

Post-Audit Implementation Plan – Operational Audit 2016

Operations Manager (OM) Corporate Services Manager (CSM) Customer Services Officer (CSO) Operational Support Services (OSS)

Audit Ref 2017	Licence Condition Reference	Issue	Recommendation	Action Plan	Person Responsible/ Implementation Date
A1	<i>Water Services Act 2012, Section 12, Licence Clause 3.1.1</i>	<ul style="list-style-type: none"> • Licensee has not complied with all applicable legislation. • We have identified a number of non-compliances with applicable legislation as follows: • Section 27 – Requirements for Licences (Obligation 11) • Section 29 – Duties of the Licensee (Obligation 12) 	Refer to the relevant recommendations included in this table.	Develop action plan to address the points raised and recommendations	All by Nov 2017
A2	Water Services Act 2012, Section 27, Licence Clause 3.1.1	Licensee has not complied with all of the obligations of the Water Services Code of Conduct (Customer Service Standards) 2013	We recommend that the licensee address the recommendations A7/2017 to A24/2017.	Develop action plan to address the points raised and recommendations	All by Nov 2017
A3	Water Services Act 2012, Section 29, Licence Clause 3.1.1	The licensee has not complied with all the duties imposed on it by the Act as it was unable to meet all Code requirements.	Refer to A1/2017	Develop action plan to address the points raised and recommendations	All by Nov 2017
A4	Water Services Act 2012, Section 129(5) & Section 173(4), Section 174(3)	Section 3.3 of the Customer Service Charter, January 2014 for its members informs customers that “We will provide written notice at least 14 days in advance when it is necessary to enter onto private land for planned major construction works. However, because of the nature of irrigation operations, and the frequent need to enter onto our customer’s properties, we are not always able to advise of entry onto your land for routine operations and maintenance. We will endeavour to contact you in person prior to entry. Should you not	We recommend that the licensee reviews and updates this Charter document to inform the RWS customers of this information.	Review the Customer Service Charter’s members and RWS	OSS/CSO Oct 2017

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		<p>be present, we will leave a calling card or send an SMS message to advise of our visit".</p> <p>We note that this clause is not included in the separate customer charter for RWS customers who are smallholders supplied with water for stock and garden purposes.</p>			
A5	Water Services Act 2012, Section 174(3)	<p>Although the Rules of the two Cooperatives provide detailed information related to the obligations and responsibilities of the shareholder members, there is very little specific information related to the obligations of the licensee and members in specific relationship to the management of the assets and the associated operation and maintenance activities.</p>	<p>Although there are obviously mutual benefits to both the licensee and customers through the success of a cooperative, we recommend that the licensee considers an update to the Rules of the two cooperatives to set out the obligations and responsibilities related to the licensee being able to access the assets located on its customers' properties.</p>	<p>Review the rules as applicable</p> <p>Review procedural manuals</p> <p>Review Customer Service Charters</p>	CSM/OM/CSO/OSS by Oct 2017
A6	Water Services Act 2012, Section 176(1), Section 176(3), Section 181 & Section 186	<p>The licensee's Workplace Health and Safety handbook provides some information on staff responsibilities but there is no specific policy related to staff conduct.</p> <p>The licensee has a Code of Conduct Policy include in its Policy manual but this is aimed more for conduct of directors and executive staff rather than being for field or administrative staff communicating and dealing with the public and/or the licensee's customers.</p>	<p>Based on our observations and our comments for the obligations related to providing notice and entry to customer property, we recommend that the licensee develops policies for Powers of Entry and Staff Conduct. We would also recommend that these policies include references to the requirements for certificate of authority (obligation 55) to applying and executing warrants (obligation 58).</p>	<p>Review WHS documentation</p> <p>Review operational manuals</p>	OM/OSS by June 2017
A7	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 7	<p>Although the website informs customers that they can contact Harvey Water to request a 'Conditions of Connection' information pack, the information available on the licensee's website does not include the Conditions of Connection, Piping Policies or RWS Connection Agreement documents which include information related to the prescribed matters under this</p>	<p>We recommend that the licensee adds the Conditions of Connection, Piping Policies or RWS Connection Agreement documents to its website in order to meet the requirements of the obligation.</p>	<p>Review website content and website management</p>	OM/CSM/CSO by Dec 2017

