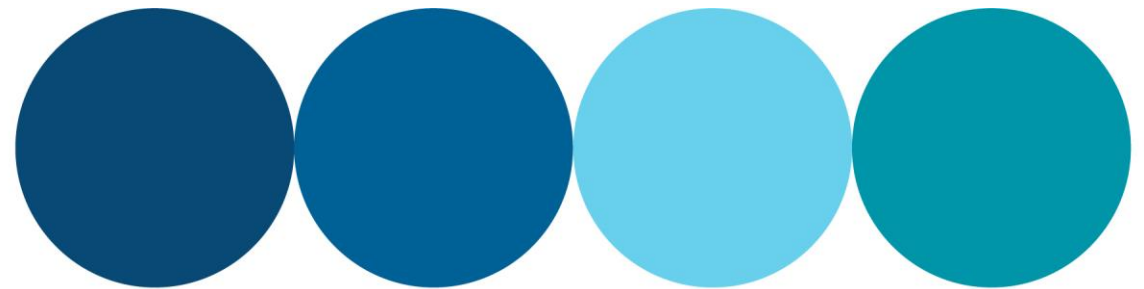


Water Corporation Post Audit Implementation Plan

January 2019





Finding Reference: 1/2018		Rating: B2
Observations	Recommendations	Management Comment
<p>Legislative Obligation (31):</p> <p><i>If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of memorial with the Registrar along with the prescribed fee (if any) if the charge or contribution has been paid.</i></p> <p>Observation:</p> <p>Memorials were not lifted when outstanding charges had been paid to avoid multiple memorials needing to be lodged and withdrawn.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Upon payment of a charge or contribution (and any prescribed fee thereof), the memorial relating to such payment should be lifted as soon as practicable. 2. A copy of the monthly review of deferred headworks / infrastructure contributions and property accounts with memorials that were fully paid is kept on file and signed off by the reviewer. 3. A back-up person be trained and assigned the responsibility of performing this review when the responsible officer is away. 	<p>Where arrears of charges are involved, action is not initiated to withdraw the memorial until all arrears of charges are paid. Where infrastructure contributions are deferred, action is initiated to withdraw the memorial at settlement or once the contributions and any related charges have been paid.</p> <p>Internal processes were reviewed in 2014/15 and monthly reporting introduced to initiate withdrawal of memorials where a request had not been received to initiate withdrawal. A request was also made to the Department of Water (now Department of Water and Environmental Regulation) to amend section 128 of the Water Services Act 2012 to address the issue. We expect the issue to be addressed in the upcoming review of the <i>Water Services Act 2012</i>.</p> <p>The Corporation agrees with recommendation 2. For recommendation 3 there are currently three people trained to do this work.</p>



Finding Reference: 1/2018		Rating: B2
Observations	Recommendations	
		Agreed Action
		Corporation will update its Work Instruction.
		Responsible Officer
		Head of Contact Centre
		Date of Implementation
		28 February 2019



Finding Reference: 2/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (32):</p> <p><i>If a routine inspection or maintenance is likely to cause disruption to the occupants of a place at least 48 hours' notice of a proposed entry must be given to the occupier of the place unless the occupier agrees otherwise.</i></p> <p>Legislative Obligations (49):</p> <p><i>In relation to entry to a place for the purposes of doing works, in the circumstances specified the licensee is required to give 48 hours' notice of proposed entry to a place to the occupier or owner, as applicable, unless the occupier or owner agrees otherwise.</i></p> <p>Legislative Obligations (50):</p> <p><i>Notice of a proposed entry by the licensee must be in writing and must set out the purpose of the entry, including (if applicable) any work proposed to be carried out.</i></p> <p>Observation:</p> <p>We observed:</p> <ul style="list-style-type: none"> For 5 out of the 15 samples (33%), a written notice was provided to the owner / occupier after the Corporation had visited the property. A breach was identified by the Corporation in the 2016–17 Financial Year, where works had been undertaken by the Corporation without the correct approval process being followed or notice of entry being issued. The terms '<i>likely to cause disruption to the occupants of the place</i>' and '<i>likely to adversely affect the place</i>' have not been defined in the Guide to entry powers for authorised persons under the Water Services Act 2012, procedural documents or training materials currently used by the Corporation. 	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> Provide further training to the relevant staff on the requirement to provide 48 hours' written notice; and In consultation with the relevant stakeholders, define the terms 'likely to cause disruption to the occupants of the place' and 'likely to adversely affect the place'. Following this process, all relevant procedures, work instructions, training materials, etc. should be updated to reflect the defined terms and be approved in line with established Water Corporation processes. 	<p>Management Comment</p> <p>The Corporation will implement the actions as per below:</p> <p>Agreed Action</p> <ol style="list-style-type: none"> We will provide follow-up training to relevant staff involved with the provision of 48 hours written notice. We will review and amend relevant documentation to ensure greater clarity around the terms "cause disruption to the occupants" and "adversely affect the place". <p>Responsible Officer</p> <p>Head of Operations Performance</p> <p>Date of Implementation</p> <p>30 June 2019</p>



