

RISK APPETITE

EMBED IT DEEPLY INTO YOUR
DNA

WHAT WILL YOUR ANSWER BE
WHEN THE BOSS ASKS, 'WHAT
ABOUT RISK APPETITE?'

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ABOUT THIS PAPER

There is a lot of hype about risk appetite statements, generated by regulators publishing better practice guidelines or actually prescribing risk appetite statements as a requirement. You are not alone if you find the concept quite esoteric. I often hear people asking, “What does risk appetite really mean?”; “What is its relationship to ‘risk tolerance’?”; “Is it really all that different to ‘risk attitude’?”

Perhaps you are across the concept of risk appetite and you are asking yourself the question, “Do management really want to write down their risk appetite? Some things are better left unsaid.” Or “I feel it would be a waste of time, we know our risk appetite and things are going pretty well if not great.”

Maybe you even have gone as far as documenting your risk appetite and have communicated it to staff and you are now saying to yourself “So what? What do I do with it now?”

No matter where you are on the spectrum from confused to thinking about your next move, ask yourself this question: “Are there many people in my organisation spending time on things that are unimportant to key stakeholders and not spending time managing some aspects of the business that are most important?”

The answer to this question would always be yes, the bigger question is to what degree. The greater the gap between your expectations and reality, the greater the benefit you would derive from driving an understanding of risk appetite deep into your organisation’s DNA.

If you would like more staff spending time on value-creating activities, please read on.

- **A Risk Appetite Statement ticks another compliance box on better practice risk management.**
- **You know your resources are too valuable just to tick another box. You need real value from your efforts.**
- **True value comes when risk appetite is embedded in the DNA of your organisation.**

THE CASE FOR RISK APPETITE

It is in many ways ironic that risk appetite has been a topic of strong debate from around the time of the publication of the first international standard on risk management (ISO 31000: Risk Management) in 2009 when the standard in fact did not explicitly address it. If you look back over the development of the Australian/New Zealand Standard (AS/NZS 4360: Risk Management) from 1995, through its 1999 and 2004 versions, through to its use as the base for 31000, you would not be surprised that risk appetite wasn’t addressed in the standard in 2009. Risk management, despite all its potential benefits, is still a developing field and risk appetite is one aspect many are still coming to grips with.

To tell you the truth, when I first heard the push for a defined risk appetite statement for an organisation I felt it was overkill as we already had spent plenty of time working on improving the risk criteria used for rating risks. In fact, in years past one of my favourite lines when guiding firms to improve their risk criteria was “How can we use a subjective term (could occur) to describe a subjective term (possible) when it comes to expressing the likelihood of an event occurring?” I always insisted risk criteria should clearly guide staff when rating risks.

Over time I started to notice that despite our efforts to clearly define risk criteria, the rating of similar risks across business units in larger organisations continued to vary widely. It began to dawn on me that the big difference is that the vast majority of decision makers in larger organisations are not in the room when risk criteria is being debated and decided. They simply are not given the context required to sufficiently understand and then apply the criteria so that risk rating is consistent across the organisation.

There is, however, much more to risk appetite statements than context for risk rating. If we look at two Australian examples for instance, [the governance guidelines of the ASX Corporate Governance Council](#) and [the prudential standard on risk management of APRA for financial institutions](#), it is quite evident that risk appetite is used in a much broader context of decision making. These documents relate risk appetite to management decision making in pursuit of objectives. Let’s face it, some objectives are much harder to achieve than others and will require a much higher level of risk taking accordingly. It is not a case of identifying high risks and managing them, it is a case of making a conscious decision as to whether or not to pursue certain objectives despite high risk.

Like every aspect of risk, it is seemingly easier to focus on the downside, however, understanding risk appetite is as important for ensuring your organisation takes the right opportunities. That is, takes sufficient risk to be successful in the long run. The late “systems thinker” Dr. Russell Ackoff once wrote: “The deterioration and failure of organizations are almost always due to something they did not do.”

In essence a well-articulated risk appetite statement should guide decision makers to act or not act in pursuit of the organisation’s goals. It can be an effective tool for holding yourself and your management peers to account when either you are making a rash decision or you are procrastinating on an opportunity for fear of being wrong.

The same logic can be applied when considering decision makers throughout the organisation. One of the biggest complaints I hear from commercial managers is that staff, operating within their approved roles, negotiate deals and bring them for sign-off and they have completely missed the boat on negotiating appropriate risk sharing amongst the parties. They are so focussed on the deal in pursuit of organisational objectives they have forgotten to think clearly about the limitations the deal should require. As with any deal already negotiated, it is much harder to introduce limitations and shift risk from one party to another without losing the deal or significantly devaluing it.

