

ISO 31000:2009 & COSO ERM

Jakarta, 2018

Facilitators:

Dr. Antonius Alijoyo MBA., ERMCP., CERG., CGAP., CCSA., CFSA., CGEIT., CFE



- Ketua KomTek 03-10 BSN

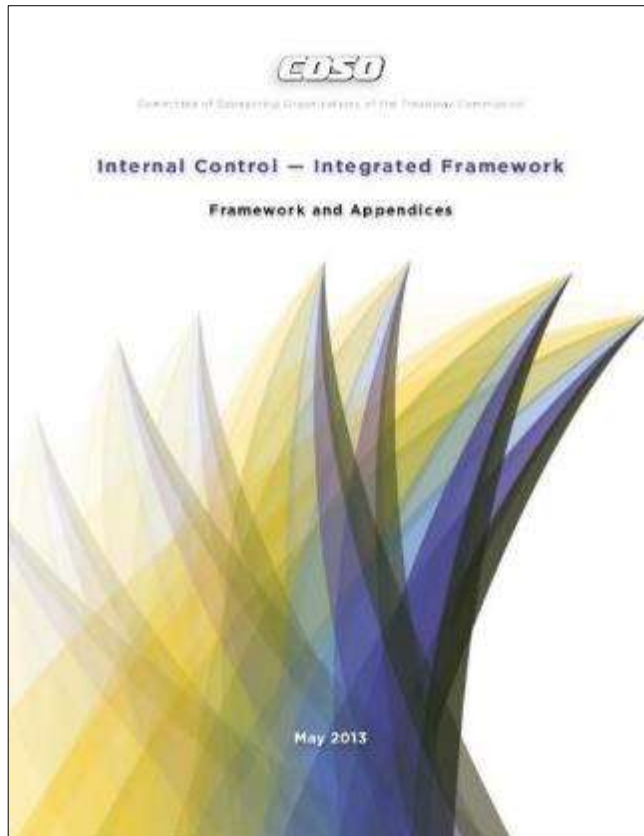


- Founder CRMS Indonesia

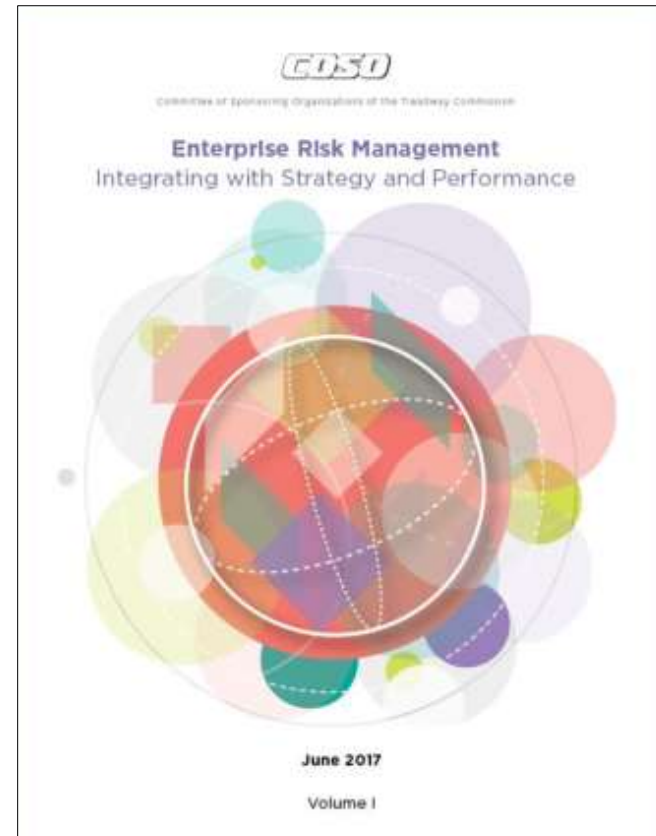


- Ketua Umum IRMAPA

2 COSO frameworks do not replace each other, are distinct, & complimentary

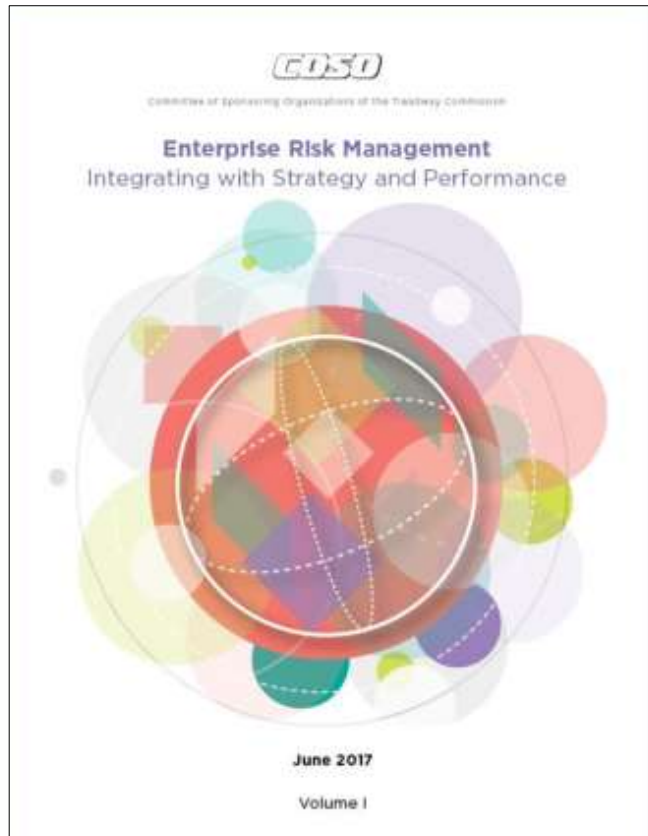


Internal Control Framework - 2013



ERM Framework - 2017

COSO ERM Framework – Integrating with Strategy and Performance



ERM Framework -2017



Explores ERM and strategy from 3 different perspectives:

- The possibility of strategy and business objectives not aligning with mission, vision, and values
- The implications from the strategy chosen
- Risk to executing the strategy

COSO ERM Framework – Integrating with Strategy and Performance

ENTERPRISE RISK MANAGEMENT



Governance & Culture



Strategy & Objective-Setting



Performance



Review & Revision



Information, Communication, & Reporting

Focuses on 5 interrelated components

1. Exercises Board Risk Oversight
2. Establishes Operating Structures
3. Defines Desired Culture
4. Demonstrates Commitment to Core Values
5. Attracts, Develops, and Retains Capable Individuals

6. Analyzes Business Context
7. Defines Risk Appetite
8. Evaluates Alternative Strategies
9. Formulates Business Objectives

10. Identifies Risk
11. Assesses Severity of Risk
12. Prioritizes Risks
13. Implements Risk Responses
14. Develops Portfolio View

15. Assesses Substantial Change
16. Reviews Risk and Performance
17. Pursues Improvement in Enterprise Risk Management

18. Leverages Information and Technology
19. Communicates Risk Information
20. Reports on Risk, Culture, and Performance

Plus, introduces 20 principles

COSO ERM Framework – Integrating with Strategy and Performance



- 1. Governance and Culture:** Governance sets the organization's tone, reinforcing the importance of, and establishing oversight responsibilities for, enterprise risk management. Culture pertains to ethical values, desired behaviors, and understanding of risk in the entity.
- 2. Strategy and Objective-Setting:** Enterprise risk management, strategy, and objective-setting work together in the strategic-planning process. A risk appetite is established and aligned with strategy; business objectives put strategy into practice while serving as a basis for identifying, assessing, and responding to risk.

COSO ERM Framework – Integrating with Strategy and Performance



- 3. Performance:** Risks that may impact the achievement of strategy and business objectives need to be identified and assessed. Risks are prioritized by severity in the context of risk appetite. The organization then selects risk responses and takes a portfolio view of the amount of risk it has assumed. The results of this process are reported to key risk stakeholders.
- 4. Review & Revision:** By reviewing entity performance, an organization can consider how well the enterprise risk management components are functioning over time and in light of substantial changes, and what revisions are needed.
- 5. Information, Communication, & Reporting:** Enterprise risk management requires a continual process of obtaining and sharing necessary information, from both internal and external sources, which flows up, down, and across the organization.