Finding Reference: 3/2018		Rating: C2
Observations	Recommendations	Management Comment
<p>Legislative Obligations (35):</p> <p><i>The licensee must comply with sections 143 and 144 of the Act in relation to the proposed major works, and has given any notice required under section 148.</i></p> <p>Legislative Obligations (36):</p> <p><i>Before the licensee submits a proposal for the provision of major works to the Minister, the licensee must prepare, publish and make available plans and details of those major works as specified.</i></p> <p>Legislative Obligations (37):</p> <p><i>The licensee must, within 5 days of publishing the plans and details on the licensee’s website, give notice setting out the matters prescribed in section 143(4) to the persons and agencies specified.</i></p> <p>Observations:</p> <p>We observed:</p> <p>Obligations No. 35 and 36</p> <ul style="list-style-type: none"> For four (4) out of the five (5) samples selected (80%), evidence of the published plans and details on the Corporation’s website was not retained on file; and <p>Obligations No. 35 and 37</p> <ul style="list-style-type: none"> For four (4) out of the five (5) samples selected (80%), the notices issued to the owners and occupiers of the land and the Local Government did not state the “times when, and the places at which, the plans and details may be inspected” as detailed in Section 143 (4); and The term ‘likely to be adversely affected’ (refer to Section 143 (3)) has 	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> Document, approve and implement a process to save and retain screenshots on file, of the plans and details published on the Corporation’s website. These screenshots should include the date and details the plans were published on the Corporation’s website. As part of this process, Project Managers should be provided training on the updated requirements; Update the template letters used to provide notice to the owners and occupiers of the land and Local Government to include the “<i>times when, and the places at which, the plans and details may be inspected</i>”. As part of this process, Project Managers should be provided training on the updated requirements to ensure all future notices issued by the Corporation are in line with Section 143 (3); In consultation with the relevant stakeholders, define and document the term ‘likely to be adversely affected’ to provide further guidance 	<p>The observations have been accepted as per the objective evidence provided during the time of the audit.</p> <p>Historically, we have included an address and times at which the Plan can be viewed on the Notice of Proposal. This is no longer considered necessary as we now publish the Notice of Proposal plan online.</p> <p>Work has already commenced on defining “<i>likely to be adversely affected</i>” as this will improve consistency of approach amongst Project Managers.</p> <p>Agreed Action</p> <ol style="list-style-type: none"> Review & update the Major Works Checklist (AquaDOC #9843283) to include a requirement to document evidence that the plans have been published on the Corporation’s website, including the date of publication. Review and update the template letters and template Notice of Proposal plans to include the requirement for an online address



Finding Reference: 3/2018		Rating: C2
Observations	Recommendations	
not been documented within the relevant procedures or work instructions. Discussions with the process owners noted that the Corporation relies on the individual Project Manager's professional judgement and experience when reaching a conclusion on whether the owner and the occupier is "likely to be adversely affected"	<p>to Project Managers when exercising this obligation; and</p> <p>4. Provide training to all relevant staff on the updated requirements.</p>	<p>where the Notice of Proposal can be viewed.</p> <p>3. Clarify, define and document the term "<i>likely to be adversely affected</i>".</p> <p>4. Communicate all changes to relevant staff and reinforce the need to follow the documented process.</p>
		Responsible Officer
		Head of Project Management
		Date of Implementation
		30 June 2019