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		clause. As a result, the licensee is not fully compliant with the requirements of this clause.			
A8	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 12(1)	<p>The RWS invoices do not include:</p> <ul style="list-style-type: none"> ▪ the licensee's website address ▪ contact details for account, payment and general enquiries for use by customers with hearing or speech impairment ▪ a statement that the website contains information about estimates, meter reading and testing, complaints and review. <p>We consider this to be a minor non-compliance in relation to the obligations for the licensee's non-member customers.</p>	We recommend that the licensee reviews its invoice template for non-member customers and revises the information provided to include these omissions.	Review the invoice template in line with the requirements of our business and customers	CSO by August 2017
A9	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 12(2)	<p>The RWS invoices do not include:</p> <ul style="list-style-type: none"> ▪ whether the bill was based on — <ul style="list-style-type: none"> – a meter reading; or – an estimate of the quantity of water supplied or the quantity of wastewater discharged ▪ the number of days to which the bill applies <p>We consider this to be a minor non-compliance in relation to the obligations for the licensee's non-member customers.</p>	We recommend that the licensee reviews its invoice template for non-member customers and revises the information provided to include these omissions.	Review the invoice template in line with the requirements of our business and customers	CSO by August 2017
A10	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 12(3)	<p>We observed that the invoices do not include:</p> <ul style="list-style-type: none"> ▪ that the customer may request a meter reading and bill to determine outstanding charges for a period that is not the same as the usual billing cycle ▪ that the customer may request a 	We recommend that the licensee reviews its invoice template for non-member customers and revises the information provided to include these omissions.	Review the invoice template in line with the requirements of our business and customers Review website information	CSO/CSM/OM by August 2017

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		<p>meter reading and revised bill if the customer disputes an estimate on which a bill is based and that if the customer so requests, information about the fees that apply</p> <ul style="list-style-type: none"> ▪ that the customer may request, in accordance with the regulations mentioned in section 79(3)(b), the testing of a meter and that if the customer so requests, information ▪ about the fees that apply and when the fees may be reimbursed in accordance with the regulations mentioned in section 79(3)(c) ▪ that the bill can be reviewed in accordance with the licensee's review procedure mentioned in clause 18 ▪ that complaints about the provision of a water service by the licensee or a failure by the licensee to provide a water service can be made in accordance with the licensee's complaints procedure mentioned in clause 35. ▪ We consider this to be a minor non-compliance in relation to the obligations for the licensee's non-member customers. 			
A11	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 15	<p>No information on the licensee's Leaking or Failure of Assets policy is included in the Harvey Water Piping Policies, Conditions of Connection, Connections Agreement or Customers Services Charter.</p> <p>As the only information is in the internal Policy Manual and is not publically available, we consider that this is a minor non- compliance.</p>	<p>We recommend that the licensee looks to include the details of the policy in one of its publically available documents.</p>	<p>Review website information</p>	<p>OM/OSS Oct 2017</p>