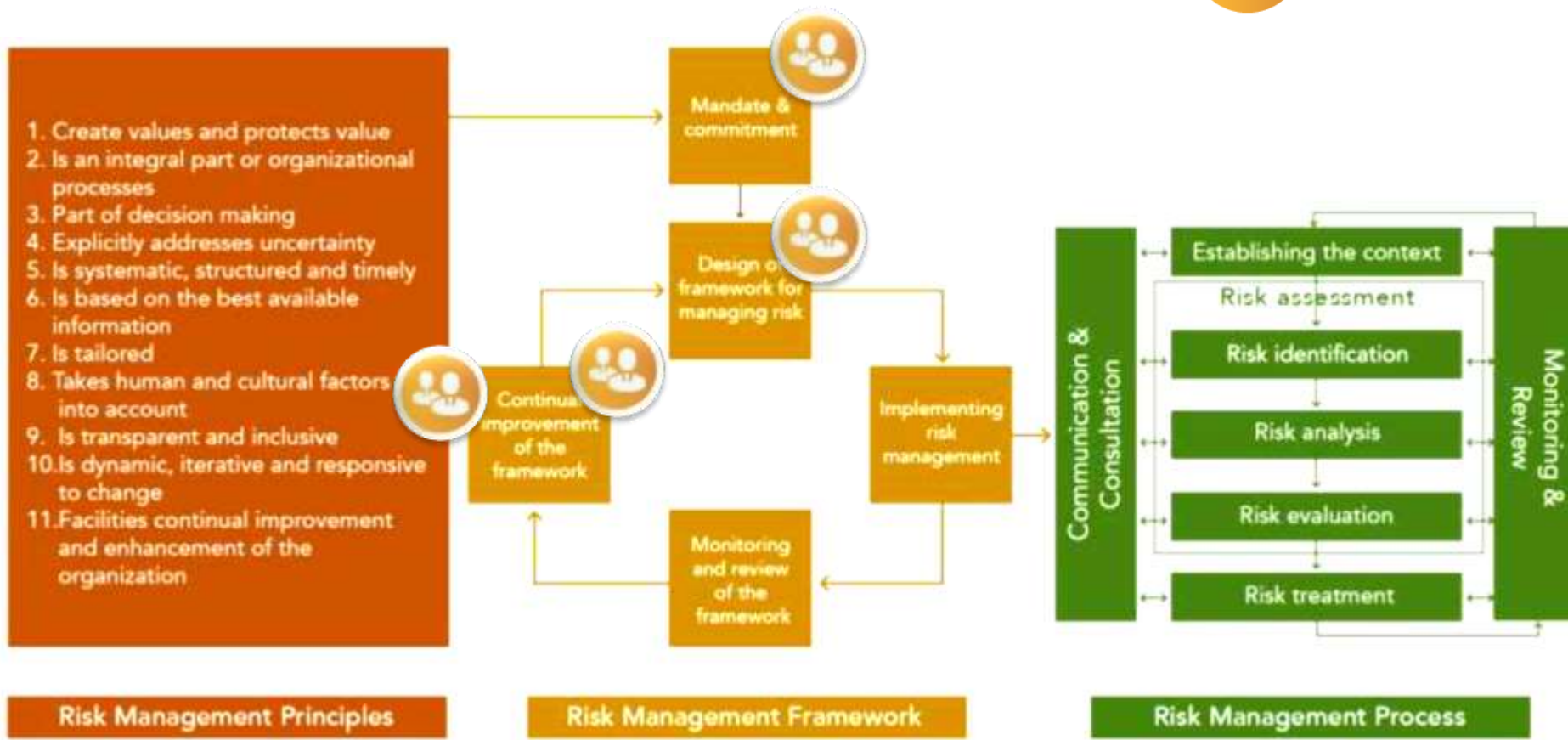
COSO ERM Framework

1. **Exercises Board Risk Oversight**—The board of directors provides oversight of the strategy and carries out governance responsibilities to support management in achieving strategy and business objectives.
2. **Establishes Operating Structures**—The organization establishes operating structures in the pursuit of strategy and business objectives.
3. **Defines Desired Culture**—The organization defines the desired behaviors that characterize the entity’s desired culture.
4. **Demonstrates Commitment to Core Values**—The organization demonstrates a commitment to the entity’s core values.
5. **Attracts, Develops, and Retains Capable Individuals**—The organization is committed to building human capital in alignment with the strategy and business objectives.



**Governance
& Culture**

COSO ERM in ISO 31000 perspective



COSO ERM Framework

6. **Analyzes Business Context**—The organization considers potential effects of business context on risk profile.
7. **Defines Risk Appetite**—The organization defines risk appetite in the context of creating, preserving, and realizing value.
8. **Evaluates Alternative Strategies**—The organization evaluates alternative strategies and potential impact on risk profile.
9. **Formulates Business Objectives**—The organization considers risk while establishing the business objectives at various levels that align and support strategy.