Finding Reference 4/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (42):</p> <p><i>A licensee proposing to provide water service works that are general works must prepare plans and details of the proposed works and publish and make them available for inspection.</i></p> <p>Legislative Obligations (43):</p> <p><i>The licensee must give a notice of general works setting out the matters referred to in section 151(3) to the persons and agencies specified</i></p> <p>Observations:</p> <p>Obligation No. 42:</p> <p>For four (4) out of the five (5) samples selected, the plans and details of the proposed general works were not published; and</p> <p>For one (1) out of the five (5) samples selected, the plans and details of the proposed works were published on the Corporation’s website however, evidence of this was not retained on file.</p> <p>Obligation No. 43:</p> <p>For four (4) out of the five (5) samples selected, the notices issued to the owners and occupiers of the land and the Local Government did not state the “times when, and the places at which, the plans and details may be inspected” as detailed in Section 151 (3).</p> <p>The term ‘likely to be adversely affected’ (refer to Section 151 (2)) has not been documented within the relevant procedures or work instructions. Discussions with the process owners noted that the Corporation relies on the individual Project Manager’s professional judgement and exercise when reaching this conclusion.</p> <p>An adjacent landowner to project was not provided with a Notice of</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. In consultation with the relevant stakeholders, adopt a mechanism to publish the plans and details of the proposed general works. This may be done through the Corporation’s website (similar to Major works) or via an alternative mechanism; 2. Update the template letters used to provide notice to the owners and occupiers of the land, Local Government and the Western Australia Planning Commission, to include the “times when, and the places at which, the plans and details may be inspected”, in line with the requirements of Section 151 (3); 3. In consultation with the relevant stakeholders, define and document the term ‘likely to be adversely affected’ to provide further guidance to Project Managers when exercising this obligation; 4. Following this process, update all relevant procedures, work instructions, training material, etc. to reflect the adopted mechanism 	<p>Management Comment</p> <ul style="list-style-type: none"> ▪ The observations have been accepted as per the objective evidence provided during the time of the audit. ▪ Historically, we have included an address and times at which the Plan can be viewed on the Notice of Proposal. This is not considered necessary when the Notice of Proposal Plan is published online. ▪ Work has already commenced on defining “likely to be adversely affected” as this will improve consistency of approach amongst Project Managers. <p>Agreed Action</p> <ol style="list-style-type: none"> 1. Review & update the General works checklist (AquaDOC#9843285) to include a requirement to document evidence that the plans have been published on the Corporation’s website, including the date of publication. 2. Review and update the template letters and template Notice of



Finding Reference 4/2018		Rating: B2
Observations	Recommendations	
<p>Proposal as part of the Prerequisites to Works procedure.</p> <p>For three (3) out of the five (5) samples selected, the <i>General Works Authorisation</i> was not signed by the relevant Regional Manager. Additionally, for one (1) out of the five (5) samples selected, the <i>Flow chart of Water Corporation General Works Procedure</i> was not signed by the Project Manager.</p>	<p>including, the requirement to retain evidence of publication on file for audit purposes; and</p> <p>5. Provide training to all relevant staff on the updated requirements</p>	<p>Proposal plans to include the requirement for an online address where the Notice of Proposal can be viewed.</p>
		<p>3. Clarify, define and document the term “likely to be adversely affected”.</p>
		<p>4. Communicate all changes to relevant staff and reinforce the need to follow the documented process</p>
		<p>Responsible Officer</p>
		<p>Head of Project Management</p>
		<p>Date of Implementation</p>
		<p>30 June 2019</p>



Finding Reference: 5/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (53):</p> <p><i>If the licensee enters a dwelling that is unoccupied, the licensee must leave a notice or a copy of the warrant (as applicable) in a prominent position in the dwelling before leaving the dwelling.</i></p> <p>Observations:</p> <p>The <i>Notice of Entry Form</i> does not detail the employee's full name and official title as required by the Act. A traceable crew number is provided instead. The Corporation has not provided sufficient evidence to support the proposition that there is an elevated risk to its staffs or contractors beyond standard operational risks faced in the normal course of business if staff were to disclose their full name on the <i>Notice of Entry Form</i>.</p>	<p>We recommend that the Corporation amend the existing practice and require staff disclose their full names on the Notice of Entry Form in accordance with the requirements of the obligation.</p>	<p>Management Comment</p> <p>For the personal safety of our Field Workers, full names will not be given to the public after entry to an unoccupied dwelling– a Crew number and job number will be left. This allows for the Corporation to identify the employee involved if there are any issues.</p> <p>Agreed Action</p> <p>No Further Action</p> <p>Responsible Officer</p> <p></p> <p>Date of Implementation</p> <p></p>



