATING DISCLOSURES

GUIDANCE: WHAT COUNCIL SHOULD DO

The steps outlined below detail the process and estimated timeline for investigating an alleged serious wrongdoing disclosure, as specified in the Serious Wrongdoing Guidance.

1. Acknowledge Receipt and Verify Details (Within 3 Working Days)

Upon receiving the disclosure, the receiver should contact the discloser using their preferred communication channel to:

- Acknowledge the date the disclosure was received.
- Summarise the receiver's understanding of the disclosure if it was made orally.
- Verify whether the disclosure has been made elsewhere and inquire about any outcomes.
- Gather all necessary details about the alleged serious wrongdoing.

2. Evaluate the Disclosure (Within 5 Working Days)

Evaluate the disclosure to determine if it warrants further investigation. If it is determined that an investigation is not warranted, proceed to Step 4.

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3. Address the Disclosure (Within 18 Working Days)

Take appropriate action to address the disclosure by:

- Conducting an investigation personally or forming an investigation team.
- Addressing any alleged serious wrongdoing by taking or recommending corrective actions.

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- Referring the disclosure to the appropriate authority under section 16 of the Act.
- Deciding that no action is required, in line with section 15 of the Act.

4. Inform the Discloser (Within 20 Working Days)

Inform the discloser of the actions taken or planned to address the matter, providing reasons for these actions. This should be done within 20 working days of receiving the disclosure.

However, when it is impracticable to complete these actions within 20 working days, the receiver should do the actions described above and then should:

- Inform the discloser how long the receiver expects to take to deal with the matter.
- Appropriately update the discloser about progress.
- Inform the discloser (with reasons) about what the receiver has done or is doing to deal with the matter in accordance with the section above (Step 3).

This section is guidance only. It does not confer a legal right (apart from the entitlements under sections 14, 32, and 33 of the Act) or impose a legal obligation on any person that is enforceable in a court of law.

7.PROTECTION

7.1 DISCLOSURES THAT ARE NOT PROTECTED

A disclosure is not protected if:

- the discloser knows the allegations are false,
- the discloser acts in bad faith,
- the information being disclosed is protected by legal professional privilege.

7.2 PROTECTION PROVIDED

If a discloser makes a protected disclosure of information in accordance with the Section 6 of this policy or refers a protected disclosure of information to an appropriate authority for investigation, the person is entitled to: confidentiality, not to be retaliated against or treated less favourably, and immunity from civil, criminal and disciplinary proceedings.

Confidentiality

Receivers of a protected disclosure must use their best endeavours to keep confidential information that might identify the discloser.

The exceptions are if the discloser consents to the release of the identifying information, or if there are reasonable grounds to believe that the release of the identifying information is essential:

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- for the effective investigation of the disclosure; or
- to prevent a serious risk to public health, public safety, the health and safety of any individual, or the environment; or
- to comply with the principles of natural justice, or
- to an investigation by a law enforcement or regulatory agency for the purposes of law enforcement

The Act provides that disclosers must be consulted in these cases (if practicable in respect of serious risk to public health, public safety, the health and safety of any individual, or the environment; or to an investigation by a law enforcement or regulatory agency for the purposes of law enforcement).

The Ombudsman can provide advice to disclosers considering making an anonymous disclosure.

The release of information that might identify a discloser in breach of these provisions means a complaint may be made under the Privacy Act 2020 for interference with privacy. As a result, the Privacy Commissioner may undertake an investigation.

A receiver must refuse a request for information if that information might identify the discloser of a protected disclosure – under the Official Information Act 1982, or the Local Government Official Information and Meetings Act 1987

Obligations not to retaliate or treat less favourably

QLDC must not retaliate or threaten to retaliate against an employee because the employee intends to make or has made a protected disclosure. If this occurs the employee has a personal grievance under the Employment Relations Act 2000. Retaliate means to dismiss the employee, treat the employee less favourably than other similar employees, or subject them to any detriment or disadvantage.

A discloser, or someone who supports the discloser, who is treated less favourably than others in the same or similar circumstances may be able access the anti-victimisation protections in the Human Rights Act 1993. This applies to all types of disclosers, including persons not covered by the Employment Relations Act.

Immunity from civil, criminal and disciplinary proceedings

Neither a discloser who makes a protected disclosure, nor a receiver who refers the disclosure, under the Protected Disclosures (Protection of Whistleblowers) Act 2022 is liable to any civil, criminal or disciplinary proceeding because of making or referring the disclosure. This applies even if there is a prohibition or restriction on disclosing the information such as in any contract, agreement, procedure or practice (except where the information is covered by legal professional privilege).

These protections only apply to making the disclosure. Action can still be taken against a discloser if they were involved in the wrongdoing.