Ultimately a strong understanding of risk appetite across decision makers will expedite business rather than lead to remedial work on a poor deal or, worse still, a clean-up crew for train wreck of a deal gone wrong.

WHO OWNS RISK APPETITE?

The ASX Corporate Governance Council and APRA are both quite clear on who they believe “owns” risk appetite. The ASX recommends the Board sets risk appetite while APRA recommends the Board establishes the organisation’s risk appetite.

Many management teams react at least a little awkwardly at the Board setting risk appetite. Management feels they know the business and they are best placed to understand the risk taking required to achieve objectives.

While this may be the case in some or many circumstances, any shareholder or other key stakeholder of an organisation would be fair in asking: “Does not the Board understand the organisation well enough to understand the risk taking required on our behalf?”

The main problem with management setting risk appetite is that they are conflicted when making risk taking decisions. The conflicts arise from both potential movements in remuneration and from putting their tenure at risk. For example, management taking a large risk that may earn the executive team significant bonuses may not be a risk most stakeholders would want to take because of the much larger downside for the organisation.

Equally, management may be too fearful to take a necessary risk because they are concerned that if the risk is not adequately managed they will be held accountable and potentially lose their job.

Perhaps the best way to look at it is this: The Board hires and fires the CEO so in effect it is setting the risk appetite of the organisation through their choice of CEO or through the behaviour they support, condone or seek to change. Just as the CEO needs to convince the Board that a certain strategy is right for the organisation, so must the CEO convince the Board of the amount of risk the organisation should be taking.

Therefore the reality of a risk appetite statement is that management draft it and the Board either approve it or modify it according to their understanding of what is in the best interest of stakeholders.

WHAT IS THE RELATIONSHIP BETWEEN RISK APPETITE, RISK ATTITUDE AND RISK TOLERANCE?

If you have a problem understanding these terms and how they relate to each other you are not alone. To help you think about it, here are my thoughts:

Risk Capacity

This term relates to the organisation's ability to take on risk. With any risk decision we have to think about our ability to manage the core objective, to manage the uncertainty around it and to bear the consequences if the risk event does eventuate.

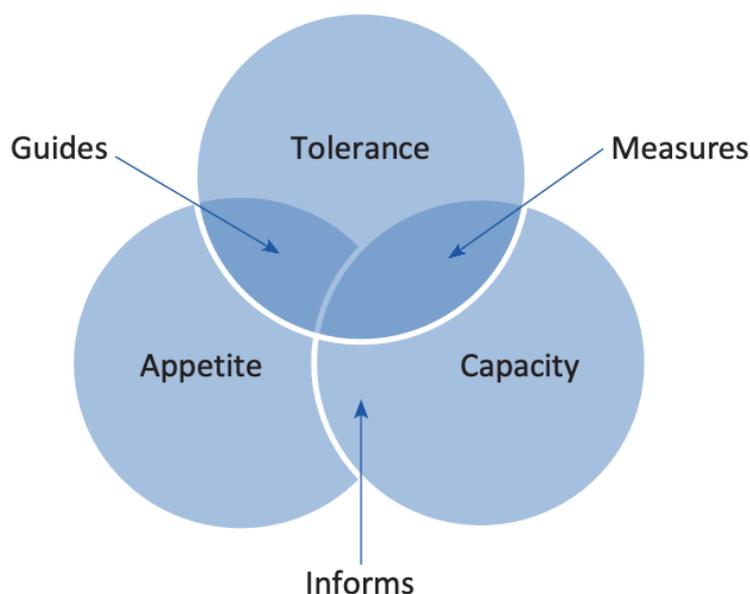
Risk Appetite

I don't see enough difference between risk appetite and risk attitude to worry about moving forward with two different terms. Risk Appetite is essentially, articulating what the line in the sand we must cross to achieve our objective, and the line in the sand we won't cross.

Risk Tolerance

This is the place to be very specific. Here we can set limits that can be measured and hence monitored with triggers in place. Risk appetite is more culture forming whereas risk tolerance is where you will often find Key Risk Indicators (KRIs) to set boundaries.

Drawing all three of these together, you can see from the diagram how capacity to manage risk informs your risk appetite which in turn guides the tolerances you set around risk taking and the measures you need to put into place to understand your capacity to manage risk which once again informs you if there needs to be a shift in risk appetite. Simple really!



