



Australia's Best
Program Delivery Company

Peak Results, Delivered Together

Seven Consulting

APRA CPS230 – Operational Risk



Seven Consulting proudly supports the world-class Australian women's basketball team, the Seven Consulting Opals, currently ranked No. 2 globally, the FIBA Women's Asia Cup 2025 champions, and medal winners in the FIBA Women's World Cup 2024 and Paris 2024 Olympics. We also sponsor the Financy Women's Index, promoting gender financial equality in Australia.

Financy
Women's
Index

TEAMWORK • TRANSPARENCY • DELIVERY



Program Delivery

We deliver some of Australia's most complex and challenging agile, traditional and hybrid programs.

We work with our clients to understand their organisational and program characteristics.

These inform how we design our delivery approach to produce the best outcome for our clients. The majority of our consultants are scaled agile (SAFe) certified and manage billions of dollars of transformation programs that range in size from <\$1m to >\$500m.



PMO Services

We provide PMO establishment and management, PMO analysis, scheduling services, and tools for some of the largest organisations in Australia.

This can range from scheduling services, to running the PMO for \$1.5bn programs, to EPMO management.

All of our clients are reference sites



Change Management Services

We provide program change management, adding value from the start of an initiative through to realising benefits. We also support the integration of change management at an enterprise level to improve portfolio performance.



Delivery Consulting

We provide delivery capability uplift, sponsor and project manager training, and portfolio and program reviews to assist our clients improve their program delivery. We have successfully provided these services to over 60 clients.



Delivery Tools

Seven Consulting has developed world-leading tools to assist our clients in; portfolio optimisation, delivery approach design and weekly insights into their delivery. These tools are used successfully on over \$5bn of programs annually.

All of our clients are reference sites

Our Clients

Seven Consulting has a proven track record delivering critical outcomes for Australian organisations across industries and domains. 100% of our clients are reference sites.



Our clients and team are our top priority

Client Satisfaction Survey Results

Year	Satisfaction rating	Survey questions
Jan-Jun 2025	98.69%	5,487
2024	99.45%	11,668
2023	99.50%	11,223
2022	99.20%	13,191
2021	99.15%	15,932
2020	98.87%	14,455
2019	99.08%	14,949

100% of our clients are reference sites



"Every Seven consulting person I have ever worked with has been very good at what they do."



"Strong program delivery capability with the flexibility to scale up and down quickly to meet program and business needs. Look to continue to bring the best of the Seven ecosystem to clients to demonstrate the value-add."



"Seven is one of the most prestigious consultancies in Australia and most of the Seven Consultants I have come across at my current and previous organisation prove that."



"Good people and a focus on support from the central organisation when required."



"Very happy with the level of organisation and governance the Seven Project/Program Managers bring to our more complex initiatives."



Equity Trustees

"We have been very impressed with the capability of consultants from Seven Consulting and this has significantly uplifted our project management maturity, discipline, capability and delivery across the organisation."

Team Satisfaction Survey Results

Survey Date	Satisfaction rating
Apr'25	98.60%
Oct'24	97.56%
Apr'24	97.41%
Dec'23	95.32%
Jun'23	97.66%
Dec'22	97.82%
Jun'22	98.20%



How do we get to 98+% customer satisfaction?



People

- Over 90%+ permanent workforce, tested extensively through a robust recruitment process.
- High employee engagement.
- Hands on owners that have delivered major programs.
- Training allowances and internal learning sessions.
- Comprehensive mentoring.
- 95% SAFe® qualified and internal trainers.



Process

- Regular structured quality assurance of all assignments.
- Weekly review of all assignments' status.
- Industry leading Customer Satisfaction and NPS management.
- Bench support available at no cost to client.
- Holidays and illness cover for clients.



Tools

- Dedicated project tools team.
- Program delivery approach designed with Pathfinder.
- Delivery approach risks defined with Pathfinder.
- Schedule integrity measured with HealthCheck Tool.
- Project reporting with dashboards and scorecards.
- Portfolio Optimisation Tool.

All our clients are reference sites.

How our values impact our delivery?



Teamwork

Teamwork has to be at the core because you can't deliver big projects without great teamwork. We focus on ensuring that the Seven team, the client team and vendors work seamlessly together.



Transparency

Assumptions and poor communications kill projects, whereas openness is the foundation of good relationships and reliable delivery. We remain a completely independent consultancy.