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8. RELEVANT LEGISLATION

- Employment Relations Act 2000
- The Protected Disclosures (Protection of Whistleblowers) Act 2022
- Local Government Act 2002
- Local Government Official Information and Meetings Act 1987
- Ombudsmen Act 1973
- Privacy Act 2020

Note: Any legislation referred to should be interpreted as meaning the Act and its amendments.

9. RELATED DOCUMENTS

- Conflict of Interest
- Discipline and Dismissal Policy
- Employment Agreement
- Collective Agreement
- Fraud Control Plan
- Fraud Policy
- Employee Handbook
- QLDC Code of Conduct
- QLDC Code of Conduct of Elected Members
- Serious Wrongdoing Guidance
- Bulling and Harassment Policy

Attachment C: QAC Capital Reporting Framework

Capital Reporting Framework

November 2024

QAC Commitment

As outlined in the FY25 Statement of Intent:

- QAC will consult with QLDC and its Audit, Finance and Risk Committee (AFRC) in relation to its Capital Programme Disclosures. QAC will:
 - Present a capital reporting framework to be approved by QLDC based on the gateway investment approach.
 - Present project milestone reporting and exception reporting and provide briefings to the major shareholder through its AFRC, including expectation regarding dividends.
- Regular engagement with the QLDC AFRC on the Master Plan 2023 investment programme

Purpose

This document outlines the recommended approach to reporting on the Master Plan 2023 investment programme.

Proposed Reporting Framework

QAC will prepare a confidential update for QLDC's AFRC that will provide a Development Pathway (timing and value) for the capital portfolio. Material developments will be categorised into, Airfield, Landside, Terminal, Sustaining, and non-aeronautical. Detail will include:

- 1) Development Pathway
- 2) Key phases / Milestones (per QAC's Investment Decision Making Framework¹)
- 3) Key Programme / Project Status
- 4) Risks and issues
- 5) Confirmation of balance sheet / funding capacity
- 6) Impact on dividends

The status of Tier 1 (>\$1,000,000) projects, relative to the stage they are at each gateway, will be included in the report, on an exceptions basis. Refer below for further details of the QAC Project Management Methodology.

Frequency of Reporting

QAC proposes that a confidential capital investment update will be prepared for QLDC's AFRC at 6-monthly intervals, distributed in March and September of each year. This timing aligns with the draft Statement of Intent (March). The first update is expected to be delivered to QLDC's AFRC in March 2025.

ZQN Development Plan

The ZQN Development plan, which will inform the development / investment pathway is currently being prepared, with the support of Aurecon (independent consulting firm). The ZQN Development Plan, including proposed sequencing and value of the key programmes/projects, is expected to be approved by the QAC Board in early 2025.

The ZQN Development Plan will also confirm that the:

- Development pathway is affordable to our key stakeholders, including airline partners; and
- Development pathway is fundable.

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¹ Refer to Appendix 1

Each project / programme will be subject to business case approval based on the projects 'Tier'. Currently, the QAC's Board of Directors approves business cases (preliminary and final) for projects >\$1,000,000.

Project/Programme Methodology

QAC has implemented a well-proven project management methodology, with the support of Leva consultancy. The methodology employed is documented in QAC's Project Management Framework, which has a core focus on a standardized process and governance structure for capital projects. This approach follows the gateway approach, from the Portfolio Planning Stage through to the Project Closure and Handover Stages. The 'Project Management Framework - Quick Reference Guide' is provided in Appendix 2.

Also provided for reference is the Project Management Methodology, as applied to:

- Project tiers; referred to as the 'Project Tiers document' (Appendix 3); and
- Roles & Responsibilities (Appendix 4).

The Project Tiers are:

Tier	Project Value	Delegation	
1	>\$1,000,000	Board of Directors	
2	\$100,000 - \$1,000,000	Chief Executive Officer	
3	\$0 - \$99,999	Senior Leadership Team	

For each phase of a project the following requirements are documented:

• Inputs	Responsibility of	
 Planned Total Project Budget Inputs to pass 	Board of Directors,	
Stage Gate documentation	• CEO	
	Project Governance Group	
	Project Sponsor	
	Project manager	
	Project Team	

The <u>Roles and Responsibilities</u> extract (Appendix 4) provides clarity for each role in the project lifecycle, in respect to:

- Roles Description
- Responsibilities & Accountabilities
- Organisation Structure (Direct Reports & Reports to)

Exception Reporting

The tolerances applied for exception reporting are (ie, the allowance that we can work within before we need to go back to the approver for additional approval):

- 5% for Budget (as per the DA policy)
- 10% for Programme
- Scope change tolerance is determined based on its impact on Budget and Programme as per above.

These tolerances are reported using a traffic light system.