WHAT CONSTITUTES A GOOD RISK APPETITE STATEMENT?

A risk appetite statement should not be too long or few will bother to read it. Therefore, it is necessarily high level, however, it must have substance. Most importantly it must be relevant to the decisions people make and how they make them. It must be closely tied to your business plan and the other fundamentals of the business. A risk appetite statement should cover:

1. The key organisational objectives
2. Other key fundamentals of the business such as financial resilience and reputation if these are not already articulated via organisational objectives. For example:
 - a. Financial – based on an assessment of reserves, ability to trade out, ability to raise funds.
 - b. Reputation – based on the power of customers, investors, owners and other key stakeholders.

You can download completed Risk Appetite Statement examples at my website [here](#).

The first imperative is to ensure you address your business objectives and other fundamentals of the business. Again, this is to guide decision making amongst staff. However, there are a few other dos and don'ts with risk appetite statements. Consider the diagram below.



Your risk appetite statement can positively affect the behaviour of staff. It can also create poor behaviour or have little affect at all, hence wasting your investment in preparing it. Your risk appetite statement cannot be fluffy as staff will see risk as less important. Make your statement bland and you have the status quo. Make your statement informative and you will strengthen your culture.

A second and much more important way you can affect your culture with your risk appetite statement is in how genuine you are in documenting the true risk appetite of the organisation. Don't forget your staff will have their "BS meters" on and if they see your statement as false it will affect morale and drive a worse culture. If you state what is convenient for management, you are missing a great opportunity to change behaviour, so be genuine. If you don't feel you can be genuine, if you don't think staff or other stakeholders are ready for the truth, you may have a bigger problem than what to put in your risk appetite statement on your hands.

NOW WHAT?

So now you have a nicely articulated risk appetite statement, what are you going to do with it? Show it to auditors, the regulator, the institutional investor, proving what a great job your organisation has done? Tick another few boxes?

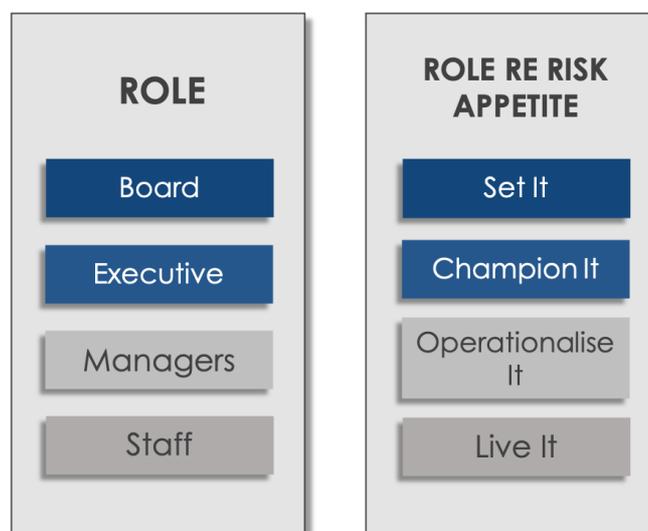
No. You are going to communicate it of course. Now herein lies the biggest problem of all with risk appetite statements. You think that just because you have a nicely articulated statement that the Board and senior management have worked hard on that when you post it on the intranet and let staff know about it that A) they will read it and B) they will understand it. Worse still, you think C) they will actually behave differently. Nothing could be further from the truth.

Let's put risk appetite statements aside for a moment and let's think about risk taking in your organisation. Do you feel that throughout the organisation your staff are balanced in their decisions on how much risk to take? Do you find some are taking silly risks while others are being too risk averse? I would be very surprised if you do not have a mixture.

If you stop and think about that for a second, you should not be surprised either. Think of all the people you know, think of the risk takers and think of the risk averse. Think of how these people have changed over time or through circumstances; once bitten twice shy. How could there not be such diversity in your organisation?

The next question is, would a risk appetite statement help reduce the volatility of risk taking across the organisation you are thinking about right now? OK, so although the concept of a risk appetite statement is esoteric, think of what it is forcing you to do: consult, discuss, agree and write down the level of risk taking the organisation needs to be successful. We all know that if we don't take risk we become increasingly irrelevant in whatever endeavour we are undertaking.

The problem is, most of your consultation and discussion has been at the top of the organisation. You may have engaged with your risk champions or with a management layer responsible for creating KRIs to invoke risk tolerances, however, what you actually need is staff not just understanding risk appetite, you want them "living it"! Consider the model below, which shows the four levels in your organisation and the ultimate role they would ideally play.