Delivery

A strong emphasis on outcomes focuses the team and grows confidence. With a confident attitude, expert personnel and effective teams we always deliver to our client's high expectations.

Situation: The introduction of APRA's CPS230 standard was triggered by a need to strengthen operational risk management and enhance resilience within the Australian financial sector, particularly in the wake of observed control failures, disruptions, and increasing reliance on service providers.

Complication

- APRA recognized the need for a more robust and integrated approach to managing these risks, including those related to technology, third-party service providers, and global operations.
- APRA regulated entities need to be CPS230 compliant by 1 July 2025
- APRA regulated entities have until 1 July 2026 to update their service provider contracts to be CPS230 compliant

Question/What needs to be done - Key Areas of CPS230 governance

Operational Risk

Business Continuity

Service Provider Management

Governance and Reporting

Answer/How Seven Consulting can help

- Seven Consulting has a CPS230 readiness assessment tool which we can use to assess our client's CPS230 readiness and identify key gaps
- Seven Consulting can work with our clients to plan and estimate the required CPS230 compliance projects
- Seven Consulting can work with our clients to implement the required CPS230 compliance projects as quickly as possible

CPS230 is a prudential standard issued by the Australian Prudential Regulation Authority (APRA) focusing on "Operational Risk Management". CPS230 is designed to ensure that regulated entities have effective frameworks and practices in place to manage operational risks, including those related to processes, systems, and people. The standard focuses on enhancing the resilience and robustness of institutions by addressing potential risks and ensuring appropriate governance and risk management practices.

Category	Key Compliance Obligations
Operational Risk Management	Framework, incident management, Board oversight
Critical Operations	Identification, impact tolerances, resilience plans
Business Continuity	BCPs maintained, tested, updated annually
Service Provider Management	Risk management for all service providers
Material Service Providers	Board approval, monitoring, formal agreements
Incident Management	Recording, escalation, APRA notification of incidents
Governance & Reporting	Clear accountability, governance, oversight, reporting of material changes or incidents

Our approach to CPS230 compliance readiness is based on 3 steps:

- 1. Undertake a CPS230 readiness assessment, using the Seven Consulting CPS230 assessment tool*
- 2. Identify gaps and additional projects required to achieve compliance*
- 3. Implement the CPS230 projects to close the gaps and achieve compliance*

1. Undertake CPS230 Readiness Assessment

Seven Consulting would work with key SMEs from the client to assess CPS230 compliance readiness, according to the areas listed in the assessment spreadsheet

2. Identify CPS230 gaps & additional projects

Seven Consulting and the client team would identify the key gaps and estimate the time/effort/costs to remediate each gap

3. Implement CPS230 projects to address gaps

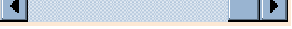
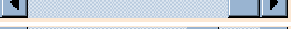
The client team would implement the process changes, controls and projects required to address the gaps. Seven Consulting can provide resources to plan, coordinate and support delivery of the projects

CPS230 – Compliance Maturity Assessment

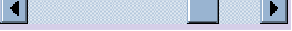
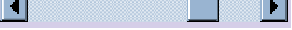
We have developed a tool to facilitate the maturity assessment process and provide guidance on the key areas that require attention (see also following two slides).

Compliance Category	Compliance Obligation / Requirement		APRA Checklist Item Ref	Relative Weight	Score	Raw Score	Weighted Score	Category Compliance
1. Governance & Accountability	1.1	Board approval for the operational risk framework	5	High		5	15	80%
	1.2	Board accountability defined for operational risk and BCP	7	High		5	15	
	1.3	Senior roles and responsibilities documented and assigned	7	High		4	12	
	1.4	Risk information reported to the Board on a regular basis	5	High		2	6	
	1.5	Tolerance levels and BCP plans approved by the Board	2	High		5	15	
	1.6	Service provider performance reviewed by the Board	5	High		3	9	
2. OpRisk Mgmt Framework	2.1	Operational risk (CPS230) integrated into the risk management framework	6	High		5	15	78%
	2.2	Operational risk profile defined and regularly updated	6	High		5	15	
	2.3	Process to identify, escalate, investigate material risks	6	High		4	12	
	2.4	Internal controls designed, tested, and documented	6	High		3	9	
	2.5	Control gaps identified and resolved in a timely manner	6	High		2	6	
	2.6	Incidents and near misses recorded and assessed	6	High		4	12	
	2.7	Risk reporting aligned with risk appetite thresholds	6	High		5	15	
	2.8	Risk impacts assessed for major decisions and strategies	6	High		3	9	
3. Critical Operations	3.1	Critical operations identified and documented	1	High		5	15	88%
	3.2	APRA-mandated critical ops categories included and confirmed	1	High		4	12	
	3.3	Dependencies for critical operations mapped and validated	1	High		4	12	
	3.4	Tolerance levels set for all critical operations (time, data loss, and service level)	2	High		4	12	
	3.5	Exclusions from critical ops documented and approved	1	High		5	15	