- Red (above the tolerance level)
- Amber (between 100% of plan/budget and the tolerance)

• Green (100% of plan/budget or below)

Next Steps

The proposed next steps are:

Jan – Mar 25 Approved ZQN Development Plan (incl. development pathway)

Capital update to QLDC Audit and Finance Risk Committee

Commence Aeroanutical Pricing Consultation (revised pricing will take effect from

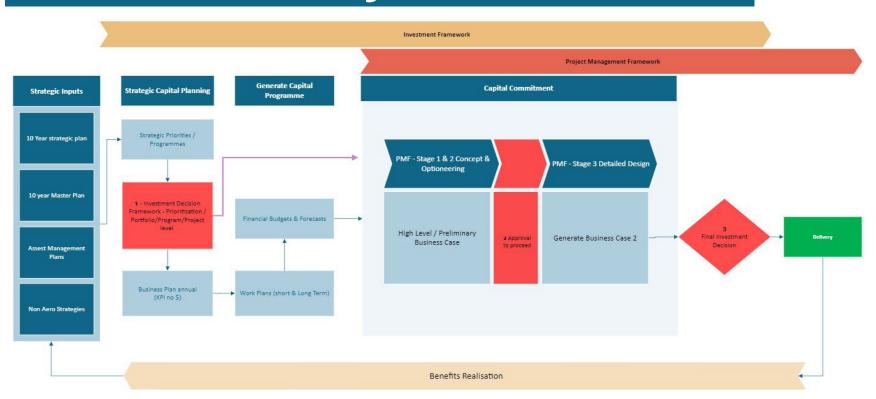
Jul 25)

Apr – Jun 25 Refresh ZQN Funding Strategy

Develop Procurement Strategy

Finalise aeronautical pricing (from Jul 25)

Investment Decision Making Framework - Overview



Appendix 2 QAC PMF Quick Reference Guide (V1.2).

QAC PROJECT MANAGEMENT FRAMEWORK - Quick Reference Guide **QAC Project Phase** Stage Gate Investment Logic Strategic Context Strategic Context Business Justification and Options Project Planning Project Delivery and Business Readiness Project Closure and Handover Responsibility SLT/Board Business Unit Business Unit/Supported by Project Team Project Team Project Team Project Team for the proposed investment, that resources are available and **Phase Description** strategic priorities (e.g. QAC Master Plan) ligh level planning of time cost to deliver outcomes. Initial risk Ontions Analysis Project Manager appointed Deliver project as per plants Project warranty period - defects liability / retentions Inform Procurement Detailed design Lessons Learned Initiate project Procurement of Business Case Resource/Contract Establish Project Control Group Refine Procurement Plan Benefits review Engage Stakeholders RFI/EOI Develop closure report Reassess Tier Engage procurement Project Kick Off Meeting Release and deployment planning Final Project Control Group meeting Commission planning Operational handover and support planning ities addressed in the Project Request Form Define and agree change management impact and approach Handover to BAU Define KPIs Risk identification workshop Status reporting Project Manager may be appointed On board key resources Project and stakeholder communication Measure KPIs Project Control Group Meetings Develop scope roject Closure Activities ge Gate 2 - Approve the Initial Business Case (1st cut) Develop project schedule Status Reporting age Gate 5 - Approve Project Close Out Report Establish Project team Planning and forecasting **Activities - All** Project planning (resources, budget, schedule, structure, approach) Project Change Control Risk and Issue Management / escalation Projects (not ever ise provides sufficient information so that the Stage Gate appr Go/ No Go decision ble to adequately assess and make an informed deci Plan and commence procuremen relevant for every ge Gate 1 - Approve the Project Request Form, assess the Tier Develop communication & stakeholder engagement plans Commission Asset and handover el, approve seed funding for optioneering phase, and approve project) Design (Preliminary, concept, detailed) Plan Testing and training approaches Risk and Issue Management Status Reporting Change Management Planning REI/EOI tape Gate 3 - Approve the Final Business Case, approve the Project Implementation Plan, and approve project to proceed to implementation BC Stope 2: At the consection of the Design/Planning Stope oject Initiation Document (PID) Updated Tier Assessment Status reports Project Control Group agenda/minutes Project Control Group agenda/minutes Project Control Group agenda/minutes Tier Assessment siness Case (initial - 1st cut (min PSO)) Project Management Plan (includes schedule, scope and cost forecasts) Procurement Documentation Updated project documents Closure report (including lessons learned) Contract management documentation pject Estimating and Budget Form want historical or background docume Requirements and Design Documentation Release and deploy plan ect Estimating & Budget Form Plans (communication, stakeholder engagement, testing, training, change porting documentation from fea management, sustainability) RAIDD register Business Case (final – 2nd out (min P90)) Outputs/Documents roject Estimating and Budget I forthly status reports (Business Central Job Costing Reporting) roject Implementation Plan including detailed design/plans (includes roject Issues and Risk Register roject Stakeholder Updates takoholder Engagement Plan) roject Estimating and Budget Form roject issues and Risk Register inge Request Form(s) oves indicative funding (Tier 3) oves project & Project Request Form (Tier 3) Confirmation of final design Business Case owner & oversight of execution Support Project Manager & Project Team Formal review of risks & issues proves funding for Design Phase (Tier 1) proves Procurement Strategy roject Monitoring & Reporting ormal review of risks & issues (Tier 3) opproves Change Request Forms (Tier 3) proves Change Request Forms ect Monitorine & Reporting med of programme/project deliverables and o owes project and Project Request Form (Tier 2, Tier 1) roves seed funding (Tier 2, Tier 1) report via monthly programme status report Governance roves Change Request Forms (Tier 2, Tier 1) view CAC Board reporting requirements oves funding for Design Phase (Tier 2, Tier 1)