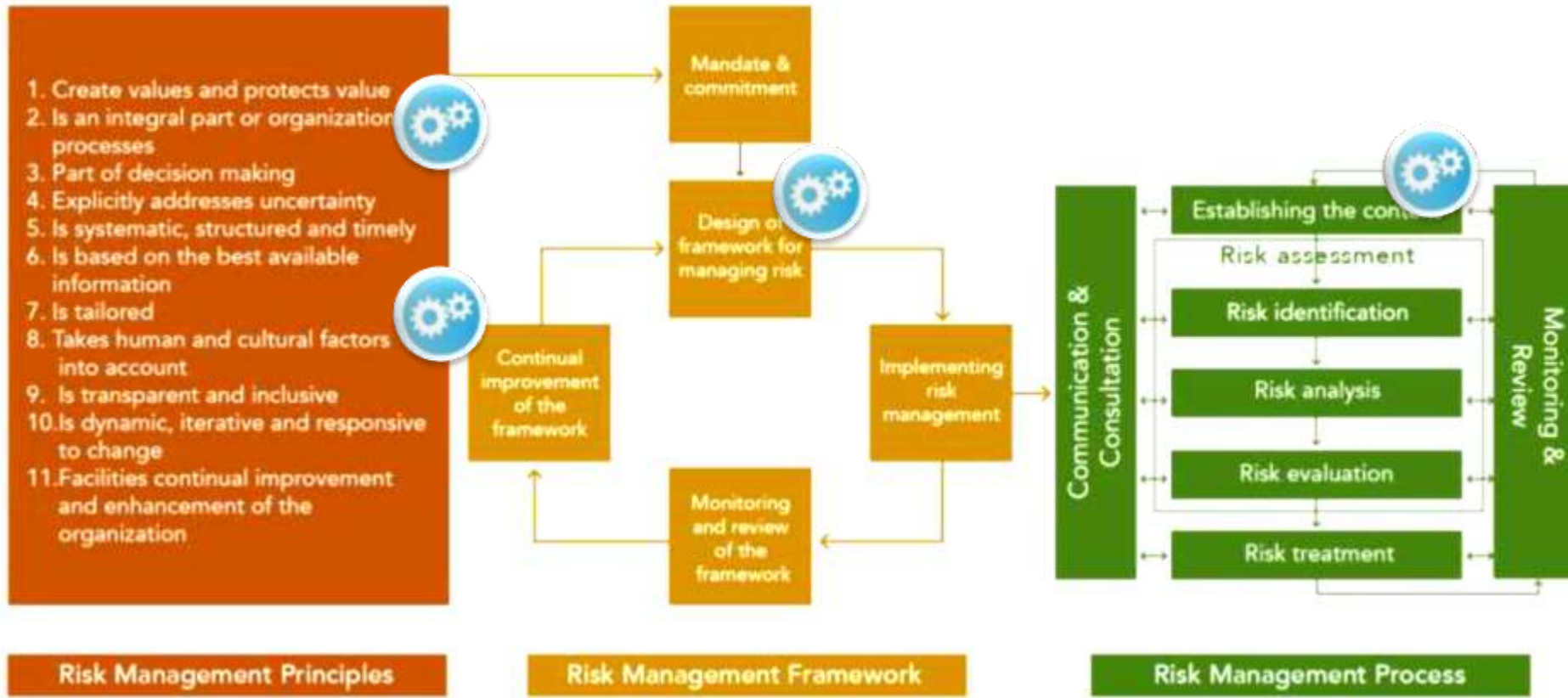


**Strategy &
Objective-Setting**

COSO ERM in ISO 31000 perspective



Strategy & Objective-Setting



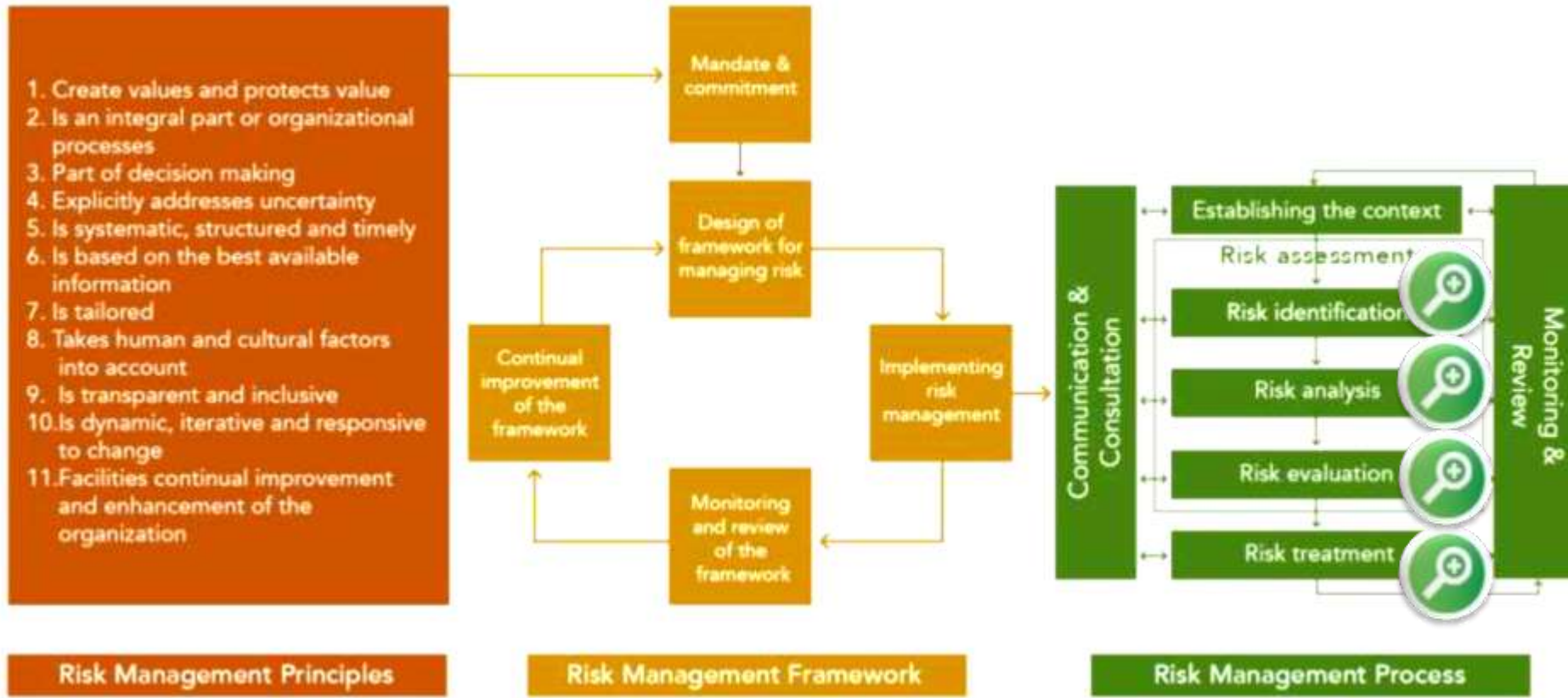
COSO ERM Framework

10. **Identifies Risk**—The organization identifies risk that impacts the performance of strategy and business objectives.
11. **Assesses Severity of Risk**—The organization assesses the severity of risk.
12. **Prioritizes Risks**—The organization prioritizes risks as a basis for selecting responses to risks.
13. **Implements Risk Responses**—The organization identifies and selects risk responses.
14. **Develops Portfolio View**—The organization develops and evaluates a portfolio view of risk.



Performance

COSO ERM in ISO 31000 perspective



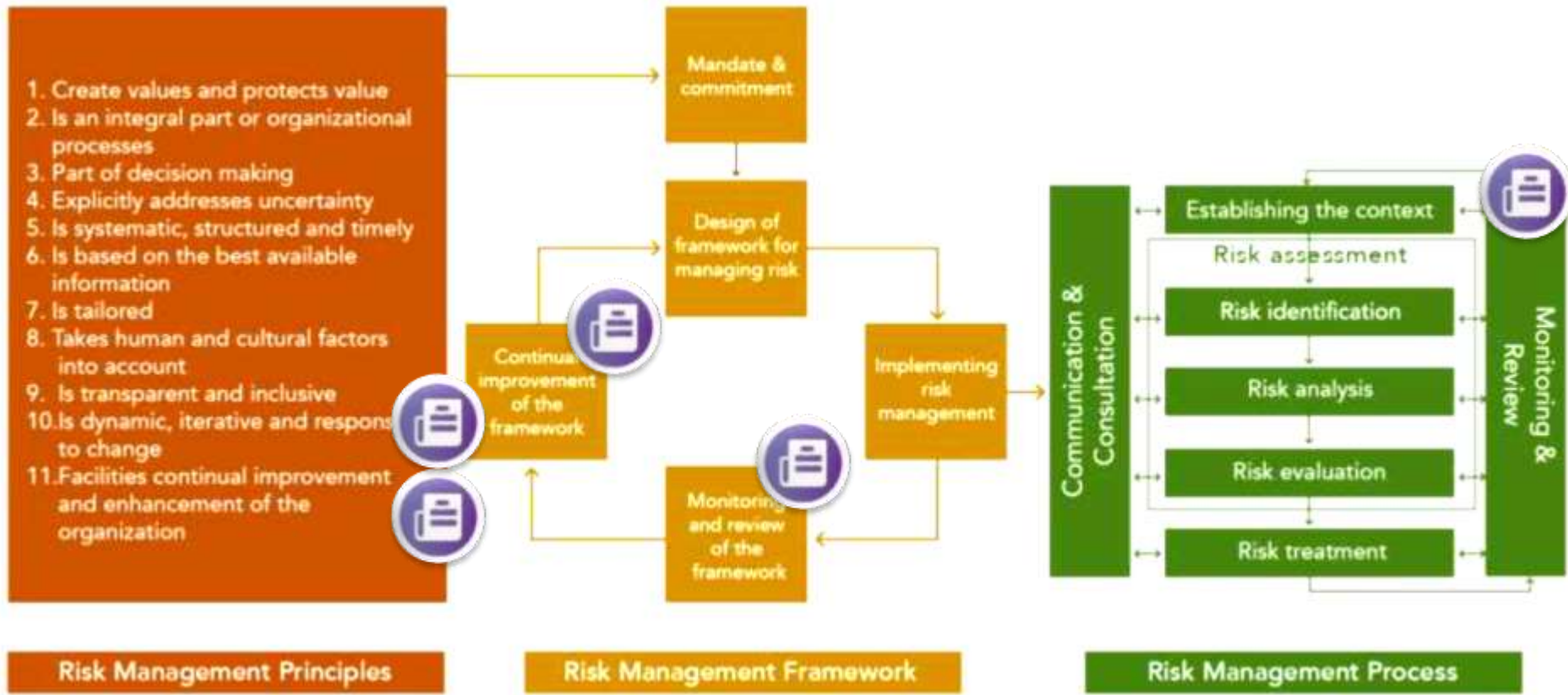
COSO ERM Framework

- 15. **Assesses Substantial Change**—The organization identifies and assesses changes that may substantially affect strategy and business objectives.
- 16. **Reviews Risk and Performance**—The organization reviews entity performance and considers risk.
- 17. **Pursues Improvement in Enterprise Risk Management**—The organization pursues improvement of enterprise risk management.