CPS230 – Compliance Maturity Assessment

Compliance Category	Compliance Obligation / Requirement		APRA Checklist Item Ref	Relative Weight	Score	Raw Score	Weighted Score	Category Compliance
4. Business Continuity Mgmt (BCM)	4.1	BCP documented and maintained to meet tolerance levels	9	High		4	12	69%
	4.2	Triggers and escalation steps defined in the BCP	9	High		5	15	
	4.3	Disaster recovery arrangements approved and included	9	High		3	9	
	4.4	BCP resourcing needs identified and tested	9	High		4	12	
	4.5	Internal and external dependencies documented in BCP	9	High		3	9	
	4.6	Communication strategy defined to support BCP execution	9	High		4	12	
	4.7	Severe scenarios tested through annual BCP exercises	9	High		3	9	
	4.8	BCP reviewed and updated on an annual cycle	9	High		3	9	
	4.9	Internal audit completed review of BCP effectiveness	9	High		2	6	
5. General Service Provider Mgmt	5.1	Service provider policy documented and approved	8	High		5	15	83%
	5.2	Provider onboarding and exit procedures defined	8	High		5	15	
	5.3	Risk management practices included in the policy	8	High		3	9	
	5.4	Identify fourth parties in support of critical operations	3	High		4	12	
	5.5	Identify groups/cohorts of service providers as material	3	High		3	9	
	5.6	Provider issue escalation procedures defined and tested	9	High		5	15	
6. Material Service Provider Compliance	6.1	Material providers identified and approved by management	3	High		5	15	78%
	6.2	Register of material providers created and maintained	3	High		4	12	
	6.3	MSP register submitted to APRA by deadline	3	High		3	9	
	6.4	Material contracts updated to meet CPS 230 requirements	3	High		4	12	
	6.5	Agreements revised to include audit and termination rights	3	High		3	9	
	6.6	Exit and substitution strategies tested and documented	3	High		5	15	
	6.7	Location and concentration risks assessed and mitigated	3	High		4	12	
	6.8	Internal audit reviewed provider compliance with policy	3	High		3	9	