QAC Project Phase	Pre Project Concept		Optioneering & Feasibility	Design & Planning	Implementation	Review & Closeout
Stage Gate	Portfolio Planning 0	Project Request Form 1	Budness Case 2	Project Management Plan & Design	Deliver Project, Commission and Handover	Project Closure Réport 5
Investment Logic	c Investment Framework					
Purpose	Strategic Context	Strategic Context	Business Justification and Options	Project Planning	Project Delivery and Business Readiness	Project Closure and Handover
Responsibility	SLT/Board	Business Unit	Business Unit/Supported by Project Team	Project Team	Project Team	Project Team
PMO Activities	Support colorion of programme development and long-term planning with business units	Manage approvationerings for Tar 1 projects Update organisation-wide project register	Monital/regart pipeline of search Agrae project for , opproach and augusts Review Stage date hevine and agranval documents Tier 2 & 1 Monage approach/meetings for Tier 1 projects Review project setup (including france), identify gaps	Monther & Report or progress: Quided exprise reposite from status reports and governance meetings Provide advice and direction. Review Stage Gate Review and approved documents Tier 2 & 2 projects. Manage approvate/Intensings for Tier 1 projects.	Monitor and Report on progress Provide adolect and direction Escalation Lipidate project register from status reports and governance meetings Manage change control approvals	Provide adries and divertion Review project clause and handover Check project admin is complete:



PROJECT MANAGEMENT FRAMEWORK

Tier 3 - Project Requirements (\$0 - \$99,999)

Responsible (R)	The team member(s) who perform the task or activity
Accountable (A)	The team member(s) who are ultimately in charge of the task or activity
Consulted (C)	The team member(s) whose opinions are sought, give feedback, and contribute
Informed (I)	The team member(s) who need to be informed of delivery of the task or activity

	Concept (Stage 1)	Optioneering (Stage 2)	Design (Stage 3)	Implementation (Stage 4)	Review (Stage 5)
inputs	Idea or concept is submitted to Project Sponsor for consideration as a business opportunity or providing resolution to a problem statement.	Tier 1 Projects may not require an optioneering phase or it may be able to be incorporated into the design phase.	Options analysis summary and Business Case (1" cut) if applicable, otherwise Completed project request form.	Approved Business Case Approved Project Plan Signed procurement contracts	Completed UAT if required. Practical Completion
Planned Total Project Budget inputs to pass Stage Gate	High level estimate of Total Planned Project Cost Cost Estimate to complete Optioneering Phase	Estimated total project budget at minimum 50% certainty (P50). Cost estimate to complete Design Phase Indicative PY timing	Full project implementation costs and FY timings with minimum 90% certainty (P90) CAPEX and OPEX implications	Full Project Cost Tracking and Budget Control FY Forecasting	Project cost variance report Capitalisation of costs Adjustments to Fixed Asset register
Documentation outputs from stage	Project Request Form Relevant historical or background documentation.	Business Case – 1° Cut (P60) Monthly Project Status Reporting Project Estimating and Budget Form Project Issues & Risk Register Any supporting documentation as a resulting of feasibility study and/or options analysis including concept design/plans. Minutes of any meetings held Procurement plans	Business Case - 2 nd Cut (P90) Project Plan documents including detailed design & procurement. Project Risks & Issues Register Monthly Project Status Reports Project Estimating and Budget Form Minutes of any meetings held Change Request Form(s) Project Stakeholder Updates	Monthly Project Status Reporting Project Estimating and Budget Form – project cost tracking. Project Risks & Issues Register Minutes of any meetings held Change Request Forms Project Stakeholder Updates Communication Plans	Project Close Out Report Minutes of any meetings held As-built drawings and manuals Code of Compliance documentation
