



CLC's implementation of the ANAO performance audit recommendations *December 2025 update*

On 7 June 2023 the Australian National Audit Office (ANAO) published its performance [report](#) on *Governance of the Central Land Council* (CLC). This report found that the CLC's governance arrangements under the *Aboriginal Land Rights (NT) Act 1976*, the *Native Title Act 1993*, and the *Public Governance, Performance and Accountability Act 2013 (PGPA Act)* are largely effective and provided 11 recommendations to address gaps and strengthen systems. The CLC's initial response is included in the ANAO report.

This report provides a six-monthly update on implementation progress for each recommendation.

We are pleased to say that 9 of the 11 recommendations are now complete.

ANAO Recommendation 1:

The Central Land Council establish a governance document setting out:

- a) how the accountable authority (that is, the Chair and CEO) intends to operate, with specific reference to those decisions which require joint authority, and those which can be made independently by one or the other party: and
- b) the role of the accountable authority under the PGPA Act and the role of the Council under the ALRA.

Implementation Status - Complete

The CLC accountable authority are now operating with an endorsed governance document regarding accountability authority roles and responsibilities, how decisions can be made, and clarifies the distinct role of the Council and the Accountable Authority. Implementation of the governance document is supported by an annual work plan for accountable authority meetings and secretariat.

ANAO Recommendation 2:

The Central Land Council increase the accessibility of the Council and Executive Committee meeting rules and minutes (which could include the use of the Central Land Council website, newsletter, radio and social media platforms to promote how the rules and minutes can be accessed).

Implementation Status - Complete

The CLC have taken steps to increase constituent awareness of the accessibility of these documents, including promoting accessibility and a nominated contact on the CLC website, and in the Council News newsletter online and in communities. The CLC also informs constituents about meeting outcomes via the newsletter and on the regional Aboriginal radio channel, CAAMA radio.

ANAO Recommendation 3:

The Central Land Council develop a mechanism to improve full Council visibility of decisions made on its behalf by the Executive Committee.

Implementation Status - Complete

The CLC have implemented a mechanism that ensures all resolutions made by the Executive Committee are provided to the Council at each Council meeting, with opportunity for member discussion and clarification.



ANAO Recommendation 4:

The Central Land Council strengthen monitoring against Part IV agreements to detect and address any non-compliance with agreement conditions.

Implementation Status - In Progress

The CLC have taken actions to progress this significant project to strengthen the monitoring of Part IV agreements, including allocating additional resources, sourcing independent technical advice, and prioritising the exploration and mining permits and agreements system reform project. The CLC is making continuous improvements parallel to and as part of this development.

ANAO Recommendation 5:

The Central Land Council strengthen the procurement components of the Community Development Program by documenting specific procurement procedures.

Implementation Status - Complete

The CLC have developed a Community Development Implementation Guide which outlines the specific procurement procedures for CLC staff to comply with in their work facilitating meetings of Aboriginal governance groups who select partners to implement community development projects.

ANAO Recommendation 6:

The Central Land Council:

- a) review its Risk Management Plan in line with its commitment to conduct an annual review and in doing so remove references to obsolete frameworks or policies; and
- b) ensure the Risk Management Plan and the risk profile are endorsed by the accountable authority of the Central Land Council.

Implementation Status - Complete

The CLC Risk Management Framework has been reviewed, with the revised framework endorsed by the Accountable Authority, and the new Risk Management Policy approved by the CEO. The Risk Management Policy was again reviewed and approved by the Accountable Authority in June 2025. The CLC continues to strengthen its risk management procedures to support implementation.

ANAO Recommendation 7:

The Central Land Council conduct a review of its policy suite to ensure that important governance elements and functions have an associated policy, that key policies are endorsed and appropriately reviewed, and that content is complete and accurate.

Implementation Status - Complete

A review of the policy suite has been undertaken to ensure the existence, currency and approval of key policies. The findings of this review have been incorporated into the cyclical review process with a governance process being developed to ensure policies are maintained and improved over time.



ANAO Recommendation 8:

The Central Land Council:

- a) conduct fraud risk assessments regularly, in accordance with its Fraud Policy; and
- b) implement a fraud control plan to manage fraud risks identified during the assessments.

Implementation Status - Complete

In December 2023, the CLC conducted a comprehensive fraud risk assessment with the assistance of independent experts from PKF Integrity.

A key outcome of the assessment was the development of a fraud control plan to manage the identified risks. The recommended actions from the assessment have been accepted and are currently being implemented.

A second comprehensive Fraud Risk assessment has been undertaken as of November 2025 with the resulting Fraud Control Plan and measures to be reviewed in the new year.

ANAO Recommendation 9:

The Central Land Council:

- a) make the requirements for managing conflicts of interest in Council and Executive Committee meetings consistent across governance documents; and
- b) implement a fit for purpose conflict of interest declaration and management process that is aligned to the Code of Conduct for employees.

Implementation Status – (a) Complete

Implementation Status – (b) In progress

The Council updated the requirements for the management of elected member conflict of interest to ensure consistent processes.

The Employee Conflict of Interest Declaration and Management policy was updated in May 2023 to align with the Code of Conduct. A 2025 internal review of implementation found opportunity for improvement, and the policy was updated in July 2025. Progress towards implementation of this recommendation will be reviewed in the new year.

ANAO Recommendation 10:

The Central Land Council Accountable Authority ensure that Audit and Risk Committee members make an annual declaration of material personal interests.

Implementation Status - Complete

Annual declarations of material personal interests have been recorded for all members of the Audit and Risk Committee, and processes introduced to support ongoing timely completion.

ANAO Recommendation 11:

The accountable authority of the Central Land Council:

- a) amend the Audit and Risk Committee Charter to require the Audit and Risk Committee to provide a written statement to the accountable authority, at least annually, about the



appropriateness of the Central Land Council's financial and performance reporting; systems of risk oversight and management; and system of internal control; and

- b) annually assess the performance of the Audit and Risk Committee to confirm that it is effectively undertaking all mandatory functions.

Implementation Status - Complete

The Accountable Authority have amended the Audit and Risk Committee [Charter](#) requiring the Audit and Risk Committee to report at least annually with regards to the appropriateness of financial reporting and performance reporting systems, systems of risk oversight and management and systems of internal control. This requirement has been included in the Audit and Risk Committee annual work plan and the statement provided to the Accountable Authority in May 2024.

The annual assessment of performance of the Audit and Risk Committee was completed in June 2024 and 2025.