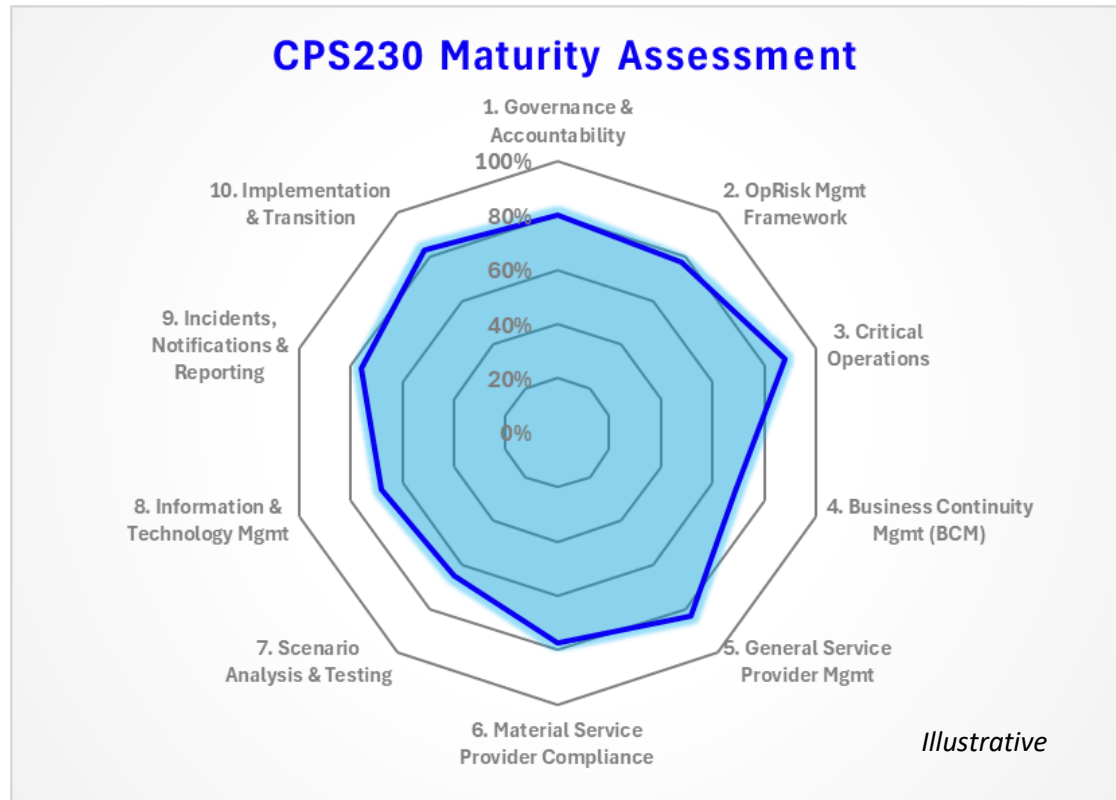
CPS230 – Compliance Maturity Assessment

Compliance Category	Compliance Obligation / Requirement		APRA Checklist Item Ref	Relative Weight	Score	Raw Score	Weighted Score	Category Compliance
7. Scenario Analysis and Testing	7.1	Severe operational risk scenarios developed and tested	10	High		4	12	65%
	7.2	Scenarios used to assess controls and resilience	10	High		3	9	
	7.3	Scenario test results reviewed and remediated	10	High		3	9	
	7.4	Scenarios aligned with critical operations and risks	10	High		3	9	
8. Information and Technology Mgmt	8.1	IT systems assessed and confirmed as fit for purpose	1	High		5	15	68%
	8.2	Information assets reviewed for age and obsolescence	1	High		3	9	
	8.3	CPS 234 compliance confirmed and security tested	9	High		2	6	
	8.4	Critical IT dependencies documented and validated	1	High		3	9	
	8.5	BCP tested for failure of critical tech components	9	High		4	12	
9. Incidents, Notifications and Reporting	9.1	Incident management process updated to meet new requirements	4	High		5	15	76%
	9.2	Material incidents reported to APRA within 72 hours	4	High		3	9	
	9.3	Tolerance breaches reported to APRA within 24 hours	4	High		4	12	
	9.4	Contract changes reported to APRA within 20 days	4	High		3	9	
	9.5	Offshore arrangements pre-notified to APRA	4	High		4	12	
10. Implementation and Transition	10.1	CPS 230 implementation roadmap developed and tracked	NA	High		5	15	83%
	10.2	Legacy contracts reviewed for alignment to CPS 230	3	High		3	9	
	10.3	Compliance gaps assessed and remediation initiated	NA	High		5	15	
	10.4	Organisational change management plan to embed requirements	NA	High		4	12	
	10.5	Progress tracked toward 2025/2026 CPS 230 milestones	NA	High		5	15	
	10.6	Staff and leadership trained on CPS 230 requirements	NA	High		3	9	

CPS230 – Compliance Maturity Assessment

The CPS230 assessment model produces summary outputs which can be used for implementation planning and briefing management on the key gaps.

Compliance Category	Maturity Rating
1. Governance & Accountability	80%
2. Operational Risk Management Framework	78%
3. Critical Operations	88%
4. Business Continuity Management (BCM)	69%
5. General Service Provider Management	83%
6. Material Service Provider Compliance	78%
7. Scenario Analysis & Testing	65%
8. Information & Technology Management	68%
9. Incidents, Notifications & Reporting	76%
10. Implementation & Transition	83%