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A12	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 16(2)	No information related to the process for undercharging in bills is included in the Harvey Water Piping Policies, Conditions of Connection, Connections Agreement or Customers Services Charter.	We recommend that the licensee reviews the information that is currently made available to its non-member customers and looks to provide more information on the processes related to estimation of consumption, and undercharging and overcharging of bills.	Review website information	CSO/CSM/OM by August 2017
A13	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 18(2), Clause 18(3) and (6), Clause 18(4)	No information is made publically available relating to a written procedure for the review of a bill on the customer's request. As such, we consider that this is a minor non-compliance with the obligation.	For the non-member customers that the Code applies to, we recommend that the licensee provides step-by-step information to how the licensee investigates any faults with the infrastructure that is used as the basis for billing these customers and how the invoices will be processed during the investigation and rectification.	Review website information	CSO/CSM/OM by August 2017
A14	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 18(4) and Clause 35(4)	We note that although both the Harvey Water and RWS Customer Charters includes a section on Customer Contact that outlines the processes for dealing with complaints, the licensee has referenced and included the contact details for referring complaints to the Department of Water. This information is now out of date.	We recommend that the reference and the contact details included in the two Customer Service Charters should be updated to provide the details of the Energy and Water Ombudsman.	Review Customer Service Charters	CSO/OM/CSM by Oct 2017
A15	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 21(1) and Clause 22	Under the Water Services Act 2012 definition, a customer is 'a person to whom water services are provided by the licensee or who is entitled to the provision of water services by the licensee, other than a person who is a member of the licensee'. Therefore, the licensee does not	We are required under the audit guidelines to recommend that the licensee address the observed non-compliance and provide direct debit and Centrepay options for payment from non-member customers. We note, however, that it may be impractical for the licensee to do	No action will be taken – apply for an exemption if the Code is applicable to our business	CSM Nov 2017

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		<p>have to make these payment methods available to its member customers but does to its non-member customers.</p> <p>As a result the licensee is not in compliance with all of the payment method requirements included in the Code, with regard to its non- member customers.</p>	<p>so given the type of business operated by the licensee and the order of magnitude of the invoices that customers pay.</p> <p>The licensee has a relatively small customer base and the fees associated with the implementation of a direct debit payments may not make this a financially viable option for the licensee.</p> <p>Centrepay is unlikely to be an appropriate payment method for an irrigation business.</p>		
A16	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 24	<p>Any requests for changes have to be provided in writing to allow the changes to be made in the licensee's billing system.</p> <p>However, no confirmation from the third party receiving the redirected invoices is required to be submitted.</p>	<p>We recommend that the licensee reviews its current processes to ascertain whether requiring third party confirmation for redirection of bills would be appropriate.</p>	<p>No action will be taken – apply for an exemption if the Code is applicable to our business</p>	CSM Nov 2017
A17	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 27(2)	<p>Section 3 in the 'What We Ask In Return' section in both the Harvey Water Customer Service Charter and the RWS Customer Service Charter informs customers 'Let us know before the due date if you are having any difficulty in paying any amounts charged so that we may work with you to set up an agreed payment plan'.</p> <p>However, we note that this policy is not set out in the Trading Terms - Debtors Policy.</p>	<p>We recommend that the licensee adds additional text to the Trading Terms - Debtors Policy to specify that a payment arrangement does not incur interest or additional fees if the customer makes their payment in full and on time.</p> <p>Payment plans are not advertised on the non-member invoices and we recommend that this information is added.</p> <p>We would also recommend that additional text is added to the Customer Billing section on the Customer Service Charters to inform customers of these</p>	<p>Review Debtors Policy and Customer Service Charters if appropriate</p>	CSM by July 2017

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			matters.		
A18	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 28(1)	<p>Although the Trading Terms - Debtors Policy defines the course of debt management actions, it does not include any actions to inform the land owner of any payment arrangements entered into by the tenant or of any late payments incurred by a customer who is not the owner of the land.</p> <p>However, the licensee does not inform the owners of the land regarding matters relating to tenant customers experiencing payment difficulties or financial hardship. This is because the licensee consider that the onus is on the land owner to inform the licensee if the property has been leased.</p>	It is a requirement under the Water Code for licensees to ensure a land owner is aware of a proposed payment plan before the plan is entered into, we recommend that the licensee develops a process and includes information related to this obligation for informing the owners of the land for RWS tenant customers in the Trading Terms – Debtors Policy.	No action will be taken – apply for an exemption if the Code is applicable to our business	CSM Nov 2017
A19	Water Services Code of Conduct (Customer Service Standards) 2013, Clauses 28(4) and (5)	<p>Information regarding the payment plans, arrangements and other assistance that is available to customers is provided in the Customer Charters.</p> <p>However, we note that this information is not included on the back of the customer invoices sent out to customers.</p>	We recommend that the licensee informs customers regarding the payment plans, arrangements and other assistance that may be available to them on the back of the invoices.	No action will be taken – apply for an exemption if the Code is applicable to our business. There is limited space on invoices to provide information without significantly increasing our costs of producing invoices. We consider this recommendation inappropriate for our business	CSM Nov 2017
A20	Water Services Code of Conduct (Customer Service Standards) 2013, Clauses 35(1)	<p>The licensee has a specific Procedures for Customer Complainants Process and Reporting document that sets out the processes and procedures for recording and resolving complaints, provides information on the designated complaint handling officers and also sets out the complaint register reporting processes.</p> <p>Although complaints may be made in writing, by telephone, in person at the licensee's office by email, we note that the licensee's procedure document</p>	We recommend that the licensee revises the procedure to include references to complaints received through other medium.	Complaints are accepted in writing by letter or by e-mail which is appropriate for our business. We will review the procedure and advise.	CSO/OM by July 2017