Project Governance Group (PGG)	Informed of project (R) Approves appointment of PS	(I) Informed of project progress (C) As necessary on any project matters	(I) Informed of project progress (C) As necessary on any project matters	(I) Informed of project progress (C) As necessary on any project matters	(I) Deliverables and Project Close Out Report have been signed off
Project Sponeor (PS) (GM or Line Manager)	Approves indicative funding based on Project Request Form Assigns Project resources Approves project and signs off Project Request Form (R) Proceeding to next stage	(A) Feasibility review and options analysis (A) Business Case owner and oversight of execution (A) Approves funding to complete Design Phase. (A) Approves procurement strategy (A) Project Monitoring and Reporting (A) Formal review of risks and issues before next stage (escalating to PGG if necessary) (A) Approves Change Request Forms	Confirms sufficient funding in place for implementation (A) Project Monitoring and Reporting (A) Formal review of risks and issues before next stage (escalating to PGG if necessary) (A) Approves Change Request Forms (A) Approves Project Plan (R) Supports PM and PT (R) Point of escalation for staff who have project related issues.	RI Control project scope A) Support PM & PT A) Formal review of risks and issues (escalating to PGG if necessary) A) Approves Change Request Forms Approves monthly Project Monitoring & Reporting to be submitted to PGG.	(A) Sign-off deliverables and Project Close Out Report
Project Manager (PM)	(R) Identifies project team resource requirements (R) Ensures SharePoint set up to save projected related documents	(R) Feasibility review and options analysis (R) Business Case preparation – 1" Cut (R) Determine procurement strategy. (R) Liaise with external suppliers (R) Manage PT (R) Analysis of options resulting in recommendation of design/deliverables. (R) Determines the frequency of project team meetings Complete Project Monitoring and Reporting (R) Proactive management of risks and issues	(R) Business Case preparation – 2 ¹⁴ Cut (R) Development of Implementation Plan (R) Completion of final design (R) Procurement strategy deployed (R) Manage PT (R) All Project Monitoring and Reporting (R) Proactive management of risks and issues (R) Initiate change requests and submit for review by PS (R) All stakeholder management and communication.	R) Liaise with external suppliers (R) Manage PT (A) Complete Project Monitoring and Reporting (R) Project Budget Tracking (R) Proactive management of risks and issues (R) Initiate change requests and submit for review by PS (C) Acts as point of escalation between PT and PS	(R) Undertake project review meeting (R) Complete Project Close Out Report and sign-off
Project Team (PT)		R) provide input into project documentation R) Provide project progress information as required. Work with the PS, PM and other PT members to determine the recommended option.	(R) Providing input into project documentation including project implementation plan. (R) Provide project progress information as required.	(R) Provide input into project documentation (R) Provide project progress information as required.	(R) Provide input into project close-out process including handover of all operational and BAU processes.