Finding Reference: 6/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (67):</p> <p><i>If the owner or occupier requests the licensee to test a meter, subject to the payment of the charge (if any) for testing that type of meter, the licensee must test the meter in accordance with the approved procedure.</i></p> <p>Legislative Obligations (68):</p> <p><i>If a meter test finds that the meter is outside the prescribed tolerance applicable, the licensee must take the specified actions, bear the costs of testing and refund or credit any charges paid under regulation 26(3).</i></p> <p>Observations:</p> <p>Obligation No. 67 – Regulation 26(3)</p> <p>The procedure documents and work instructions have not been approved by the CEO as required by the regulations.</p> <p>Obligation No. 68 – Regulation 26(5)</p> <p>For one (1) out of the seven (7) samples selected for testing, the meter was lost in transit and therefore, treated as a faulty meter however, the reading and charges were yet to be adjusted by the Corporation.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Update <i>S072 Financial and Legal Authorisation</i> to explicitly delegate the responsibility of approving meter test procedures and associated documents to an appropriate officer; 2. Following the approval of <i>S072 Financial and Legal Authorisation</i> the following documents should be reviewed and approved in line with delegations of authority: <ul style="list-style-type: none"> – <i>Asset Monitoring & Systems Investigations AMSI-P-120 Meter Testing and Reporting</i>; – <i>Customer Dispute Meter Test</i> (Work Instruction No: AMSI-W-128); and – Work Instructions. 3. Adjust the meter reading and charges relevant to the identified sample; and 4. Implement a process within Grange (i.e. bill intercept / calendar tool) to follow up customers in the instances the Corporation has to wait for advice from the customer. 	<p>Management Comment</p> <p>Agreed</p> <p>Agreed Action</p> <ol style="list-style-type: none"> 1. <i>S072 Financial and Legal Authorisation</i> to be updated 2. <i>Associated documentation</i> to be updated 3. No further action required, adjustment completed 4. Work instruction to be updated <p>Responsible Officer</p> <ol style="list-style-type: none"> 1. Head of Risk & Assurance 2. Head of Engineering 3. N/A - Completed 4. Head of Customer Billing & Assurance <p>Date of Implementation</p> <p>30 June 2019</p>



Finding Reference: 7/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (78):</p> <p><i>The licensee must make the records for all land in respect of which water service charges apply available for inspection by any person without charge and give a copy of particular records to a person with a material interest in them, on payment of the prescribed charge.</i></p> <p>Observations:</p> <p>We observed records for all land in respect of which water charges apply are made available to customers via My Water through the Corporation's website, except for the following:</p> <ul style="list-style-type: none"> ▪ The name and address of the owner of the land; and ▪ The account number. 	<p>We recommend that the Corporation update the information provided through "My Water" to include the name and address of the owner of the land and the account number.</p>	<p>Management Comment</p> <p>A customer can access their own name, address and account number through MyWater once they have registered and logged into their account however it is not available to just "ANY" member of the public due to the Corporation's privacy policy. The Corporation views this information as personal information and will not be releasing it publically.</p> <p>Agreed Action</p> <p>No further action</p> <p>Responsible Officer</p> <p></p> <p>Date of Implementation</p> <p></p>



Finding Reference: 8/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (100):</p> <p><i>Each bill must contain the prescribed information.</i></p> <p>Observations:</p> <p>The sampled bills did not have an explicit statement that the Corporation's website contains information about estimates.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Establish a process whereby staff reviews the bill template against the Code's requirements. 2. The relevant staff member and supervisor/line manager sign off on any changes to the template of bills. 3. Update the bill template to include a statement that the Corporation's website contains information on the use of estimates. Following this, the updated bill format should be uploaded into GRANGE 	<p>Management Comment</p> <p>The Corporation has a current process for reviewing and approving the bill template. No further action required.</p> <p>Current bill template contains a generic statement and contact details for the Corporation and the EWO. If an estimate is used this is included as a bill message.</p> <p>Agreed Action</p> <p>Will update message on bill where an estimate is used.</p> <p>Responsible Officer</p> <p>Head of Customer Billing & Assurance</p> <p>Date of Implementation</p> <p>30 June 2019</p>