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		only references written complaints.			
A21	Water Services Code of Conduct (Customer Service Standards) 2013, Clauses 35(4)	<p>We note that the information provided to the non-member RWS customers in the RWS Customer Service Charter does not provide these customers with details of procedures under the Act, and set out the costs and benefits to the customer if the use the complaint resolution procedure or instead of the procedures under the Act.</p> <p>We consider that these omissions represent a non-compliance with the obligation for its non-member customers.</p>	<p>We recommend that the licensee reviews its Customer Service Charters and revises at least the RWS Customer Service Charter to be in accordance with the requirements under this obligation.</p>	<p>Review the Customer Charter and amend as required</p>	<p>CSO by Oct 2017</p>
A22	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 35(6)	<p>Clause 35(6) requires the licensee's complaints procedure to publically available and the information made available by the licensee does not meet the requirements of the obligation. This is a minor non-compliance.</p>	<p>We recommend that the licensee makes its complaints procedure publically available.</p>	<p>Review the website information</p>	<p>CSO by Oct 2017</p>
A23	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 36(1)	<p>The licensee does not advertise the specified services as being available to customers. The licensee considers that if they were asked to provide them by a customer, they would ensure that the request was completed and at no charge to the customer.</p>	<p>We recommend that the licensee looks to advertise these specific services in the next update of RWS Customer Service Charter and information that it provides to its By Law customers. This information could also be provided on the back of customer invoices.</p>	<p>The services in 36 (1) are not required by our customers. If a request was received we would endeavour to comply however to advertise this is not a requirement. No further action to be confirmed.</p>	<p>CSM Nov 2017</p>
A24	Water Services Code of Conduct (Customer Service Standards) 2013, Clause 37(1)(b), Clause 37(1)(d), Clause 37(1)(g), Clause 31(1)(h) and Clause 37(2)	<p>Bill payment methods, the services provided under clause 36 of the Code, the information related to the licensee cutting off the water supply or reducing the rate of supply and the information related to estimated bills, customer requests for meter reads, meter testing and the review and complaints procedure requirements under clause 37(2) are not included on the licensee's</p>	<p>We recommend that the licensee makes the information required under these clauses available on its website in order to comply with the obligations.</p>	<p>Review the website information</p>	<p>CSO by Oct 2017</p>

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		website in accordance with the definition of 'publically available'			
A25	Water Services Act 2012, Section 12, Operating Licence Clause 3.8.2 and Clause 3.8.3	Although the licensee has developed a Reporting and Communication Requirements matrix which sets out its reporting obligations throughout the year and, in some cases, Outlook reminders have been set up to automatically email reminders to the staff responsible for the reporting/communication actions, the 2014/15 and 2015/16 compliance reports were submitted to the ERA after the due date and the date that the 2013/14 performance report was submitted could not be confirmed.	We recommend that the licensee reviews the Outlook reminders it has set-up and implements automatic reminders for the remaining obligations to ensure that all reporting deadlines are met in the future and that copies of the submitted information are maintained on record.	Completed – Outlook reminders and excel table	CSM April 2017