

Annexures

ANNEXURE A**CORPORATE RISK MANAGEMENT SURVEY****A. Introduction**

This survey will be applied in identifying the key risks faced by the South African Private Healthcare Administrator and in developing a suitable corporate risk management programme.

B. Reason for undertaking study

Based on an evaluation of South African healthcare administration literature relating to corporate risk management, it would seem that little attention has been given to this field of study. The following specific areas of weakness have been identified:

- Slowness of South African Healthcare Private Administrators in adopting corporate risk management.
- Increased regulatory risks that could be effectively addressed by a corporate risk management programme.
- Slowness of professional bodies in promoting corporate risk management as one of the key processes within business management.
- Lack of industry awareness regarding developments in the field of corporate risk management based on international best practice.

C. Key Definitions

The following definitions should be relied upon:

Risk - A concept used to express uncertainty around all possible future events, which could significantly influence the achievement of the organisation's collective business objectives.

Corporate Risk Management - The structured process of identification, assessment and the continuous management of the combined risks aimed at ensuring stakeholder expectations are achieved.

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D. Completing the Survey

The survey is subdivided into 4 sections. The sections cover:

- Fundamental concepts
- Risk identification within the medical scheme environment
- Risk management continuum issues
- Uniform processes

Each of the sections requires the reader to input either one or more of the following:

- Importance score
- Manageability score
- Absolute scores in terms of Severity and Likelihood
- Implementation status score
- Difficulty in implementing score

The scales applied will be referred to at the bottom of each page of the survey.

E. Overall

All results will be treated in the strictest confidence and only aggregated results will be presented.

Please do not hesitate to contact the writer on 082 602 0601 should you require any additional information or experience difficulty in completing the questionnaire.

<i>Name of person completing questionnaire</i>		
<i>Designation</i>		
<i>Organisation</i>		
<i>I would like a copy of the end results</i>	Yes	No
<i>Mark with an (X)</i>		

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1. Fundamental Concepts**1.1**

Corporate governance:

	Yes	No	Importance
The issue of corporate governance standards, i.e. King, has increased the importance of corporate risk management within your organisation?			

1.2

Corporate Governance Priorities - Assign levels of importance to the following criteria relating to governance of the medical scheme and how well you believe this is being managed within your own organisation:

	Importance	Manageability
1. Employment equity/transformation		
2. Succession management		
3. Management performance and effectiveness		
4. Organisational performance measures		
5. Vision and Strategy		
6. Board composition and leadership		
7. Corporate Risk Management		
8. Board accountability, remuneration and performance		
9. Internal control		
10. Values and ethics		
11. Internal and external reporting		
12. Social and community involvement		
13. Worker participation		
14. Policy making and compliance		
15. Environmental issues		
16. Audit committee functioning		
17. Compliance with laws and regulations		
Other?		

Importance Scale:

>8 = Crucial.....7.....6 = important.....5.....4.....3 = cognisant.....2.....1 = unnecessary.....0 = N/A

Manageability Scale:

>8 = Managed/optimised.....7.....6 = defined.....5.....4.....3 = repeatable.....2.....1 = initial/rudimentary

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1.3

Which of the following factors are considered to be the most pressing issues facing the medical scheme environment in South Africa and how do you believe this is being addressed within your own organisation?

	Importance	Manageability
1. Effectively manoeuvring an environment facing continuous volatility in terms of legislative requirements		
2. Meeting new financial reporting requirements		
3. More effective actuarial risk management practices to address the impact of terminal diseases on the funds of the more healthy		
4. Increased prevalence and complexity of service capitation contracts (i.e. per diem rates)		
5. Addressing and preventing fraudulent activities both internally and externally		
6. Maximising operational performance to ensure administration costs remain reasonable to the medical scheme		
7. Implementing or improving a cost effective healthcare option for the lower income population		
8. Implementing suitable combat mechanisms to address the effects of medical inflation		
9. Implementing or maintaining effective information systems to meet the demand of increased information requirements by management		
Other?		

Importance Scale:

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Manageability Scale:

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1.4

Which of the following factors regarding corporate risk management within the duties of the administrator are cause for concern and how well do you believe they are being managed within your organisation?