Finding Reference: 9/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (102):</p> <p><i>Each bill must inform the customer of the specified information and where further details can be obtained.</i></p> <p>Observations:</p> <p>We noted that bills currently do not specifically inform customers may request a 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>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Establish a process whereby staff reviews the bill template against the Code's requirements. 2. The relevant staff member and supervisor/line manager sign off on any changes to the template of bills. 3. Update the bill template to include the prescribed information 	Management Comment
		No further comments required as these recommendations are addressed in Obligation 100.
		Agreed Action
		No action required. Please refer to obligation 100.
		Responsible Officer
		N/A
Date of Implementation		
N/A		



Finding Reference: 10/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (155):</p> <p>July 2016 & October 2017 Compliance Reporting Manual:</p> <p>The licensee must pay the applicable fees and charges in accordance with the applicable regulations.</p> <p>April 2014 Compliance Reporting Manual:</p> <p>The licensee must pay the applicable fees in accordance with the Regulations.</p> <p>Observations:</p> <p>A standing charge was not paid within the allowed period. Regulation 4(4) specifies that “the amount specified in the notice is payable to the Authority within 30 days after the day on which the notice was issued.” Regulation 4(4) has therefore not been complied with.</p>	<p>We recommend that the Corporation should include an additional control (in the <i>Economic Regulation Authority Licence Fee Work Instruction</i>) by way of a reminder mechanism to ensure payment is made within the allowed period.</p>	Management Comment
		The Corporation will implement the actions below.
		Agreed Action
		The Corporation will update the <i>Economic Regulation Authority Licence Fee Work Instruction</i> accordingly.
		Responsible Officer
		Manager Risk & Assurance
Date of Implementation		
30 June 2019		



Finding Reference: 11/2018		Rating: C3
Observations	Recommendations	Management Comment
<p>Legislative Obligations (190. Section 6.2):</p> <p><i>Subject to customers complying with licensee requirements the licensee must ensure that customers connected to its Farmlands Water Systems shall have, at the outlet of the water meter to their property, a water pressure and flow as follow:</i></p> <p><i>Farmland services supplied from the Goldfields and Agriculture Water Supply, the Great Southern Town Water Supply Scheme and Mid–West Region: Max static pressure = 200 and Min flow = 3kL/day per service</i></p> <p><i>Rural water supply schemes: Max static pressure = 200 and Min flow = 1.8kL/day per service.</i></p> <p>Observations:</p> <p>The Corporation measures compliance with this obligation based on the infrastructure design model and by dividing the number of complaints received with the number of Farmland properties that receive water services, the Corporation does not comply with this obligation because it cannot provide evidence that:</p> <ul style="list-style-type: none"> ▪ It tests the pressure and flow at the outlet of the water meter to Farmland properties to determine if that they fall within the appropriate parameters; ▪ The pressure and flow at the outlet of the water meter to Farmland properties is at the required specification; ▪ When, attending to complaints in Farmland areas, they test the pressure and flow at the outlet of the water meter to Farmland properties; and ▪ After attending to complaints and rectifying the identified issues, the pressure and flow, at the outlet of the water meter to Farmland 	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Draft, approve and implement a policy, procedure and/or work instruction to ensure compliance with this obligation, which include, but not limited to, the following: <ul style="list-style-type: none"> ▪ Mandatory testing of the pressure and flow at the outlet of the water meter to Farmland properties when attending to complaints; and ▪ Documenting the pressure and flow results for the Farmland properties after attending complaints. 2. Consider investigating/testing, on a sample basis, the infrastructure for the Farmland areas to ensure that it can still provide the required pressure and flow as required by the Licence. 	<p>Agreed Action</p> <p>Water Corporation will undertake hydraulic modelling of the farmlands supply in the Goldfields and Agricultural Water Supply, the Great Southern Town Water Supply Scheme and Mid West Region</p>



Finding Reference: 11/2018		Rating: C3
Observations	Recommendations	
<p>properties, is at the required specification.</p> <p>We noted that the Corporation does not have a policy, procedure or work instruction in place to ensure compliance with this obligation.</p>		<p>farmlands schemes. Where this modelling indicates that pressures may prove marginal to meet the flow requirements in the Water Services Licencing then onsite verification of pressures will be undertaken to determine if there is non-compliance with the Licence conditions. The modelling will be reviewed every 5 years or when there is a significant change in how a scheme is operated.</p> <p>Responsible Officer</p> <p>Head of Asset Investment Planning – Regional</p> <p>Date of Implementation</p> <p>30 June 2020</p>