**Review
& Revision**

COSO ERM in ISO 31000 perspective



COSO ERM Framework

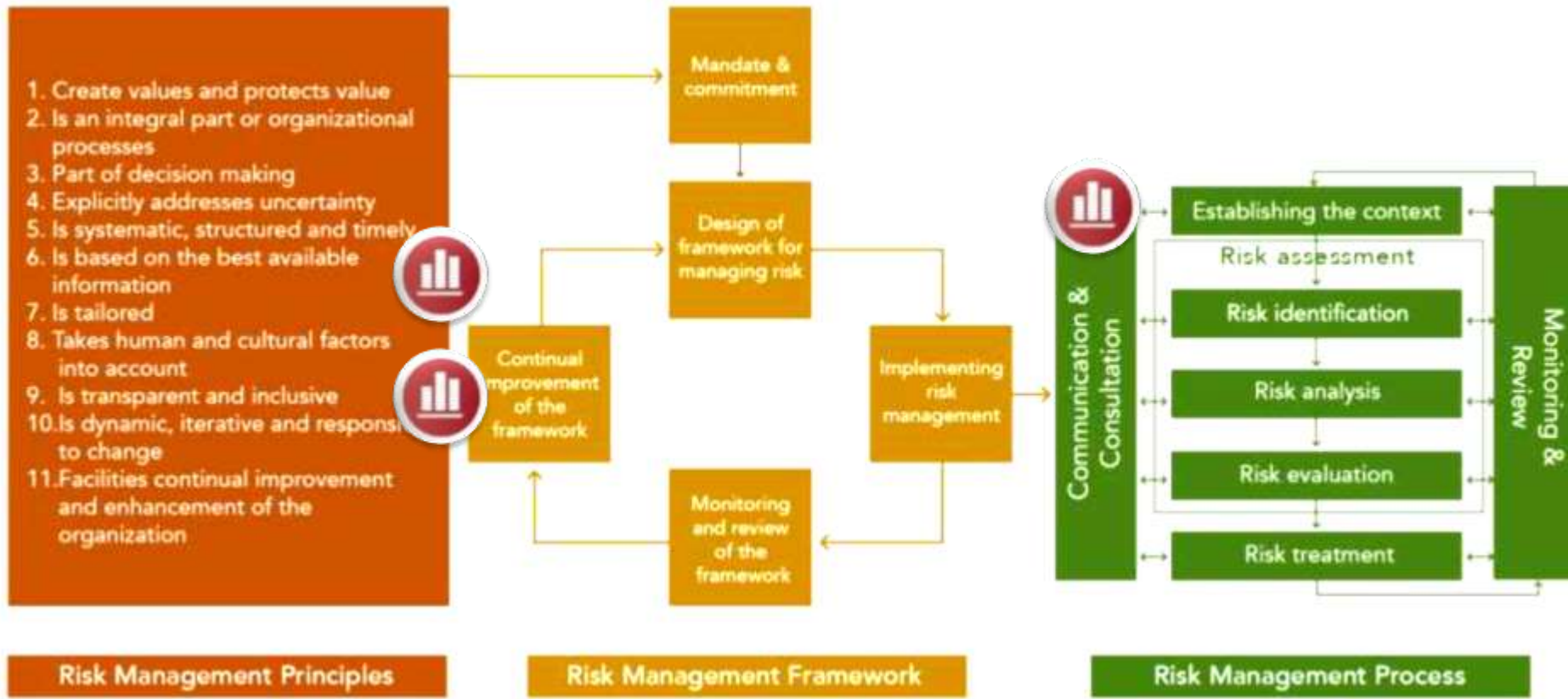


Information, Communication, & Reporting

- 18. Leverages Information Systems**—The organization leverages the entity’s information and technology systems to support enterprise risk management.
- 19. Communicates Risk Information**—The organization uses communication channels to support enterprise risk management.
- 20. Reports on Risk, Culture, and Performance**—The organization reports on risk, culture, and performance at multiple levels and across the entity.

COSO ERM in ISO 31000 perspective

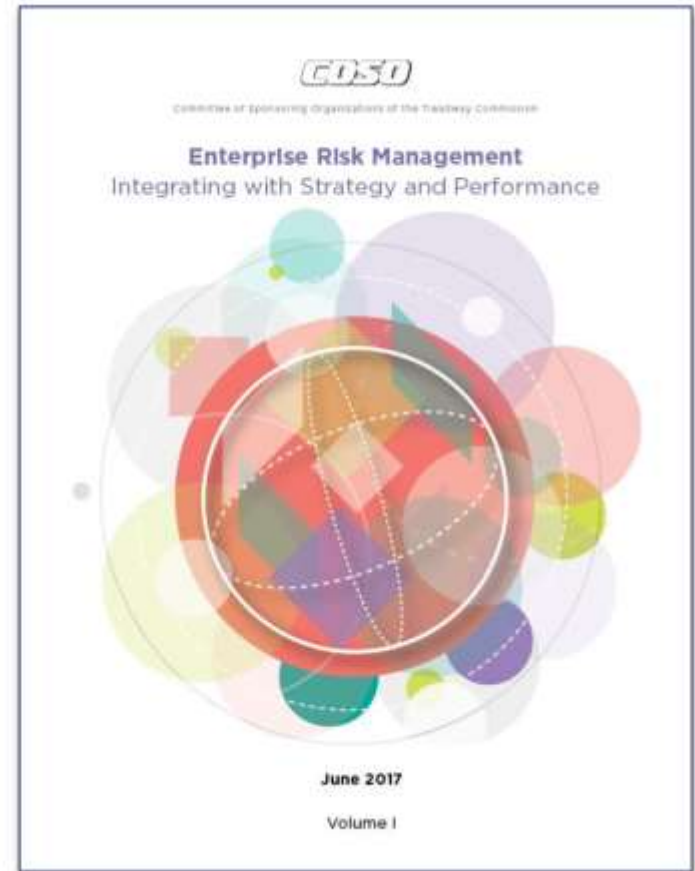
 **Information, Communication, & Reporting**



- Understanding the scope

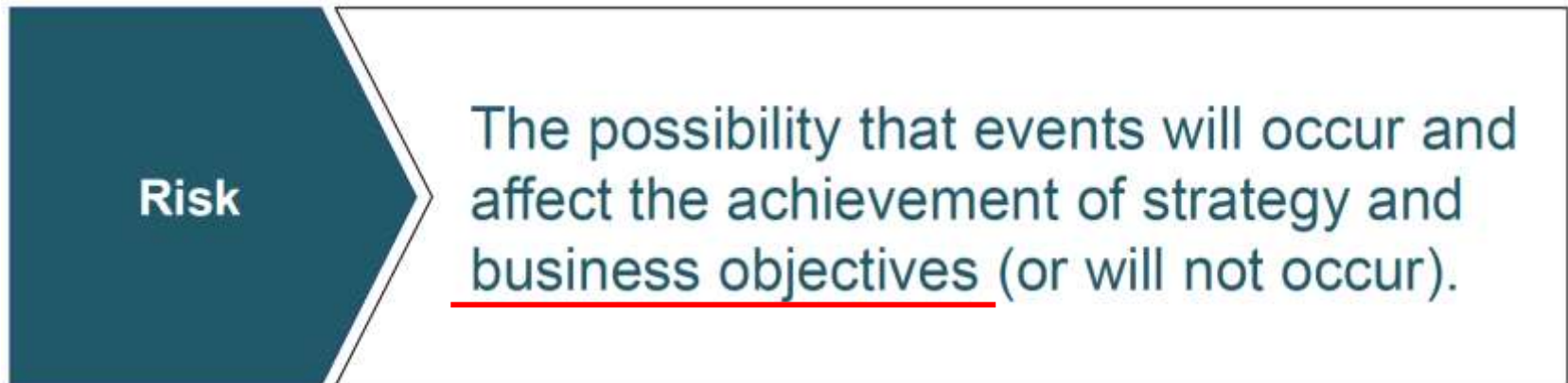
Enterprise Risk Management Framework: Integrating with Strategy and Performance

Enterprise is not the only type of organization that needs risk management (public organizations, project mgt. office, program task force).



Some Challenges with COSO ERM

- Understanding the scope



Not every organization is aiming business-oriented objectives (public sector organizations, social institutions). As a matter of fact, business objectives are only applied to profit-oriented organizations.

Some Challenges with COSO ERM

- Prerequisite to effectiveness



Not every organization has been matured enough and has a well-defined strategy in place. Moreover, there is a risk of defining a wrong strategy (which is acknowledged by COSO ERM).

