

Shire of East Pilbara

Operational Audit and Asset Management System Review ERA Licence 17: 2008-2011

Post Audit Implementation Plan

Summary of Issues and Recommendations and Post Audit Plans

Part A -Operational Audit

Licence Condition Reference	Issue	Recommendation	Post-Audit Implementation Plan	Person Responsible / Date of Implementation
Cl. 5 and Cl.21.1	<ul style="list-style-type: none"> The Annual Performance Report for the year ended 30 June 2010 was submitted late, as referred to in the ERA letter to the Shire dated 20 August 2010; This letter stated: "As the performance report was submitted after the due date, it will need to be recorded as a non-compliance with Schedule 5, clause 2.1 in next year's compliance report (for the year ending 30 June 2011)."; However, the unsigned copy of the Compliance Report for the year ended 30 June 2011, as presented for audit mistakenly refer to the late submission of the Water Performance Report for the year ended 30 June 2011 and not 30 June 2010. The late submission of the Annual Performance Report for the year ended 30 June 2010 was in fact incorrectly recorded in the 2010 Annual Compliance Report (as the late submission only occurred after 30 June 2010); The Annual Performance Report for the year ended 30 June 2011 was submitted late, as referred to in the ERA letter to the Shire dated 17 August 2011; This letter stated: "As the performance report was submitted after the due date, it will need to be recorded as a non- 	<ul style="list-style-type: none"> An appropriate record should be kept of all disclosure and reporting requirements stipulated in the operating licence provided by the ERA to the Shire. Responsibility for compliance with these requirements should be allocated to a specific person who should pro-actively pursue it; and In addition, a proper record of all instances of non-compliance with licence conditions should be kept and be appropriately included in the Annual Compliance Report forwarded to the ERA. 	<p>A document recording all ongoing reporting and disclosure requirements , dates and results will be prepared and an officer delegated to ensure all reporting and timing requirements are met</p> <p>The above officer will also prepare an ongoing record of non-compliance for inclusion in the Annual Compliance Report</p>	<p>MC Rowe/TSAO Accepted by September 30th 2012</p> <p>MC Rowe/TSAO Accepted by June 30th 2012</p>

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	<p>compliance with Schedule 5, clause 2.1 in the compliance report for the year ending 30 June 2012.”;</p> <ul style="list-style-type: none"> ▪ The Compliance Report for the year ended 30 June 2010 was submitted late as referred to in the ERA letter to the Shire dated 22 September 2010; ▪ This letter stated: “Failure to provide the compliance report to the Authority by the due date is a non-compliance with the licence and this item should be included in the compliance report for the year ending 30 June 2011.”; and ▪ However, the unsigned copy of the Compliance Report for the year ended 30 June 2011, as presented for audit did not include any reference to the late submission of the Compliance report for the year ending 30 June 2010. 			
Cl. 6 and Sch. 3	<ul style="list-style-type: none"> ▪ The Shire states, in paragraph 1.10 of its ‘End-user Service Charter for Newman Non-Potable Water Supply’ – May 2010’ (Service Charter), it provides a: “24 hour emergency contact services to receive advice of emergency situation.”; ▪ An emergency assistance telephone number is provided in the ‘Service Charter’; ▪ Mr. Ken Giblett, the Works Supervisor for the Shire is the emergency contact officer; and ▪ However, only the office reception number is provided as an after hours emergency services number on the Shire’s website. 	The emergency assistance telephone number should be prominently disclosed on the Shire’s website.	The emergency assistance telephone number will be shown on the Shire’s website	MC Rowe Accepted by 31 ST March 2012
Cl. 6 & Sch. 3: Cl. 3.1, 3.4, 3.8 and	<ul style="list-style-type: none"> ▪ The Shire states in paragraph 2.8 of its Service Charter: 	<ul style="list-style-type: none"> ▪ The Service Charter should be amended to indicate complaints must be resolved within 	15 days will be amended to 15 business days	MC Rowe to amend by 31 st