Responsible (R)	The team member(s) who perform the task or activity
Accountable (A)	The team member(s) who are ultimately in charge of the task or activity
Consulted (C)	The team member(s) whose opinions are sought, give feedback, and contribute
Informed (1)	The team member(s) who need to be informed of delivery of the task or activity

Tier 2 - Project Requirements (\$100,000 - \$999,999)

	Concept (Stage 1)	Optioneering (Stage 2)	Design (Stage 3)	Implementation (Stage 4)	Review (Stage 5)
Inputs	Idea or concept is submitted to Project Sponsor for consideration.	Approved Project Request Form	Approved Business Case – 1 st Cut Options Analysis report / Feasibility Study	Approved Business Case – 2 nd Cut Approved Project Plan Signed Procurement contracts	Compliance documentation as required. Practical Completion Cert.
Planned Total Project Budget Inputs to pass Stage Gate	High level estimate of Total Planned Project Cost Cost Estimate to complete Optioneering Phase	Estimated total project budget at minimum 50% certainty (P50) Cost estimate to complete Design Phase Indicative FY timing	Full project implementation costs and FY timings with minimum 90% certainty (P90) NPV and IRR CAPEX and OPEX implications	Full Project Cost Tracking and Budget Control FY Forecasting	Full project variance report Capitalisation of costs where required
Documentation outputs from stage	Project Request Form Relevant historical or background documentation.	Business Case – 1 ** Cut (min P50) Monthly Project Status Reports Project Estimating and Budget Form Project Issues & Risk Register Any supporting documentation as a resulting of feasibility study and/or options analysis including concept design/plans. Minutes of any meetings held	Business Case – 2 nd Cut (min P90) Project Implementation Plan documents including detailed design. Project Risks & Issues Register Morthly Project Status Reports Project Estimating and Budget Form Minutes of any meetings held Change Request Form Project Staksholder Updates	Monthly Project Status Reports Project Estimating and Budget Form – project cost tracking Project Risks & Issues Register Minutes of any meetings held Change Request Forms Project Stakeholder Updates PCG Reports as required.	Project Close Out Report Minutes of any meetings held As-built drawings and manuals Code of compliance documentation.
CEO		(I) Informed of project progress (C) As necessary on any project matters	(I) Informed of project progress (C) As necessary on any project matters (R) Approval of Business Case and Implementation Plan	(i) Informed of project progress (C) As necessary on any project matters	(i) Deliverables and Project Close Out report has been signed off.
Project Governance Group (PGG)	(R) Evaluate idea/concept against business priorities, decision made whether to consider further. If yes: (R) Approves project and signs off Project Request Form (R) Approves seed funding (R) Documents decisions made	(R) Reviews Business case and approves to move into Design Phase (R) Approves funding for design phase (C) As necessary on any project matters	(R) Providing Business Case submission to CEO (R) Resolution of risks, issues, actions, etc as escalated by PS. Approves change request forms	(R) Resolution of risks, issues, actions, etc as escalated by PS (A) approves change request forms. (I) Monthly project monitoring and reports	(R) Formally close out the project – sign off deliverables and Project Close Out report
Project Sponsor (PS) (GM or Line Manager)	Assigns Project resources (R) Proceeding to next stage	(A) Feasibility review and options analysis (A) Business Case owner and oversight of execution (A) Approves procurement strategy (A) Project Monitoring and Reporting (A) Formal review of risks and issues before next stage (escalating to PGG if necessary)	(A) Confirmation of final design. (A) Business Case owner and oversight of execution. (R) Confirms sufficient funding in place for implementation (A) Project monitoring and reporting (R) Formal review of risks and issues before next stage (escalating to PGG if necessary) (R) Ensuring change requests are signed off by PGG	Riy Control project scope A) Support PM & PT A) Formal review of risks and issues (escalating to PGG if necessary) A) Approves Change Request Forms Approves monthly Project Monitoring & Reporting to be submitted to PGG.	(A) Sign-off deliverables and Project Close Out Report
Project Manager (PM)	(R) Identifies project team resource requirements (R) Ensures SharePoint set up to save projected related documents	(R) Feasibility review and options analysis (R) Business Case preparation – 1 ° Cut (R) Determine procurement strategy. (R) Liaise with external suppliers (R) Manage PT (R) Analysis of options resulting in recommendation of design/deliverables. (R) Determines the frequency of project team meetings Complete Project Monitoring and Reporting (R) Proactive management of risks and issues	(R) Business Case preparation − 2 nd Cut (R) Development of Implementation Plan (R) Completion of final design (R) Procurement strategy deployed (R) Manage PT (R) All Project Monitoring and Reporting (R) Prosective management of risks and issues (R) Initiate change requests and submit for review by PS (R) All stakeholder management and communication.	R) Liaise with external suppliers R) Manage PT A) Complete Project Monitoring and Reporting R) Project Budget Tracking R) Project Budget Tracking R) Prosetive management of risks and issues R) Initiate change requests and submit for review by PS C) Acts as point of escalation between PT and PS	(R) Undertake project review meeting (R) Complete Project Close Out Report and sign-off
Project Team (PT)		(R) provide input into project documentation (R) Provide project progress information as required. Work with the PS, PM and other PT members to determine the recommended option	(R) Providing input into project documentation including project implementation plan. (R) Provide project progress information.	(R) Provide input into project documentation (R) Provide project progress information as required.	(R) Provide input into project close-out process including handover of all operational and BAU processes

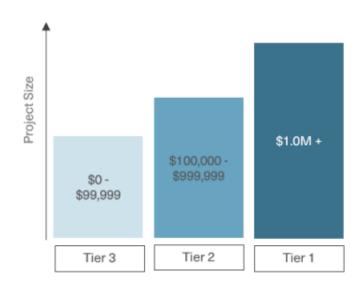
Tier 1 - Project Requirements (\$1,000,000 +)

Responsible (R)	The team member(s) who perform the task or activity
Accountable (A)	The team member(s) who are ultimately in charge of the task or activity
Consulted (C)	The team member(s) whose opinions are sought, give feedback, and contribute
Informed (I)	The team member(s) who need to be informed of delivery of the task or activity