Some Challenges with COSO ERM

- Prerequisite to effectiveness

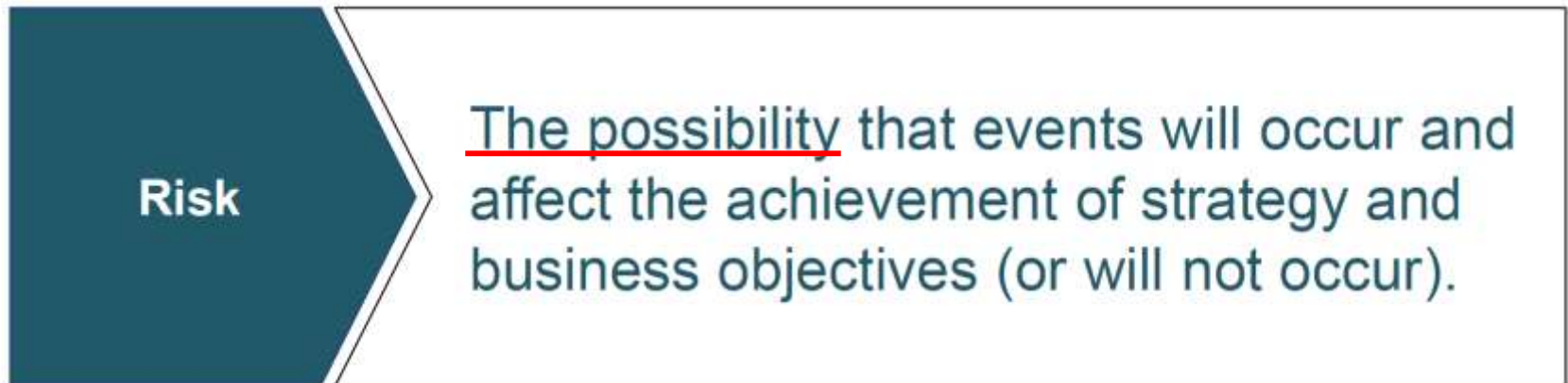
Enterprise
Risk
Management

The culture, capabilities, and practices, integrated with strategy and execution, that organizations rely on to manage risk in creating, preserving, and realizing value.

Having a sound risk management culture, and necessary capabilities to manage risk, integrated with strategy and execution will surely increase the effectiveness of risk management practices. It may not be a problem for (or to apply to) a mature organization with adequate resources, but it will in the context of organizations which don't have such privilege.

Some Challenges with COSO ERM

- Practicing the definition

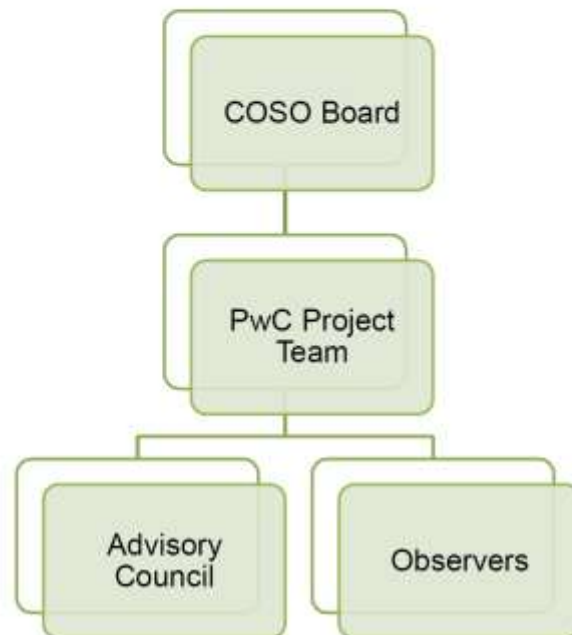


Managing the risk, or by definition, managing “the possibility that events will occur and affect the achievement of ...” might mislead the risk management to focusing only on the preventive actions, whilst in the real life a good risk management even might encourage us in taking more risks, in term of exploiting the opportunity.

- Comments from independent parties



Project Structure



PwC Project Team:

- Served as the author and project leader
- Conducted research, interviews, surveys, Advisory Council meetings, and one-on-one and group forums to capture feedback on the update
- Captured feedback from across North America, Central America, Europe, Asia, and Australia

Advisory Council and Observers:

- Consisted of over 25 professionals
- Provided input, feedback, insight, and ideas throughout the update

Source: COSO

Some Challenges with COSO ERM

- Comments from independent parties



Summary of Public Comment Feedback: Letters

- 48 letters received – many of which demonstrated considerable investment
- Comments on concepts (flawed missing, unnecessary) collectively represented less than 15% of the total number of comments received
- Greatest number of comments requested clarity of drafted content versus adding/deleting content



Source: COSO



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September 30, 2018

Robert Hirth
Chairman
Committee of Sponsoring Organizations of the
Via [upload link](#)

Re: Comments on Enterprise Risk Management

Dear Mr. Hirth,

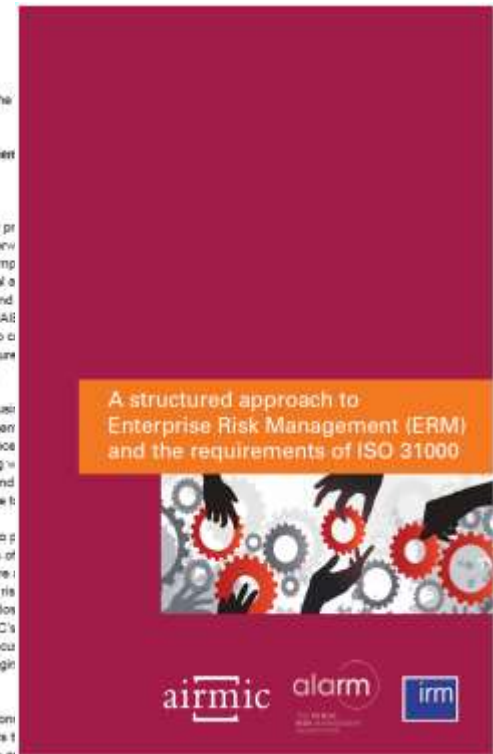
Within organizations across the globe, many professional strategic or functional leadership, or are otherwise implementation, execution, evaluation, and implementation arrangements. In addition, many professional a objective, accurate, and timely information and the Professional Accountants in Business (PAI) Accountants (IFAC) values the opportunity to o the Treadway Commission (COSO)'s Exposure Integrated Framework ("ERM Framework").

With the increased volatility in the modern business crises around the world, the effective management control—has taken on an even greater importance an organization's objectives, while complying v enables the organization to better respond and commends COSO on taking up the challenge t

IFAC also greatly values COSO's invitation to p allowed us to actively contribute to all stages of views on the effective management of risk are i Summary stating that "integrating enterprise ris growth and enhance performance by more clos opportunity." This is closely aligned with IFAC's argues that organizations should primarily focus sustainable value and growth and that manage part of that.

IFAC also supports many of the other intention Executive Summary. For example, it supports t

- Organizations need to become more a opportunities and threats.



Source: IFAC, AIRMIC, ALARM, IRM

- Comments from independent parties



September 30, 2018

Robert Hirt
Chairman
Committee of Sponsoring Organizations of the Treadway Commission
Via [upload link](#)

Re: Comments on Enterprise Risk Management—Aligning Risk with Strategy and Performance

Dear Mr. Hirt,

Within organizations across the globe, many professional accountants in business are in a position of strategic or functional leadership, or are otherwise well placed to partner with other disciplines in the implementation, execution, evaluation, and improvement of organizational risk management arrangements. In addition, many professional accountants in business have the responsibility to provide objective, accurate, and timely information and analyses to support good (risk) management. Therefore, the Professional Accountants in Business (PAB) Committee of the International Federation of Accountants (IFAC) values the opportunity to comment on the Committee of Sponsoring Organizations of the Treadway Commission (COSO)'s Exposure Draft of the update to its Enterprise Risk Management—Integrated Framework (ERM Framework).

With the increased volatility in the modern business environment and the recent financial and economic crises around the world, the effective management of risk in organizations—including good internal control—has taken on even greater importance. Effective risk management facilitates the achievement of an organization's objectives, while complying with legal, regulatory, and societal expectations, and enables the organization to better respond and adapt to surprises and disruptions. IFAC, therefore, commends COSO on taking up the challenge to update its ERM Framework.