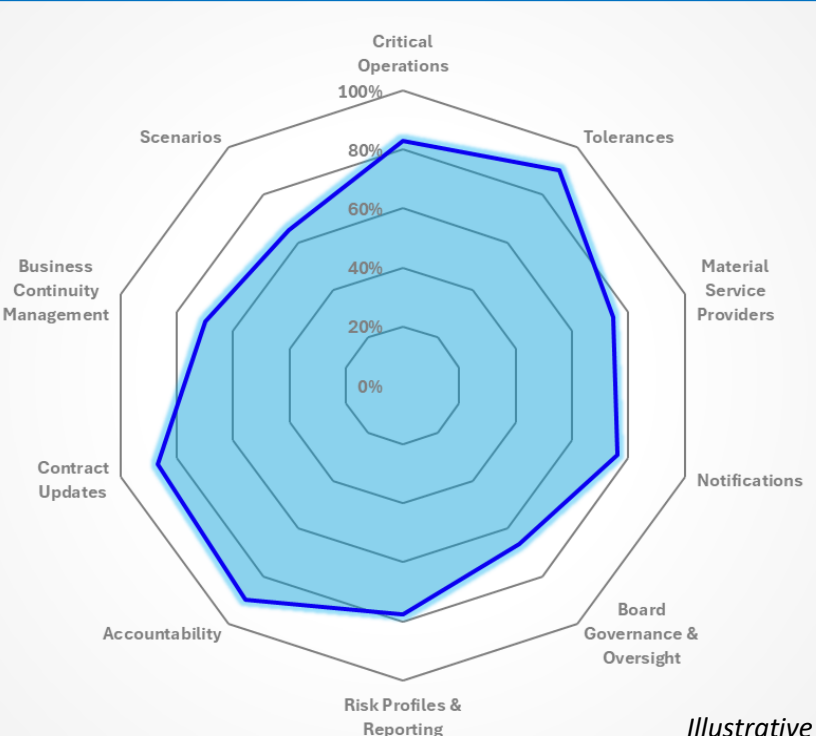


In this example, we can see that “Business Continuity Management”, “Scenario Analysis & Testing” and “Information & Technology Management” are three areas that need some improvement to be CPS230 compliant.

CPS230 – Compliance Maturity Assessment

*The maturity assessment model has also been mapped to APRA's CPS230 Compliance Checklist. **

APRA CPS230 Checklist Category

	Category Score	Overall Score	
1 Critical Operations (COs) are identified.	83%	78%	 <i>Illustrative</i>
2 Tolerances are defined and approved by the Board for COs (time, data loss, and service level).	90%		
3 Material Service Providers (MSPs) are identified.	75%		
4 Notifications are operational for material events, tolerance breaches and MSP changes.	76%		
5 Board Governance & Oversight is in place and clear roles and responsibilities are set.	67%		
6 Risk Profiles & Reporting is established and supporting oversight accountabilities.	78%		
7 Accountability for COs, MSPs, and monitoring is in place.	90%		
8 Contract Updates have an extension of 12 months per paragraph 7 of the standard.	87%		
9 Business Continuity Management (BCM) shifts to a Critical Operations focus	70%		
10 Scenarios align with BCM uplift and focus on severe yet plausible scenarios for Critical Operations and Material Service Providers.	65%		

* <https://www.apra.gov.au/response-to-submissions-cpg-230-operational-risk-management#attachment-b-cps-230-compliance-checklist>

Key reference documents for CPS230

Objectives and key requirements of CPS230:

<https://www.apra.gov.au/sites/default/files/2023-07/Prudential%20Standard%20CPS%20230%20Operational%20Risk%20Management%20-%20clean.pdf>

Prudential practice guide:

<https://www.apra.gov.au/sites/default/files/2024-06/Prudential%20Practice%20Guide%20CPG%20230%20Operational%20Risk%20Management.pdf>

Response to submissions - CPG 230 Operational Risk Management:

<https://www.apra.gov.au/response-to-submissions-cpg-230-operational-risk-management>

Our compliance experience

Organisation	Engagement description
 	Program management of the following programs: • StrongerSuper Reporting and Disclosure program • SuperStream eRollovers program • SuperStream eContributions program • Advisor Service Fees (ASFs) to address issues raised by the Royal Commission regarding obligations relating to ASFs • Plum Compliance program • ATO Roadmap/eCommerce Simplification program • Controls Transformation program • ASIC Product Disclosure project • Customer Response Initiative Delivery assurance reviews of the following programs: • StrongerSuper program • Claims Transformation program • SSBO and Regulatory Change Office
	Program management of Lendlease's Sustainability Reporting
 Lifestyle Solutions	Project management of Government Action Plan
	PMO management of Telstra's Structural Separation Undertaking

Our compliance experience

Organisation	Engagement description
	Program Management of Regulatory Compliance, 5 Minute Settlement and Dynamic Pricing programs
	Consultancy on FIRB (Foreign Investment Review Board) Remediation
	FOFA (Future Of Financial Advice) and Stronger Super Ready Program Quality assurance and testing for AMP's SuperStream projects
	Technical program management of CBA's SuperStream capabilities to support contributions and rollovers Program management and PMO of various programs including Financial Crime Data Assurance, Align Advice Closure Program and Regulatory Reform Program Quality Assurance of Retail Advice Products Upgrade
	Program Management and PMO of Supervisory and Monitoring Program
	Program management of 5 Minute Settlement and global Settlement Program
 	Program management of Apollo/Mercury - Audit Remediation

Our projects so far:

2007

Villawood Detention Centre
(Sydney)

2008

South Australian Detention Centre
(Sydney)

Seven Consulting has been giving back to the wider community since 2007, by supporting our team and their families in voluntary projects to assist those who find themselves in need of help.