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3.10	<p>"...an officer of the Shire will personally respond within two business days of the complaint lodgement."; and</p> <p>"...complaints must be resolved within a period of 15 days."</p> <ul style="list-style-type: none"> The Shire further states in paragraph 2.8 of its Service Charter: "If not satisfied with the Shire's response, or if the matter has not been resolved within a period of 15 days the complainant may refer the matter to the Department of Water." 	a period of 15 business days, as stipulated in Schedule 3 to the Operating Licence, and not 15 days as currently stated.		July 2012
Cl. 6 & Sch. 3: Cl. 3.1 and 3.9	<ul style="list-style-type: none"> The Shire does not have a complaints register in place. However, a properly compiled 'Complaint Registration' form does exist. This form provides for the capture of an appropriate level of detail in respect of lodged complaints. But, the form is not pre-numbered. 	<ul style="list-style-type: none"> The 'Complaint Registration' forms should be sequentially numbered and filed to help provide an audit trail in respect of complaints received; and A database should be setup to record complaints. 	<p>Complaints registration forms will be sequentially numbered and</p> <p>Base to be set up by 30th September 2012</p>	MC Rowe /TSAO Accepted by 30 th September 2012
Cl. 6 & Sch. 3: Cl. 3.6 and 3.7	<ul style="list-style-type: none"> The Shire states in paragraph 2.8 of its Service Charter: "The shire has a written complaints procedure in place and an officer designated to record complaints and to coordinate a response."; No complaints procedure manual exists. However, supporting forms to the 'Complaint Registration' form exist. These forms deal with: <ul style="list-style-type: none"> Complaint Resolution; Closure; and Non-Closure of complaints. 	<ul style="list-style-type: none"> A specific person should be allocated the task to: <ul style="list-style-type: none"> Promptly cooperate with the Department of Water's request during the process of investigation and conciliation of complaints; Provide the Department of Water with stipulated information upon request; and A complaints procedure manual should be compiled and be implemented. 	Complaints Manual to be compiled and issued. Specific Person to be identified.	MC Rowe/TSAO Accepted by 31 st September 2012

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	<ul style="list-style-type: none"> ▪ As such, it guides the user to follow a structured process to resolving the complaint; and ▪ As stated above, no complaints procedure manual exist to emphasise the obligations to: <ul style="list-style-type: none"> ▪ Promptly co-operate with the Department of Water's request during the process of investigation and conciliation of complaints; and ▪ Provide the Department of Water with stipulated information upon request. 			
Cl. 8 & Sch. 3: Cl. 4.1 and 4.2	<ul style="list-style-type: none"> ▪ The Shire states in paragraph 2.2 of its Service Charter: "In addition, Council meeting agendas always include an item for discussion/comment on the wastewater services. The dates of Council meetings are advertised in local newspapers and are generally open to members of the public who may ask questions at set times during meetings."; ▪ An examination of Minutes of Council Meetings held during the 2011 calendar year disclosed only on one occasion was public question time used. As such, this appears to be an ineffective medium to use for customer consultation; ▪ No meetings with customers take place on a regular basis; ▪ No simple newsletter, providing basic information about the licensee's operations is published; ▪ On an annual basis, a 'Principal Activities Plan' (Plan) is compiled. This plan sets out the Shire's future activities and budgets. 	<ul style="list-style-type: none"> ▪ Due to the specific circumstances of the Shire, it may be beneficial to consult the ERA as to the type and extent of customer consultation to be undertaken. 	Consultation will be enacted by 30 th September 2012	MC Rowe and Director Technical Services 30 th September 2012

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	<p>This Plan is approved at a Council meeting which customers may attend. The meeting is advertised in the local newspaper;</p> <ul style="list-style-type: none"> ▪ At present the Shire has only four customers which utilises its non-potable water supply services; and ▪ The Shire did not consult the ERA in respect of the type and extent of customer consultation to be undertaken. 			
Sch. 3: Cl. 5	<ul style="list-style-type: none"> ▪ The Shire states in paragraph 1.6 of its Service Charter: "All non Shire end users will be required to sign a end user agreement setting out the terms and conditions embodied in this charter."; ▪ At present the Shire has only four customers which utilises its non-potable water supply services. These four customers are: <ul style="list-style-type: none"> ▪ Newman Turf Club Inc.; ▪ St John Ambulance Australia (WA); ▪ Newman Lion's Club; and ▪ Newman Senior High School. ▪ With the exception of the Newman Senior High School, 'Agreements to Supply Non Potable Water' was entered into with all other customers. 	<ul style="list-style-type: none"> ▪ The Shire enters into an 'Agreement to Supply Non Potable Water' with the Newman Senior High School at the earliest opportunity. 	Accepted by end May 2012	MC Rowe
Cl. 20 and Sch. 4	<ul style="list-style-type: none"> ▪ As per the 'Water Compliance Manual Datasheets' for the respective years: <ul style="list-style-type: none"> ▪ 100% of customer complaints were resolved within 15 business days during the 2010 – 2011 reporting year; ▪ 100% of customer complaints were resolved within 15 business days 	<ul style="list-style-type: none"> ▪ The Shire should rather disclose no complaints were received during the audit period (nil return) than converting the absence of complaints to a 100% success rate. 	Accepted by Next Annual reporting July 2012	MC Rowe 31 st July 2012