IFAC also greatly values COSO's invitation to participate in the Advisory Council to this project, which has allowed us to actively contribute to all stages of the update process. IFAC is happy to see that many of its views on the effective management of risk are reflected in the current draft, especially with the Executive Summary stating that "integrating enterprise risk management into an organization helps to accelerate growth and enhance performance by more closely linking strategy and objectives to both risk and opportunity." This is closely aligned with IFAC's recent thought paper, *From Bullseye to Bull's-eye*, which argues that organizations should primarily focus on setting and achieving their objectives to create sustainable value and growth and that managing risk, both positive and negative, is a natural and integral part of that.

IFAC also supports many of the other intentions for the updated ERM Framework, as expressed in the Executive Summary. For example, it supports the idea that:

- Organizations need to become more anticipatory and adaptive to change, which may create both opportunities and threats.

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we are concerned that the current Exposure Draft of the ERM Framework is not yet sufficiently thought through to really shape "the culture, capabilities, and practices, integrated with strategy and execution, that organizations rely on to manage risk in creating, preserving, and realizing value."³

Arguably, the most pivotal change to be made to align the ERM Framework with the intentions as voiced in the Executive Summary would be to reverse the perspective from risk based to (strategic) objective based: placing organizational strategy and execution at the forefront and then showing how organizations could actually integrate the management of risk into their (already existing) "culture, capabilities, and practices."

Once this reversion has taken place, the various elements of the ERM Framework, such as the components and principles, will almost automatically fall into their new place: not as separate, add-on activities but as important pointers to influence the managerial processes that already exist—to enhance and improve them but not necessarily replace or increase them.

Such an approach would also correspond with the main objective of an organization, which is *not* to effectively manage risk, *nor* to have effective controls, but to ensure that it makes the best decisions and achieves its (strategic) objectives.

Align ERM Framework with other risk management standards

Various other standards, frameworks, and guidelines are available to assist organizations in evaluating and improving their risk management arrangements, on a global level most notably the standard ISO 31000:2009, Risk management – Principles and guidelines.

Many organizations, not only multinationals, use various sources for developing their risk management arrangements. Further international alignment of the underlying terms and concepts—as a minimum reconciling contradictory or conflicting recommendations⁴—would facilitate their continuous improvement efforts, reduce costs, and allow for the comparison of these arrangements across borders and thus

Source: IFAC

- Comments from independent parties



Source: AIRMIC, ALARM, IRM

Throughout the guide, the word Board is used to signify the decision-making body within an organisation. In the public sector, this body may be referred to as the Council, Executive or Authority.

There are many opinions regarding what risk management involves, how it should be implemented and what it can achieve. International Organisation for Standardisation (ISO) standard 31000 was published in 2009 and seeks to answer these questions. This guide includes a brief commentary on ISO 31000, as well as providing further information on the successful implementation of risk management. Importantly, this guide recognises that risk has both an upside and downside.

Risk management principles

Risk management is a process that is underpinned by a set of principles. Also, it needs to be supported by a structure that is appropriate to the organisation and its external environment or context. A successful risk management initiative should be proportionate to the level of risk in the organisation. For related to this also, you can read

framework for undertaking ERM. It has gained considerable influence because it is linked to the Sarbanes-Oxley requirements for companies listed in the United States. ISO 31000 was published in 2009 as an internationally agreed standard for the implementation of risk management principles.

This guide provides a structured approach to implementing risk management on an enterprise-wide basis that is compatible with both COSO ERM and ISO 31000. However, the guide places more emphasis on ISO 31000 because it is an international standard and many organisations have international operations. At the same time as publishing ISO 31000, ISO also produced Guide 73 'Risk management – Vocabulary – Guidelines for use in standards'.

Acknowledgements

Permission to reproduce extracts from ISO 31000 'Risk management – Code of practice' is granted by the BSI. British Standards can be obtained in PDF or hard copy formats from the BSI online shop: www.bsigroup.com/shop or by contacting BSI Customer Services for hardcopies only: Tel: +44 (0)20 8996 9001, e-mail:

Some Considerations in Choosing ISO 31000 over COSO ERM

- Standard development process

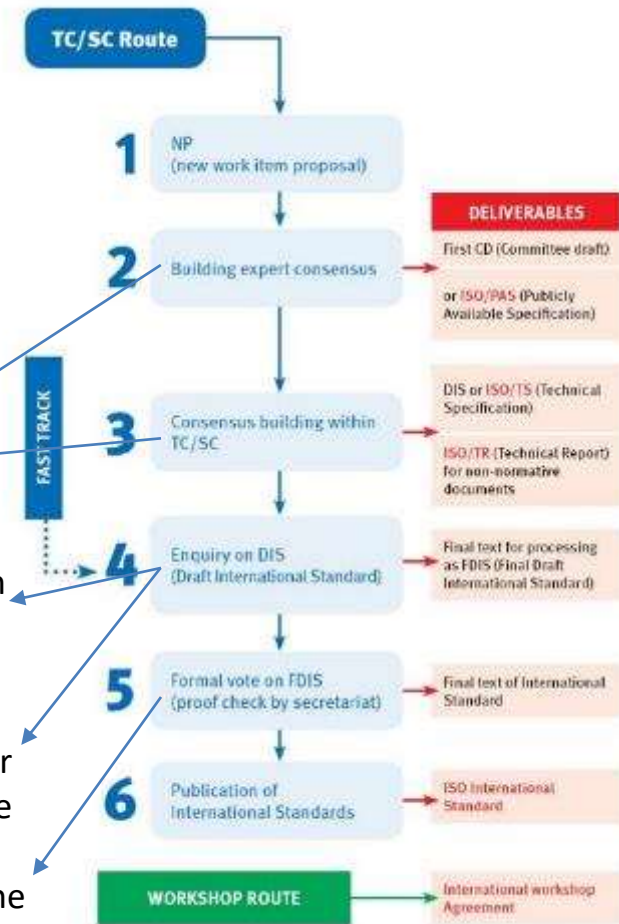


ISO/TC 262 has 54 Participating Countries and 17 Observing Countries as well as numerous liaisons. BSI in the United Kingdom is responsible for the secretariat.

The Draft International Standard (DIS) is submitted to ISO Central Secretariat by the committee secretary. It is then circulated to all ISO members who then have 12 weeks to vote and comment on it. (The submission interface should be used to submit the draft).

The DIS is approved if a two-thirds of the P-members of the TC/SC are in favor and not more than one-quarter of the total number of votes cast are negative

If the DIS is approved and no technical changes are introduced in the draft, the project goes straight to publication. However, if technical changes are introduced, FDIS stage is mandatory.



Source: ISO, TC 262

Some Considerations in Choosing ISO 31000 over COSO ERM

- Standard development process



Key principles in standard development

1. ISO standards respond to a need in the market

ISO does not decide when to develop a new standard, but responds to a request from industry or other stakeholders such as consumer groups. Typically, an industry sector or group communicates the need for a standard to its national member who then contacts ISO. Contact details for national members can be found in the [list of members](#).

2. ISO standards are based on global expert opinion

ISO standards are developed by groups of experts from all over the world, that are part of larger groups called technical committees. These experts negotiate all aspects of the standard, including its scope, key definitions and content. Details can be found in the [list of technical committees](#).

3. ISO standards are developed through a multi-stakeholder process

The technical committees are made up of experts from the relevant industry, but also from consumer associations, academia, NGOs and government. Read more about [who develops ISO standards](#).

4. ISO standards are based on a consensus

Developing ISO standards is a consensus-based approach and comments from all stakeholders are taken into account.