	Importance	Manageability
1. Current risk management systems are unable to identify and manage all potentially significant risks in time or in advance		
2. The responsibilities for risk management have not been defined within the context of the administrator and medical scheme		
3. Certain risk types are currently being addressed better than others		
4. Risk management is focused on the negative side of risk and does not consider risk as areas of possible opportunity		
5. Risk management does not address the requirements of the updated King Report on Corporate Governance and other authoritative standards		
6. Risk management is not focused on ensuring that members interests are maximised		
7. Risk Management is treated as an afterthought		
8. The need for improved corporate risk management considering the increase in public awareness regarding risk management		
9. Techniques used to quantify risk are outdated and subjective		
Other?		

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1.5

Which of the following functions of the council of medical schemes do you consider important?

	<i>Importance</i>
1. Protect the interests of members at all times	
2. Control and coordinate the functioning of medical schemes in a manner that is complementary with the national health policy	
3. Make recommendations to the Minister of Health on criteria for the measurement of quality and outcome of the relevant health services provided for by the medical schemes and such other services as the Council may determine, from time to time	
4. Investigate complaints and settle disputes in relation to the affairs of medical schemes as provided for in the Act	
5. Collect and disseminate information regarding private healthcare	
6. Make rules, not inconsistent with the provisions of the Act, for the purpose of the performance of its functions and the exercise of the Council's powers	
7. Advise the Minister of Health on any matter concerning medical schemes	
8. Perform any other functions conferred on the Council by the Minister or by the Act	
Other?	

Importance Scale:

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1.6

What improved benefits do you believe a corporate risk management programme could bring to administration of the medical scheme and how well do you believe they are being addressed within your own organisation?

	<i>Importance</i>	<i>Manageability</i>
1. Management has comprehensive and accurate information at hand to formulate informed decisions regarding the trade-off between risk and reward in advance		
2. Medical scheme objectives are maximised by ensuring that new strategic concepts are fully assessed before being executed		
3. All business resources are aligned with the purpose of evaluating and managing the uncertainties the medical scheme faces as it creates value		
4. Selects and implements the best strategy for exploiting desirable risks while concurrently mitigating or eliminating undesirable ones		
5. Allows better allocation of capital to risk driven initiatives		
6. Provides certain protection against executive liability and adverse publicity or attention from investor and other stakeholders		
7. Optimises the integration of all risk management and assurance activities (e.g. internal audit; quality assurance, fraud, etc.) thereby avoiding duplication of effort		
Other?		

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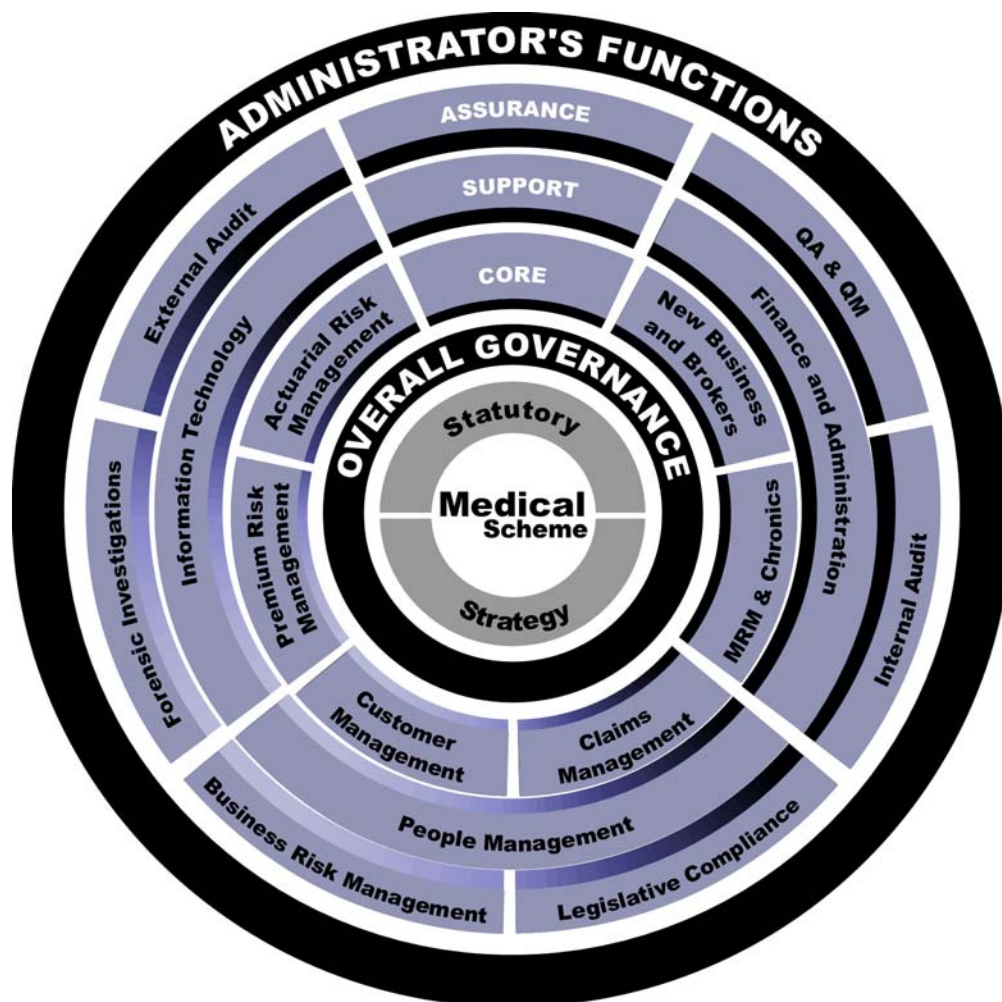
Manageability Scale:

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2. Risk Identification

The key processes/business units, which support the medical scheme's operations, *could be* depicted as follows:



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2.1

Please indicate the areas that are within your environment and include any additional, which are not referred to.

Space is also provided in the table for an weight rating. This rating refers to how critical you consider this business unit/function within your environment:

		Key roles	Applicable?		Importance
			Yes	No	
<i>Governance</i>	Strategy	Research and development			
	Statutory	Trustee responsibilities			
	Other?				
<i>Core</i>	Actuarial Risk Management	Forecasting and actuarial functions			
	Premium risk management	Collection of premiums and debtor management			
	Customer management	Call centre and customer relationship initiatives			
	Claims management	Claims payments and assessing			
	Medical risk management and chronic benefits	Pre-authorisation of hospital intake and chronic medication applications			
	New business and brokers	New member take-on and broker management			
	Other?				

Continued...

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		Key roles	Applicable?		Importance
			Yes	No	
<i>Support</i>	Finance and administration	Regular financial reporting and reconciliations			
	People management/ HR	Staff utilisation optimisation and succession planning			
	Information technology	Key support systems and systems development			
	Other?				
<i>Assurance</i>	Quality assurance or management	Daily monitoring and feedback of key transaction processes, e.g. ISO9000			
	Internal audit	Objective assessment of risks			
	Legislative compliance	Compliance with the Medical Schemes Act and regulations			
	Risk management	Proactive risk management assistance and coaching			
	Forensic investigations	Fraud detection and prevention			
	External Audit	Statutory reporting and ad hoc assignments, e.g. GAAP			
	Other?				

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2.2

The section below provides details on possible risks that could be encountered within each of the areas identified above.

Each risk should be assessed based upon two criteria, viz. severity and likelihood. It is important to note that these scores should exclude current controls in place within your organisation (i.e. absolute risk). The following definitions of severity and likelihood apply:

Severity - The financial loss and sustainability of key operations in the event of the risk being realised.

Likelihood - The likelihood of the risk occurring assuming *no control in place*.

Example:

Area	Risk	Severity	Likelihood
Information Technology	Failure to continue business activities in case of a disaster, as a result of a lack of a disaster recovery plan.	5	1

Severity Scale:

5 = Catastrophic.....4 = Major.....3 = Moderate.....2 = Minor.....1 = Insignificant.....0 = N/A

Likelihood Scale:

5 = Almost certain.....4 = Likely.....3 = Moderate.....2 = Unlikely.....1 = Rare

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Area	Risk	Severity	Likelihood
Governance And Statutory	Senior management have not taken responsibility in developing long to short-range business plans that will allow the medical scheme's mission and goals to be achieved.		
	Control mechanisms to ensure compliance with governing legislation are not in place.		
	The scheme does not address existing corporate governance standards and other oversight body recommendations.		
	Management has not established its own systematic risk assessment framework that is applied on a consistent basis.		
	Unauthorised/authorised personnel have access to financial/medical information.		
Actuarial Management	<p>The following 5 criteria are not considered in actuarial based calculations:</p> <ul style="list-style-type: none"> • <i>Asset risk</i> The risk of adverse fluctuations in the value of assets. • <i>Underwriting risk</i> The risk that premiums will not be sufficient to pay for services or claims. • <i>Credit risk</i> The risk that providers and plan intermediaries paid through reimbursement methods that require them to accept utilisation risk will not be able to provide the services contracted for and the risk associated with recoverability of the amounts due from reinsurers. • <i>Business risk</i> The general risk of conducting business, including the risk that actual expenses will exceed amounts budgeted. • <i>Economic risk</i> The risk that is inherent to the South African economy for e.g. the Dollar/Rand exchange rate fluctuations and interest rate fluctuations. 		

Continued...

Severity Scale:

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Area	Risk	Severity	Likelihood
Premium Management	Incorrect premiums charged to members.		
	Premiums received are not correctly allocated resulting in: <ul style="list-style-type: none"> • Members receiving none/inadequate benefits • High incidences of client queries and dissatisfaction. 		
	Outstanding debtors are not properly managed, in terms of: <ul style="list-style-type: none"> • Ageing of debtors • Reconciliation's • Follow-up of debtors and tracing accounts. 		
	Member withdrawal debt (clawback) is not pro-actively managed and followed-up resulting in high cost to the scheme in terms of debt collection and legal costs.		
	Incorrect or unauthorised premium refunds resulting in loss of income for the scheme.		
	Lapses and suspensions are not followed-up timeously resulting in losses for the scheme.		
Customer Management	Non-achievement of service level agreements and customer expectations, in terms of: <ul style="list-style-type: none"> • Call centre management • Provider relations • Marketing initiatives • Public relations and reputation management. 		
Claims Management	Performance in terms of key claims operations are inadequate.		
	Inadequate system input standards are not in place.		
	Lack of controls with regard to collection and insufficient tracking procedures of claims.		
Medical Risk Management	Incorrect pre-authorisation procedures when loading in-hospital events.		
	Lack of concurrent and retrospective case management.		
	Insufficient bill audit review process.		
	Lack of understanding and application of preferred provider arrangements.		

Continued...

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Area	Risk	Severity	Likelihood
Chronic Benefits	Members exceed their benefit allowances.		
	Suitable monitoring controls are not in place to assess the member's needs for Chronic medication on a regular basis.		
	Suitable checks are not conducted to ensure that medicines applied for are not in contradiction with one another.		
	Not all Chronics applications loaded are supported by an authorised application form.		
	Little/no controls in place to effectively monitor the decisions made by pharmacists.		
New Business & Brokers	New Business applications are not distributed to all outbound activities and services timeously.		
	Underwriting of new members not compliant with medical aid rules.		
	Premiums quoted disagree to actual premiums charged.		
	Performance in terms of key broker commissions operations is inadequate.		
	No accreditation process for brokers.		
Information Technology	The existing system development methodology does not address all key control areas expected within a systems development environment.		
	The non-measurement and ongoing monitoring of system capacity resulting in key applications being unavailable.		
	Uncontrolled logical access to systems may result in unauthorised admittance to confidential data.		
	Loss of productivity due to user problems not being addressed timeously.		
	Uncontrolled access to the high risk IT premises may result in damage to company resources.		
	Failure to continue business activities in case of a disaster, as a result of a lack of a disaster recovery plan.		
People Management	Sufficient human resources are not in place to achieve business objectives.		
	Appropriate orientation and ongoing training is not provided to set/maintain the knowledge and skills of all personnel.		

Continued...

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Area	Risk	Severity	Likelihood
Finance and Administration	The finance department does not reconcile or follow-up outstanding items on reconciliations between all systems and the general ledger on a frequent basis.		
	Adjusting journals and journal descriptions are not controlled and the necessary authorisation is not obtained.		
	No formal budgeting system in place and/or monitoring of expenses.		
Assurance Services	Assurance services do not address existing corporate governance standards and other oversight body recommendations.		
	No formalised process in place to provide formal recommendations to management on weaknesses identified.		
	No formalised process in place whereby follow-up occurs on reported items to management.		
	Assurance services have not established their own systematic risk assessment framework that is applied on a consistent basis.		
Other?			