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	<p>during the 2009 – 2010 reporting period; and</p> <ul style="list-style-type: none"> ▪ 100% of customer complaints were resolved within 15 business days during the 2008 – 2009 reporting year. ▪ The Shire confirmed, in actual fact, no complaints were recorded during the audit period. ▪ 			
		<ul style="list-style-type: none"> ▪ 		
		<ul style="list-style-type: none"> ▪ 		

Summary of Issues and Recommendations and Post Audit Plans

Part B – Asset Management System Review

Key Process	Issue	Recommendations	Post Implementation Review	Person Responsible / Date of Implementation
Asset Management Brochure Note: This document is now referred to as the Asset Management Manual	Operation, maintenance, regulatory requirements etc of the WWTP and Effluent Reticulation/ Distribution System respectively be contained in two separate documents or as distinct sections of a single AMP document. That all material be appropriately titled and included in a logical sequence within the brochure and all areas appropriately cross referenced	Requires minor editing and rearrangement as discussed with Consultant Requires minor re-arrangement as discussed with Consultant	Editing and re-arrangement will be undertaken as discussed with reviewer	MC Rowe 31 st July 2012
	That a general arrangement plan of the plant which identifies major items of equipment should be included in the AMB . Similarly, an organisation diagram showing lines of responsibility and general duties should be provided	Plan provided but not organization diagram	Organization Diagram will be includes	MC Rowe 31 st July 2012
Environmental Analysis	<ul style="list-style-type: none"> Whilst identifying licence changes as possible impacts on the regulatory environment, only plant inflow variations are identified as factors impacting the physical environment of the plant. Other factors such as power or equipment failure, fire, etc are mentioned in the later risk analysis, but not at the operating environment analysis stage. 	<ul style="list-style-type: none"> The process to identify the physical factors associated with the operating environment of the plant should be broadened to coincide with the factors dealt with in the risk analysis / management and contingency plans. 	Environmental analysis documentation will be broadened to include a brief outline of the physical factors covered under Contingency Planning below	MC Rowe 31 st July 2012
	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 		
Asset Management Information System	<ul style="list-style-type: none"> It is noted that copies of various correspondence, reports, completed check lists and test results etc related to the treatment plant are held by various persons and at different locations. However, there is no single source where all this information is available. Reviewer's opinion is that electronic copies of all information should be placed on the 	<ul style="list-style-type: none"> That Council gives consideration to scanning all relevant information (held at various locations by different treatment plant related staff) and filing within the Synergy system to enable all relevant operations and other information to be accessed at a single source, and distributed to others and Authorities as appropriate. 	Accepted by 30 th November 2012	MC Rowe/TSAO/Sewage Operator

Key Process	Issue	Recommendations	Post Implementation Plan	Review Date of Implementation	Person Responsible /
	Synergy system software so that a complete picture of all available information is promptly available from a single central source.	This recommendation is not intended to remove hard copy information from those who currently produce or require it.			
Contingency Planning	<ul style="list-style-type: none"> There are no written procedures associated with the occurrence of most of the events listed in the Risk Register. For example: what action and/or reporting, should be followed by the operator in the event of a power or equipment failure, fire, cyclonic threat etc. What are the procedures for by-pass to the storage or the temporary disposal area? 	<ul style="list-style-type: none"> The contingency plans for each identified risk should be detailed as requested in the 2008 review. 	To be completed as originally recommended in the 2008 review. for risks including Process failure, Toxic materials in influent, Blockage in plant, Mechanical failure, Electrical failure, Structural failure, Chlorine leak, Adverse weather including lightning strike, flooding, bushfire		MC Rowe /Sewage Operator 30 th September 2012
Review of Asset Management System	<ul style="list-style-type: none"> It is accepted that the assets are well managed and that few (if any) changes occur between independent reviews – prior to which the asset management plan is often revised and re-issued; and However this practice, while probably adequate, does not comply with the Licence requirement for regular reviews to be undertaken. An appropriate review by an individual familiar with the overall operations of the plant should not require more than an hour or so to conduct. 	<ul style="list-style-type: none"> It is recommended that Council's consultant undertake an appropriate review annually and sign off with a note to file verifying that the system is up to date and noting any amendments made. 	The review will be conducted annually starting 30 th June 2012 and will include a review of contingency plans The review will be signed off by the reviewer and any changes to contingency plans or any other included amendments noted		MC Rowe 30 th June 2012

Notes: MC Rowe Wastewater Consultant

TSAO Technical Services Admin Assistant: M/S Racquel Langoulant

Sewage Operator: Mr Robert Weir

SIGNATURE OF AUTHOR

This plan has been prepared by the undersigned in response to Shire East Pilbara ERA Water Licence : 17 Audit Report Dated 4th May 2012
Operational Audit and Asset Management Review prepared by Paxon Group on behalf of ERA :

Signed:----- MC Rowe
Environmental Consultant Shire East Pilbara

Date:20th May 2012