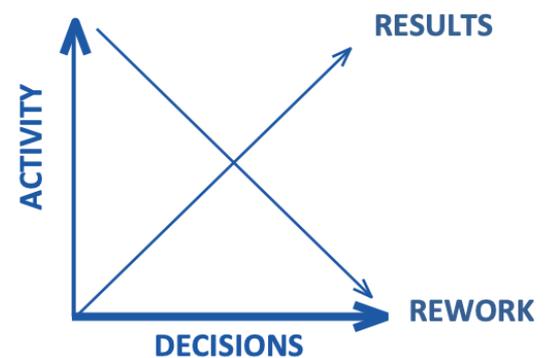


WHAT'S IN IT FOR ME AND THE ORGANISATION?

Yes, this is the crux. There is a range of research to show that the percentage of decisions staff actually get right is no better than 90 to 95% for a workplace with sound quality controls around decision making.¹ That's a lot of rework! For the more difficult, more important decisions of senior management, the success rate is no better than 50/50.² Therefore, improving the decision making of management and staff MUST be a critical success factor for your business.

While not every poor decision is made because of a lack of appreciation of risk, the existence of a clear risk appetite around a decision will ensure each decision of import is given an appropriate level of consideration.

If you have the senior executive championing risk appetite and you have managers operationalising it for staff and you have staff living it, you will see a major shift in the percentage of correct decisions being made



THE WAY FORWARD

The next steps are not the easiest, as essentially you are embarking on a significant change management program and there may well be impediments along the way. Irrespective, your goal must be to embed the risk appetite required for your organisation's success deep into the DNA of the organisation itself, deep into the subconscious of management and staff.

You know this can be achieved because you have seen other change initiatives become part of "how things are done around here".

What you need to work out is: How to capture the attention of the Executive such that they can see the need for a newly articulated, embedded Risk Appetite;

- How to create belief amongst managers that the newly articulated risk appetite will bring them and the organisation success;
- How to make it so real for staff that they acquire a deep understanding of the risks you want them to take and those you do not, and
- How to assess if you have been successful - that is, how to measure the depth of understanding of risk appetite across your organisation.

DEEP UNDERSTANDING = EMBEDDED DEEPLY INTO THE DNA

ABOUT BRYAN



Bryan is a management consultant operating since 2001. He is a specialist in risk-based decision making, strategic leadership and strategic planning born from his more than twenty years of facilitating executive and board workshops. Bryan's experience as a risk practitioner includes the design and implementation of risk management programs for more than 150 organisations across the public, private and not-for-profit sectors. Bryan is the author of **DECIDE: How to Manage the Risk in Your Decision Making**, a book for strategic leaders who wish to minimise the time taken to get to the right decision; **Persuasive Advising: How to Turn Red Tape into Blue Ribbon** that teaches you practical methods to cut through with your advice and make the impact you want to make; and **Risky Business: How Successful Organisations Embrace Uncertainty (#1 Amazon Best Seller)** that is a guide to the most successful way to design and embed an effective risk framework.

Bryan also authored the Australian Government's Risk Management Benchmarking Survey for more than 120 Government agencies from 2002-2005, lectured in the Principles of Risk Transfer in the Masters in Risk Management program of Monash University from 2002 - 2006 and designed and delivers the Risk Management Institute of Australasia's flagship Enterprise Risk course since 2019.

Bryan has assisted clients across all sectors including:

- Australian Government agencies such as the Departments of Foreign Affairs, Environment, Finance, Industry, Defence, Health and Social Services.

- State Government Agencies Fire and Rescue NSW, NSW Police, NSW Health local health districts, TAFE and the Victorian Department of Health and Human Services.
- Not-for-Profit organisations such as AWI, Cancer Council Australia, CBM, Cerebral Palsy Alliance, HCF, IRT, QSuper, Ronald McDonald House Charities, Uniting Care and Unitywater.
- Private Sector organisations such as Brisbane Airport, Brookfield Multiplex, Employers Mutual, FM Global, Downer, G&S, McConnell Dowell, Navitas, Pro Pac, QBE, Santos, Suncorp, Symbion, Weir Minerals and Xstrata.

Bryan was President and Chair of the Board of the Risk Management Institute of Australasia (RMIA) from 2013 through 2015, and is licensed by RMIA as a Certified Chief Risk Officer (CCRO).

Bryan is also a certified Virtual Presenter.

Bryan's **Consultant Profile** is attached. To hear first hand what Bryan's clients say about him, please check out this [video](#).

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