Comments:**Severity Scale:**

5 = Catastrophic.....4 = Major.....3 = Moderate.....2 = Minor.....1 = Insignificant.....0 = N/A

Likelihood Scale:

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3. Risk Management Continuum

3.1

Under each of the areas of risk management and risk management and corporate risk management in the table below are certain factors that are characteristic of each of these stages. Use the progress scale of 1 to 10 at the bottom of the table to indicate where you believe your organisation stands on the risk management continuum.

	Awareness		Risk Management				Corporate Risk Management			
	→									
<i>Focus</i>	Financial risk		Financial and internal controls		Risk		Risk			
<i>Benefits</i>	Risk awareness		1. Improved business knowledge		1. Risk anticipated better than competitors		1. Capitalise on market opportunities			
2. Uncertainties evaluated			2. Linkage between risk management and line operations management		2. Risk managed as integral part of business management					
			3. Risk-reward decisions receive more attention		3. Improved capital and resource allocation		3. Risks aggregated to reduce risk transfer costs			
			4. More effective risk-based decision making		4. Risk transparency with stakeholders		4. Risk management integrated with business planning strategy			
<i>Capabilities</i>	Risk Identification		1. Common Risk language adopted		1. Uniform risk management process		1. Enterprise wide task strategies			
			2. Dedicated risk management resources		2. Roles and responsibilities defined		2. More objective risk measurement			
			3. Risk management policy		3. Risk management policy followed by all		3. Integrated risk management systems			
			4. Risk drivers identified		4. Risk measurement		4. Risk measures integrated with business performance and incentives			
					5. Consistent risk reporting		5. Continuous feedback			
					6. Risk management tolerances initiated					
<i>Progress</i>	1	2	3	4	5	6	7	8	9	10
<i>Mark here (X)</i>										
<i>Comments?</i>										

4. Uniform Process

4.1

The table below details the steps usually followed in a generic corporate risk management process (stages 1 to 6). Please include the relevant scores in each of the columns below for your respective organisation:

<i>Stage</i>	<i>Sub section</i>	<i>Importance</i>	<i>Implementation status</i>	<i>Difficulty in implementing</i>
1. Implementation feasibility	Top executive commitment and priority.			
	Sufficient buy-in from all other levels of management.			
	The environment is one of open sharing and regular feedback and escalation.			
	Systems and data are in place to provide timely information to management.			
2. Adopt goals, objectives and oversight	A risk management vision or policy is established and communicated to the entire administration company.			
	An organisational oversight structure is implemented such as a risk management committee.			
	Clearly defined roles and responsibilities for identification, management and reporting of risk.			
3. Adopt common language	Common language for standard terminology is implemented, e.g. common definition of risk in place.			
	Risk tolerances indicating acceptable levels of risk for the administrator and scheme trustees have been determined.			

Continued...

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Implementation Status:

>8 = Managed/optimised.....7.....6 = defined.....5.....4.....3 = repeatable.....2.....1 = initial/rudimentary

Difficulty in Implementing:

>8 = Major restructuring required.....7.....6 = six to twelve months management attention needed.....5.....4.....3 = 1 to 3 months management attention.....2.....1 = no problems encountered

Stage	Sub section	Importance	Implementation status	Difficulty in implementing
3. Adopt common language	A risk framework exists that identifies broad risk types, which are relied upon when conducting routine assessment within operations (e.g. a risk template).			
4. Establish risk management strategies	Approved risk management strategies have been determined and sanctioned by the administrator and trustees, e.g. Avoid, Retain, Reduce Transfer, and Exploit.			
	Trustees in conjunction with senior management have defined acceptable levels of risk that are measured against when routine assessments are conducted.			
5. Adopt uniform process	A consistent uniform process for identifying and managing existing risks is in place and has been suitably communicated.			
6. Continuous improvement and lessons learnt	Consolidated reporting for trustees and board members is in place that provides feedback on highrisk areas.			
	Communication and training, e.g. communication of risk management guidelines to trustees, senior management and operations.			
	Embedding risk management into existing processes and activities and the implementation of self-assessment systems.			
	Integration of other assurance and risk management activities across the organisation, e.g. internal audit, rely on risk management assessments.			