	Concept (Stage 1)	Optioneering (Stage 2)	Deelgn (Stage 3)	Implementation (Stage 4)	Review (Stage 5)
Inputa	Idea or concept is submitted to PMO for consideration.	Approved Project Request Form	Approved Business Case – 1st Cut (P50) Options Analysis / Feasibility study Concept Design (if applicable)	Approved Business Case -2 rd Cut (P90) Approved Project Plan Signed procurement contracts	Compliance documentation Practical completion certs.
Planned Total Project Budget inputs to pass Stage Gate	High level estimate of Total Planned Project Cost Cost Estimate to complete Optioneering Phase	Estimated total project budget at minimum 50% certainty (P50) Cost estimate to complete Design Phase Indicative FY timing	Full project implementation costs and FY timings with minimum 90% certainty (P90) NPV and IRR CAPEX and OPEX implications	Full Project Cost Tracking and Budget Control FY Forecasting	Full project variance report Capitalisation of costs where required
Documentation outputs from stage	Project Request Form Relevant historical or background documentation.	Business Case – 1" Cut (min P50) Monthly Status Reports Project Estimating and Budget Form Project Issues & Risk Register Any supporting documentation as a resulting of feasibility study and/or options analysis including concept design/plans. Minutes of any meetings held	Business Case – 2 nd Cut (min P90) Project Implementation Plan documents including detailed design. Project Risks & Issues Register Monthly Project Status Reports Project Estimating and Budget Form Minutes of any meetings held Change Request Form Project Stakeholder Updates	Monthly Project Status Reports Project Estimating and Budget Form – project cost tracking Project Risks & Issues Register Minutes of any meetings held Change Request Forms Project Stakeholder Updates	Project Close Out Report Minutes of any meetings held
QAC Board		Informed of project by CEO and Project Governance Group. (i) Business case and recommended option. Provide strategic direction on	(A) Approval of Business Case and Implementation Plan. (C) As necessary on any project matters (R) Review Board Paper and approve project for implementation	(I) Informed of project progress (R) Approves Change Request Forms (if applicable) (C) As necessary on any project matters	(I) Informed of project progress
CEO	(R) Approves concept to Optioneering Phase	(R) Reviews Business case and approves to move into Design Phase (R) Approves funding for design phase (C) As necessary on any project matters	(R) Submitting Business Case to QAC Board for approval. (I) Informed of project progress (C) As necessary on any project matters	(I) Informed of project progress (C) As necessary on any project matters	(I) Deliverables and Project Close Out report has been signed off.
Project Governance Group	(R) Evaluate idea/concept against business priorities, makes recommendation to CEO If approved: (R) Approves project and signs off Project Request Form (R) Approves seed funding (R) Documents decisions made	(R) Submit Business Case to CEO for approval. (R) Approves funding for design phase (C) As necessary on any project matters	(R) Providing Business Case submission to CEO (R) Resolution of risks, issues, actions, etc as escalated by PS. Approves change request forms	(R) Resolution of risks, issues, actions, etc as escalated by PS (A) approves change request forms. (I) Monthly project monitoring and reports	(R) Formally close out the project – sign off deliverables and Project Close Out report
Project Sponsor (PS) (GM or Line Manager)	Assigns Project resources (R) Proceeding to next stage	(A) Feasibility review and options analysis (A) Business Case owner and oversight of execution (A) Approves procurement strategy (A) Project Monitoring and Reporting (A) Formal review of risks and issues before next stage (escalating to PGG if necessary) (R) Ensuring change requests are signed off by the SC.	(A) Confirmation of final design. (A) Business Case owner and oversight of execution. (R) Confirms sufficient funding in place for implementation (A) Project monitoring and reporting (R) Formal review of risks and issues before next stage (escalating to PGG if necessary) (R) Ensuring change requests are signed off by PGG	(R) Control project scope (A) Support PM & PT (A) Formal review of risks and issues (escalating to PGG if necessary) (A) Approves Change Request Forms Approves monthly Project Monitoring & Reporting to be submitted to PGG.	(A) Sign-off deliverables and Project Close Out Report
Project Manager (PM)	(R) Identifies project team resource requirements (R) Ensures SharePoint set up to save projected related documents	R) Feasibility review and options analysis R) Business Case preparation – 1" Cut R) Determine procurement strategy. R) Lisise with external suppliers R) Manage PT	(R) Business Case preparation – 2 nd Cut (R) Development of Implementation Plan (R) Completion of final design (R) Procurement strategy deployed (R) Manage PT	(R) Liaise with external suppliers (R) Manage PT (A) Complete Project Monitoring and Reporting (R) Project Budget Tracking	(R) Undertake project review meeting (R) Complete Project Close Out Report and sign-off

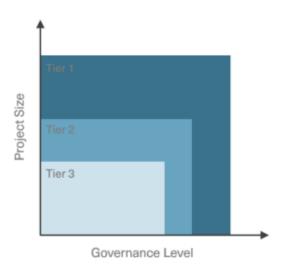
	(R) Analysis of options resulting in recommendation of design/deliverables. (R) Determines the frequency of project team meetings Complete Project Monitoring and Reporting (R) Proactive management of risks and issues	(R) All Project Monitoring and Reporting (R) Proactive management of risks and issues (R) Initiate change requests and submit for review by PS (R) All stakeholder management and communication.	(R) Proactive management of risks and issues (R) Initiate change requests and submit for review by PS (C) Acts as point of escalation between PT and PS	
Project Team (PT)	(R) provide input into project documentation (R) Provide project progress information as required. Work with the PS, PM and other PT members to determine the recommended option	(R) Providing input into project documentation including project implementation plan. (R) Provide project progress information.	(R) Provide input into project documentation (R) Provide project progress information as required.	(R) Provide input into project close-out process including handover of all operational and BAU processes