2011

Cambodian School Build
(Sydney)



2012

Barnardos Kingston House
(Sydney)



2013

Youth off the Streets
(Sydney)



2015

- Jesuit Refugee House – Blaiket (Sydney)
- Hanover Crisis Centre (Melbourne)



2016

Marian Villa (Sydney)



2021 – Mini Project 7

In 2021, Seven Consulting continued to acknowledge the importance of fostering a community presence. Seven Consulting team members across three cities were able to participate in multiple mini projects throughout the year to fulfill our Project 7 commitment.



2020

– **DONATION DRIVE**
Project 7 gave back to the community, by donating \$104,000 across 29 charities, enabling these organisations to create real change in the lives of those who need it most.



2019

- Avalon Centre (Melbourne)
- Dignity.org.au (Sydney)
- Bahay San Jose – House with No Steps Foundation (Manila)



2018

- Erin's Place (Sydney)
- Concordia Childrens Services (Manila)
- M.A.D. Woman Foundation (Melbourne)



2017

- Launch Housing (Melbourne)
- Cerebral Palsy Foundation (MNL)



2022 – Mini Project 7

- M.A.D. Woman (Melbourne)
- *The pencil case challenge*
- Bahay ni Maria and Tahanan ng Pagmamahal (Manila)



2023 – Mini Project 7

Sydney & Melbourne

- Clean Up Australia
- HeartKids
- M.A.D. Woman
- Sydney
- Balmoral Burn
- Monika's Rescue
- Pocket City Farms
- Manila
- Solar Hope
- JCI Batangas Caballero



2024

Sydney

- Northern Beaches Women's Shelter
- Melbourne
- Community Housing Limited
- Manila
- Habitat for Humanity Philippines
- Tanging Yaman Foundation Inc.



2025

Sydney

- CatholicCare

Manila

- A Home for the Angels

Melbourne

- Lighthouse Foundation





SEVEN CONSULTING DELIVERY SUMMIT



The purpose of the Seven Consulting annual Delivery Summit is to share our clients' best practices in program and project delivery. It also serves as a celebration of success, a thank you, a training session, and a networking opportunity for our clients and their selected delivery leads.

Some of the Delivery Summit Speakers include:

John Hunt - CIO & Managing Director of Group Enablement, Woolworths Group; **Jeya Shan** - Director Strategic Projects, CLP Power Hong Kong Limited; **Mick O'Brien** - Managing Director, EQT; **Darren Abbruzzese** - CIO Business Banking and Group Digital, NAB; **Glenn Waterson** - GM Retail Transformation, AGL; **Victoria Jones** - Head of Lending Transformation, ANZ; **Jane Harford** - Former Director of IT, Melbourne Girls Grammar; **Cindy Vandecasteele** - Former General Manager Customer Engagement, Alinta Energy; **Cameron McLean** - Former Chief Technology & Data Officer, GMHBA; **Margaret Wilde** - Program Director, NAB; **Geraldine Chin Moody** - Non-Executive Director & Chair Advisory Board, Directors Australia; **Alice Kunek** - Australian Professional Basketball Player, Seven Consulting Opals; **Kristy Wallace** - Australian Professional Basketball Player, Seven Consulting Opals

We have achieved an average NPS of **68** across our **6** Delivery Summits

Our Delivery Summit Supporting Organisations



Visit us for more information: www.sevenconsulting.com/seven-consulting-delivery-summit



Following on from being the first dedicated sponsor of the Matildas, we continue to support world-class Australian women's teams with the Seven Consulting Opals, currently ranked No.2 in the world and Olympics world bronze medal winners.

We are extremely proud to be official sponsors of the Australian Women's National Basketball team, the Seven Consulting Opals.



Seven Consulting is a proud naming rights partner of the Australian Women's National Basketball team, the Seven Consulting Opals.





Australia's Best Program Delivery Company

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