Continued...

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Stage	Sub section	Importance	Implementation status	Difficulty in implementing
6. Continuous improvement and lessons learnt (Continued)	To ensure success a Pilot of the implementation process has been conducted of areas and lessons learnt, derived from the pilot session.			
	Utilising internal benchmarking practices in cases where processes are repeated within the administration function across various geographical locations.			
	Design of mechanisms for sharing information on risks, viz. lessons learnt.			
	Utilising risk management experts to assist in ensuring that the current risk management methodologies comply with best practice, e.g. 'big five' consultants.			
	Corporate risk management proactively involved in new projects and new strategy initiatives.			
	Employee yearly appraisals consider risk management criteria when awarding salary increases and promotions.			
	Consolidated reporting of the schemes key risks exists and is relied upon by the trustees and management at regular intervals, e.g. use of risk management software such as CURA, Risk Advisor, etc.			

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4.2

In quantifying the extent of risk, the following types of techniques are usually noted:

<u>Degree of Sophistication</u>	<u>Risk Quantification Technique</u>
High	Statistical analysis e.g. Value at Risk (VaR), Montecarlo Simulation
	Scenario planning
	Delphi method
Moderate	Exposure and volumetric measurement
	Risk Mapping
	Risk indicator analysis
Low	Group Facilitated qualitative prioritisation
	Individual qualitative self-assessment

Please indicate below whether these are being applied in your organisation, and if so, their associated importance and implementation status:

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	<i>Applicable</i>		<i>Importance</i>	<i>Implementation status</i>
	<i>Yes</i>	<i>No</i>		
Individual Qualitative self-assessment				
Group facilitated qualitative prioritisation				
Risk indicator analysis ¹				
Risk mapping ²				
Exposure and volumetric measurement ³				
Delphi method ⁴				
Scenario planning ⁵				
Statistical analysis, e.g. value at risk, etc.				
Other?				

¹ This technique utilises decision aids to help users identify and evaluate qualitative risk factors. Decision aids typically provide a summary of questions that depending on the response, suggest possible symptoms or “red-flags”.

² Assessment of risk based on likelihood and severity.

³ What is the cost or benefit of the risk after all likely risk transfer strategies and opportunity exploitations have been considered.

⁴ Appointment of a panel of experts to consider possible risks and associated measures. The subsequent coordination of results to prepare a composite list that is then returned to the experts for comparison with their initial lists.

⁵ Management utilises scenarios to discuss their current plans, examine current results against possible futures and explore the risks and opportunities that may occur.

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ANNEXURE B

SAMPLE CORPORATE RISK MANAGEMENT POLICY⁶

It is the policy of this healthcare administrator to adopt a common approach to the management of risk. This approach involves a clearly stipulated strategy defining the risks that the administrator is in business to take and those that it is not.

Our approach is as follows: Corporate risk management is the structured process of identification, assessment and continuous managing of the combined risks that affect our values.

The foundation of this policy is the obligation and desire to protect:

- Our members;
- The environment in which we operate; and
- Our position as provider of the highest quality services.

Our policy in respect of these foundation attributes is that physical, financial and human resources will be applied to ensure our standards of product achieve and exceed expectations – no other priority will be more important.

It is also our policy that to achieve the economic expectations of our stakeholders, the organisation must pursue opportunities involving a certain degree of risk. Our policy is to give full and due consideration to the balance of risk and reward, as far as practicable, to optimise the rewards gained from our business activities.

The application of this policy will be the responsibility of the Board through the Chief Executive Officer. The Chief Executive Officer and Executive

⁶ Adapted from source: DeLoach, 2000

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Management team is responsible for the implementation of this policy through a risk management programme. Reporting of performance against policy and strategic targets will be conducted routinely depending on the nature of the risks.

This strategy is supported by analytical techniques to identify and evaluate risk, control and response measures to improve/optimize the scheme's risk profile and key performance indicators and communication techniques that apply across and upwards through the organisation. This policy and underlying strategies will be reviewed annually by the Board of Trustees to ensure its continued application and relevance. An independent review of the adoption and effectiveness of this policy will be undertaken prior to the Board's review on a semi-annual basis.