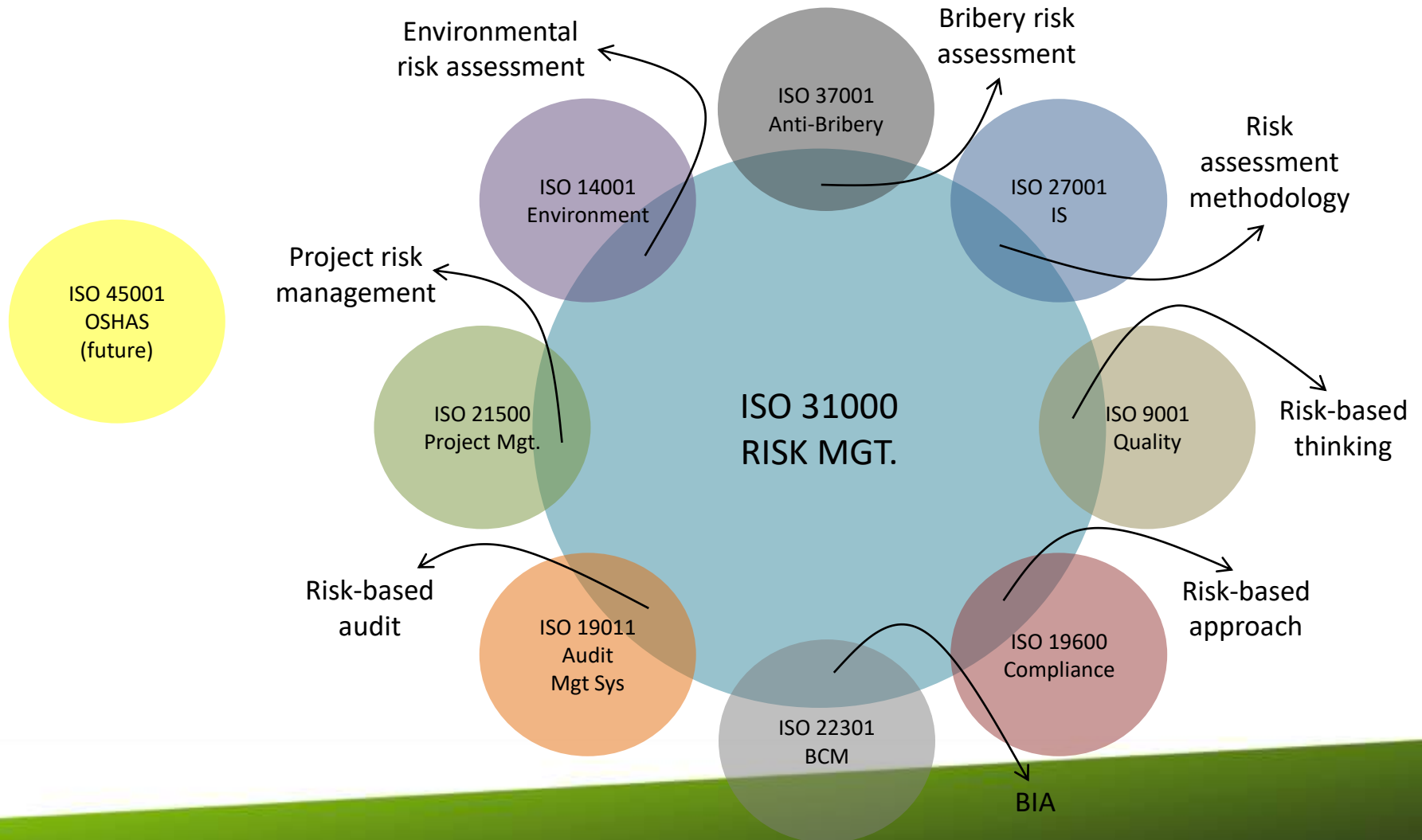
Are you involved in ISO's technical work?

Tools and publications to help guide the development of standards can be found in the [Resource area](#).

Every day of the year, around eight technical meetings take place somewhere in the world. Increasingly, electronic communications are reducing development times and travel impacts.

Some Considerations in Choosing ISO 31000 over COSO ERM

- Integration with other ISO standards

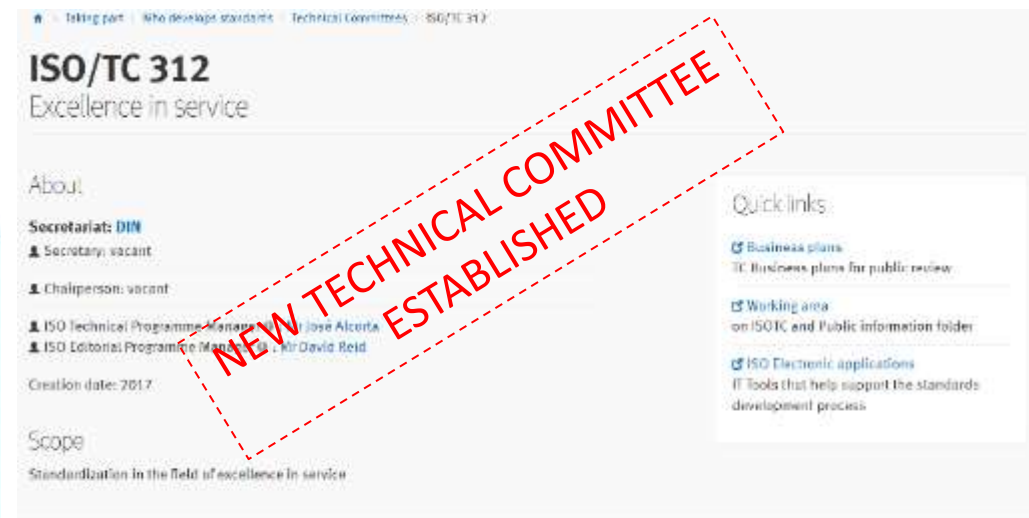


Some Considerations in Choosing ISO 31000 over COSO ERM

- Integration with other ISO standards, and supports Malcolm Baldrige criteria (KPKU)



petunjuk
penyusunan
laporan
implementasi
**Kriteria
Penilaian
Kinerja Unggul
(KPKU)**
pada
Badan Usaha
Milik Negara



ISO/TC 312
Excellence in service

About

Secretariat: **DIN**
Secretary: vacant
Chairperson: vacant

ISO Technical Programme Manager: Jose Alceria
ISO Editorial Programme Manager: David Reid

Creation date: 2017

Scope
Standardization in the field of excellence in service

NEW TECHNICAL COMMITTEE ESTABLISHED

Quicklinks:
Business plans
TC Business plans for public review
Working area on ISO/TC and Public information folder
ISO Electronic applications
IT Tools that help support the standards development process

13

Participating members

13

Observing members

Some Considerations in Choosing ISO 31000 over COSO ERM

- Compatible with and supports SPIP

PERATURAN PEMERINTAH REPUBLIK INDONESIA
NOMOR 60 TAHUN 2008
TENTANG
SISTEM PENGENDALIAN INTERN PEMERINTAH

DENGAN RAHMAT TUHAN YANG MAHA ESA
PRESIDEN REPUBLIK INDONESIA,

Menimbang : bahwa untuk melaksanakan ketentuan Pasal 58 ayat (2) Undang-Undang Nomor 1 Tahun 2004 tentang Perbendaharaan Negara, perlu menetapkan Peraturan Pemerintah tentang Sistem Pengendalian Intern Pemerintah;

Mengingat : 1. Pasal 5 ayat (2) Undang-Undang Dasar Negara Republik Indonesia Tahun 1945;
2. Undang-Undang Nomor 1 Tahun 2004 tentang Perbendaharaan Negara (Lembaran Negara Republik Indonesia Tahun 2004 Nomor 5, Tambahan Lembaran Negara Republik Indonesia Nomor 4355);

MEMUTUSKAN:

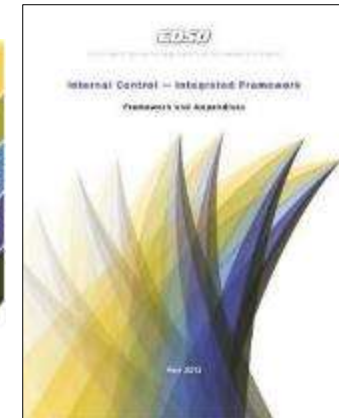
Menetapkan : PERATURAN PEMERINTAH TENTANG SISTEM PENGENDALIAN INTERN PEMERINTAH.