QAC Project Scalability



Note: project size is based on Planned Total Project Budget

Tiered Governance Approach



QUEENSTOWN AIRPORT CORPORATION

PROJECT MANAGEMENT FRAMEWORK

Appendix 1: Roles and Responsibilities

Project Governance Group

Description	The Project Governance Group (PGG) is responsible for making all material and critical decisions required throughout the project lifecycle. Therefore, the Governance Group will need to be comprised of senior staff who have the technical and managerial skills to assess and prioritise the decisions that will enable all projects undertaken by QAC to proceed towards their goals. The PGG will meet monthly according to a timetable. However, they should also be flexible to meet 'off cycle' when needed (e.g for urgent projects, urgent change requests, significant deliverables and/or decision point).
Responsibilities and accountabilities	 Ensures the project aims are consistent with the company's strategic direction, objectives, and priorities. Agree and accept the Project Request Form or Business Case (Tier 3 and 4) Recommend commitment to or abandonment of the project to the Senior Leadership Team (SLT) Appoint a Project Sponsor to be responsible for delivery of the project Agree the project approach; design; and associated business case Decisions and oversight necessary to successfully complete the project Monitor progress against the agreed project plan Resolve major issues that cannot be resolved by the Project Manager or Project Sponsor Resolve major business issues and internal conflicts that impact the project Provide strategic direction in the assessment and management of risk Provides governance of the project management process Assists with making resources available Oversight of risks and issues Approve actions to prevent and/or recover from unforeseen events Approve Change Requests in line with Project Governance Requirements Approve Stage Gates in line with Project Governance Requirements Formally close project, once all deliverables provided and post project activities completed
Direct reports	Project Sponsors, Head of Infrastructure Delivery
Reports to	Senior Leadership Team, QAC Board

Project Control Group

Description	The Project Control Group (PCG) is a project specific group responsible for oversight and strategic direction of the project. This includes but is not limited to assisting with the management of risks, resources, variances, and recommendations to the Project Governance Group. Therefore, the Control Group will need to be comprised of the Project Manager, Project Sponsor, independent advisors (eg, Quantity Surveyors), and senior managers who have the decision making authority that will enable all projects undertaken by QAC to proceed towards their goals. The PCG will meet monthly according to a timetable. However, they should also be flexible to meet 'off cycle' when needed (e.g for urgent change requests, significant deliverables and/or decision point).	
Responsibilities and accountabilities	 Ensures the project aims are consistent with the company's strategic direction, objectives, and priorities. Agree and accept the Project Request Form or Business Case (Tier 2 & 3) Recommend commitment to or abandonment of the project to the Senior Leadership Team (SLT) and/or PGG. Appoint a Project Sponsor to be responsible for delivery of the project Agree the project approach; design; and associated business case Decisions and oversight necessary to successfully complete the project Monitor progress against the agreed project plan Resolve major issues that cannot be resolved by the Project Manager or Project Sponsor Resolve major business issues and internal conflicts that impact the project Provide strategic direction in the assessment and management of risk Assists with making resources available Oversight of risks and issues Approve actions to prevent and/or recover from unforeseen events Approval of project deliverables Make recommendations to PGG to approve Change Requests in line with Project Governance Requirements Formally close project, once all deliverables provided and post project activities completed 	
Direct reports	Project Sponsors, Head of Infrastructure Delivery	
Reports to	Project Governance Group, CEO & QAC Board as required.	

Project Sponsor

Description	The Project Sponsor (PS) is the individual accountable for ensuring that a project meets its objectives and delivers the projected benefits. They should be the owner of the overall business change that is being supported. The PS should ensure that the change maintains its business focus, has clear authority and that the context, including risks, are actively managed. This individual must take personal responsibility for		
	successfully delivery of the project.		
	The PS should be prepared to take decisions and should be proactive in providing leadership and direction throughout the life of the project. They should be responsible for ensuring the organisation can fully exploit the outcome of the change such that the benefits are delivered as a result of that outcome.		
Responsibilities and accountabilities	Agree and accept the Project Request Form or Business Case (Tier 1 and 2)		
	 Own and oversee the development of the project business case Ensure that the aims of the planned change continue to be aligned with the business Ensure the project is correctly established, resources are in place, and that all necessary control procedures are implemented Secure the investment required to complete the project and achieve the required business change Ensure that an appropriate project organisation structure is in place and that logical plans are developed and agreed Approve the progress of the project through the identified gates in the project management process Monitor and control progress of the business change at a strategic level Refer serious problems upwards as necessary and to other Stakeholders in a timely manner Undertake regular consultation with those delivering the change and all stakeholders Ensure that the communication processes are effective Approve Change Requests in line with Project Governance Requirements Approve Stage Gates in line with Project Governance Requirements 		
Direct reports	Project Manager		
Reports to	PGG and Senior Leadership Team or QAC Board as required.		

Subject Matter Expert

Description	A Subject Matter Expert is called upon to undertake work, share knowledge and provide guidance where they have specific expertise in the project area.	
Responsibilities and accountabilities	Input into specific aspects of the project, in line with area of expertise Providing specialist input Involvement in project discussions as and when the project team need Quality assurance during implementation	
Direct reports	N/A	
Reports to	Project Sponsor and Project Manager	