The organisation is committed to the philosophy of effective business risk management as a core managerial capability.

Signed and dated:

Chief Executive Officer

On behalf of Trustees

ANNEXURE C

SAMPLE RISK MANAGEMENT COMMITTEE CHARTER

The Board should make use of generally recognised risk management frameworks in order to maintain a sound system of risk management. Recognised risk management initiatives include the following three scopes of work:

1. Safeguard the company's assets and investments.
2. Support business objectives and sustainability under normal as well as under adverse operating conditions.
3. Behave responsibly towards all stakeholders having a legitimate interest in the organisation.

The quality, integrity and reliability of the organisation's risk management are delegated to the risk management committee ("Committee") by the Board.

Mission Statement

The Committee's key responsibilities will be to provide independent and objective oversight and to review the information presented by management on corporate accountability and associated risks⁷.

Authority

The Committee will:

1. Have access to all information it needs to fulfil its responsibilities.
2. Investigate matters within its mandate.

The Committee, in carrying out its tasks under these terms of reference, may obtain such outside or other independent professional advice, as it considers necessary, in order to carry out its duties. The Board will ensure that the Committee will have access to professional advice both inside and outside of the company in order for it to perform its duties.

These terms of reference may from time to time be amended as required, subject to the approval of the Board.

Membership

The Committee shall be chaired by the CEO with full participation of the Senior Executive Committee.

The Company Secretary shall be responsible for minute taking and overall meeting administration.

⁷ Refer page 246

Interaction with Audit Committee

The Audit Committee is a separate forum governed by its own charter that has been sanctioned by the Board.

The overall function of the Audit Committee is to ensure that management has created and maintained an effective control environment and demonstrates and stimulates the necessary respect for the internal control structure amongst all parties.

Responsibilities

The Committee will:

1. Review and assess the integrity of the risk control systems and ensure that the risk policies and strategies are effectively managed.
2. Set out the nature, role, responsibility and authority of the risk management function within the company and outline the scope of risk management work.
3. Monitor external developments relating to the practice of corporate accountability and the reporting of specifically associated risk, including emerging and prospective impacts.
4. Together with the company's legal advisor any legal matters that could have a significant impact on the company's business.
5. Review the Executive Committee's reports detailing the adequacy and overall effectiveness of the company's risk management function.
6. Ensure compliance with such policies, and with the overall risk profile of the company.
7. Review the adequacy of insurance coverage.
8. Review risk identification and measurement methodologies.
9. Monitor procedures to deal with and review the disclosure of information to clients.
10. Have due regard to the principles of governance and codes of best practice.
11. Liaise with the board in relation to the preparation of the Committee's report to shareholders as required.

Meetings

Meetings of the Committee will be held, as the Committee deems appropriate, however, the Committee should meet at least twice a year. Meetings should be organised so that attendance is maximised.

The Chairperson of the Committee or any member of the Committee may call a meeting at any other time. The Chairperson, in their discretion, may invite such executives and senior management as appropriate to attend and be heard at meetings of the Committee. In addition, the Finance Director, Chief Executive Officer and executives specifically responsible for risk in the company, including the head of internal audit, shall attend meetings of the Committee but shall not have a vote.

Proceedings

The following will apply:

1. The company's articles of association will govern meetings and proceedings of the Committee.
2. The Committee secretary shall take minutes of meetings.
3. Minutes of all meetings shall be circulated to all the members of the Committee and shall be included in the board papers for the next meeting. The minutes will also be forwarded to the Chairperson of all other board committees.

Risk

Risk in the widest sense includes market; credit, liquidity, operation and commercial risk that cover detailed combined risks such as:

1. Interest rate risk;
2. country risk;
3. fraud risk;
4. quality risk;
5. counterpart risk, including provisioning risks;
6. currency and foreign exchange risk;
7. technology risk;
8. price risk;
9. disaster recovery risk;
10. operational risk;
11. prudential risk;
12. reputation risk;
13. competitive risk;
14. legal risk;
15. compliance and control risks;
16. sensitivity risks e.g. environmental, health and safety;
17. concentration of risks across a number of portfolio dimensions;
18. investment risk;
19. asset valuation risk; and
20. others appropriate to the business that may be identified from time to time.