BAB I
KETENTUAN UMUM

Pasal 1

Dalam Peraturan Pemerintah ini yang dimaksud dengan:

1. Sistem ...

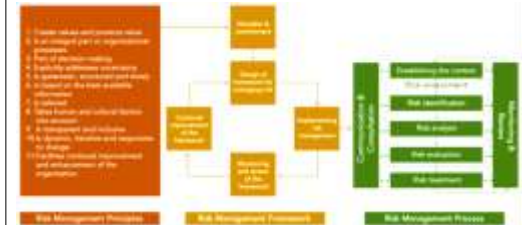
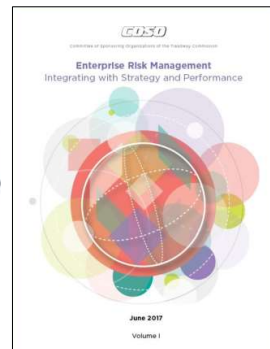
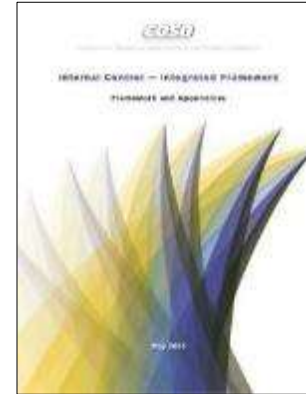


Control Environment	<ol style="list-style-type: none"> 1. Demonstrates commitment to integrity and ethical values 2. Exercises oversight responsibility 3. Establishes structure, authority and responsibility 4. Demonstrates commitment to competence 5. Enforces accountability
Risk Assessment	<ol style="list-style-type: none"> 6. Specifies suitable objectives 7. Identifies and analyzes risk 8. Assesses fraud risk 9. Identifies and analyzes significant change
Control Activities	<ol style="list-style-type: none"> 10. Selects and develops control activities 11. Selects and develops general controls over technology 12. Deploys through policies and procedures
Information & Communication	<ol style="list-style-type: none"> 13. Uses relevant information 14. Communicates internally 15. Communicates externally
Monitoring Activities	<ol style="list-style-type: none"> 16. Conducts ongoing and/or separate evaluations 17. Evaluates and communicates deficiencies

COSO Internal Control - Integrated Framework (ICIF)

Some Considerations in Choosing ISO 31000 over COSO ERM

- Compatible with and supports SPIIP



Some Considerations in Choosing ISO 31000 over COSO ERM

- Compatible with and supports SPIP

LEVEL	TINGKAT MATURITAS SPIP	INTERVAL SKOR
0	BELUM ADA	Kurang dari 1,0 ($0 < \text{skor} < 1,0$)
1	RINTISAN	1,0 s/d kurang dari 2,0 ($1,0 \leq \text{skor} < 2,0$)
2	BERKEMBANG	2,0 s/d kurang dari 3,0 ($2,0 \leq \text{skor} < 3,0$)
3	TERDEFINISI	3,0 s/d kurang dari 4,0 ($3,0 \leq \text{skor} < 4,0$)
4	TERKELOLA & TERUKUR	4,0 s/d kurang dari 4,5 ($4,0 \leq \text{skor} < 4,5$)
5	OPTIMUM	Antara 4,5 s/d 5,0 ($4,5 \leq \text{skor} \leq 5$)

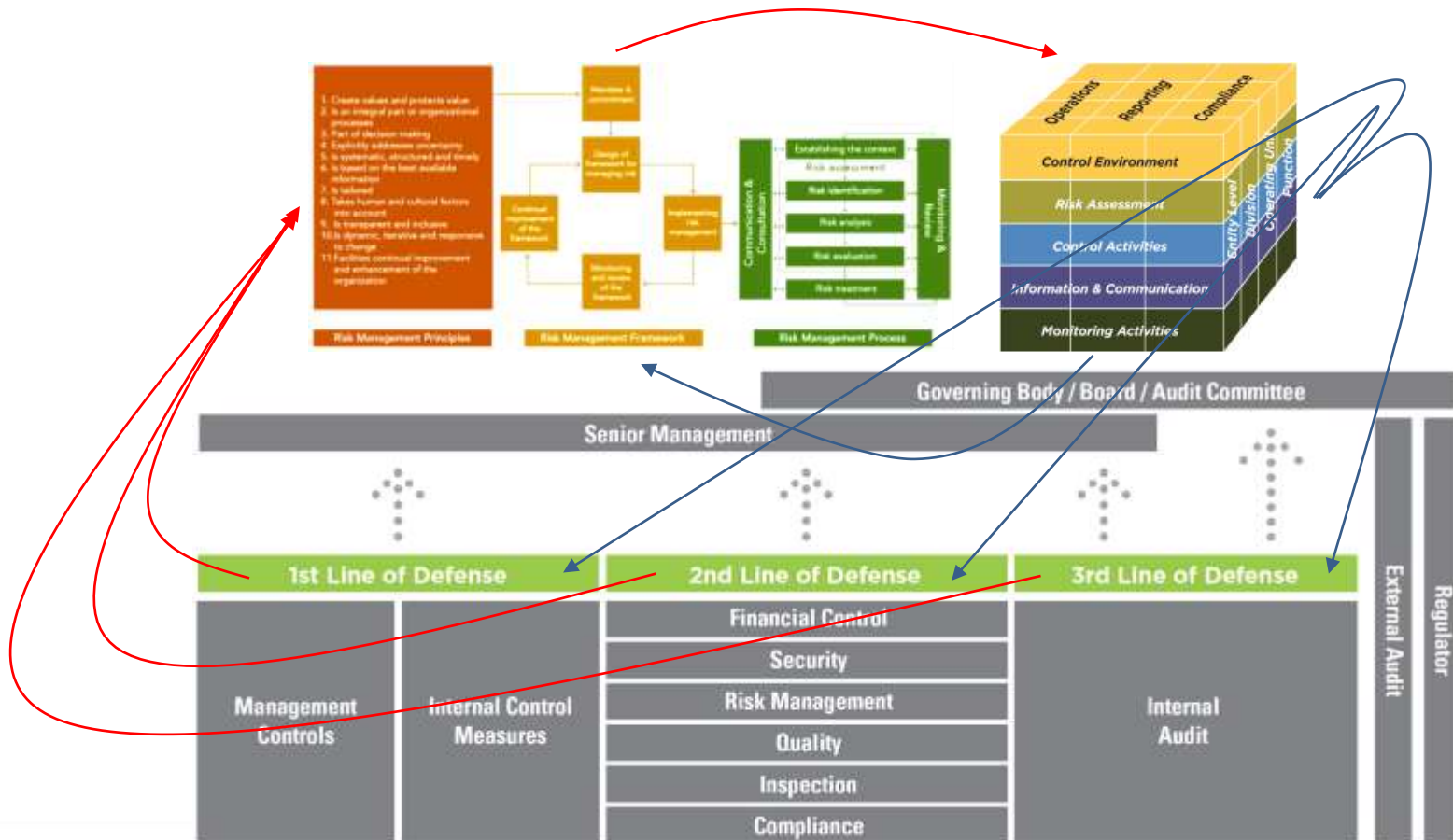
TARGET



Tingkat	Karakteristik SPIP
Level 0 Belum Ada	K/L/Pemda sama sekali belum memiliki kebijakan dan prosedur yang diperlukan untuk melaksanakan praktik-praktik pengendalian intern.
Level 1 Rintisan	Ada praktik pengendalian intern, namun pendekatan risiko dan pengendalian yang diperlukan masih bersifat <i>ad-hoc</i> dan tidak terorganisasi dengan baik, tanpa komunikasi dan pemantauan, sehingga kelemahan tidak teridentifikasi.
Level 2 Berkembang	K/L/Pemda telah melaksanakan praktik pengendalian intern, namun tidak terdokumentasi dengan baik, dan pelaksanaannya sangat tergantung pada individu, serta belum melibatkan semua unit organisasi. Efektivitas pengendalian belum dievaluasi, sehingga banyak terjadi kelemahan yang belum ditangani secara memadai.
Level 3 Terdefinisi	K/L/Pemda telah melaksanakan praktik pengendalian intern dan terdokumentasi dengan baik. Namun, evaluasi atas pengendalian intern dilakukan tanpa dokumentasi yang memadai.
Level 4 Terkelola & Terukur	K/L/Pemda telah menerapkan pengendalian intern yang efektif, masing-masing personel pelaksana kegiatan selalu mengendalikan kegiatan pada pencapaian tujuan kegiatan itu sendiri maupun tujuan K/L/Pemda. Telah ada evaluasi formal dan terdokumentasi.
Level 5 Optimum	K/L/Pemda telah menerapkan pengendalian intern yang berke- lanjut, terintegrasi dalam pelaksanaan kegiatan, serta didukung oleh pemantauan otomatis dengan menggunakan aplikasi TI.

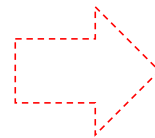
Some Considerations in Choosing ISO 31000 over COSO ERM

- Compatible with and supports SPIIP



Some Considerations in Choosing ISO 31000 over COSO ERM

- Participations & supports the endorsement of SNI





Thank You

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