Finding Reference: 12/2018		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (11):</p> <p><i>The licensee must comply with the code of conduct that may be made by the ERA to the extent to which it applies to the licensee and is not inconsistent with the licence.</i></p> <p>Legislative Obligations (158):</p> <p><i>The licensee must comply with any code of conduct made by the Authority to the extent it applies to the licensee and is not inconsistent with the terms and conditions of the licence.</i></p> <p>Observations:</p> <p>The following obligations have been identified as exceptions and therefore directly impact the compliance posture of obligations 11 and 158:</p> <ul style="list-style-type: none"> ▪ #100 ▪ #102 ▪ #128 ▪ #183 <p>Obligation 12:</p> <p><i>The licensee must comply with the duties imposed on it by the Act in relation to its licence and must carry out its operations in respect of the licence in accordance with the Act.</i></p>	<p>Refer to the recommendations provided in the respective obligations identified as exceptions (under the observations heading).</p>	Management Comment
		These ratings are the result of non-compliances against other obligations and separate comments are provided.
		Agreed Action
		Raise this issue as part of the review of the Water Services Act 2012
		Responsible Officer
		Head of Risk & Assurance
Date of Implementation		
30 June 2019		



Finding Reference: 12/2018		Rating: B2
Observations	Recommendations	
<p>Observations:</p> <p>The following obligations have been identified as exceptions and therefore directly impact the compliance posture of obligations 12:</p> <ul style="list-style-type: none">▪ #31▪ #32▪ #34▪ #35▪ #36▪ #37▪ #42▪ #43▪ #49▪ #50▪ #53▪ #155▪ #164 <p>Obligation 156:</p> <p><i>Subject to any modifications or exemptions granted pursuant to the Act and this licence, the licensee must comply with any applicable legislation.</i></p> <p>Observations:</p> <p>The following obligations have been identified as exceptions and therefore directly impact the compliance posture of obligations 156:</p> <ul style="list-style-type: none">▪ #67▪ #68▪ #75▪ #78		



Finding Reference: 12/2018		Rating: B2
Observations	Recommendations	
<p>Obligation 161:</p> <p><i>The licensee must comply with any individual performance standards prescribed by the ERA.</i></p> <p>Observations:</p> <p>The following obligations have been identified as exceptions and therefore directly impact the compliance posture of obligations 161:</p> <ul style="list-style-type: none">▪ #190, Clause 1.1▪ #190, Clause 1.2▪ #190, Clause 5.1▪ #190. Clause 6.2		



Finding Reference: 16/2018		Rating: CNR
Observations	Recommendations	
<p>Legislative Obligations (20):</p> <p><i>If the licensee gives a compliance notice to a person who is undertaking construction or carrying out similar works in the vicinity of water service works, the licensee must, to the extent practicable, consult with the owner of the land on which the obstruction is located or the activity is taking place if the person to be given the notice is not the owner of the land.</i></p> <p>Observations:</p> <p>We noted the following:</p> <ul style="list-style-type: none"> No documented policy, procedure or work instruction is in place between the Asset Investment Planning Regional In Service Assets team and Operators in the Regions to report any identified issues or to negotiate an outcome with an offender and/or landowner, which negotiation process could be detrimental to the Corporation if performed incorrectly or without legal advice; and Development Services was not aware of policy, procedure or work instruction for issuing compliance notices. 	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> Draft, approve and implement, in consultation with the Legal Services and Company Secretary, a policy and procedure/work instruction, stipulating what steps to be taken by the Regional Operators and/or the Asset Investment Planning Regional In Service Assets team when issues or potential issues are identified and when entering into negotiations with an offender and/or landowner; and Provide awareness training to all staff on the <i>Compliance Notice Process Framework</i> as well as on the <i>Issuing Compliance Notices</i> work instruction 	<p>Management Comment</p> <p>The Corporation will implement the action below.</p> <p>Agreed Action</p> <p>The Corporation will update its Compliance Notice Framework document and provide awareness training were required.</p> <p>Responsible Officer</p> <p>Head of Development Services</p> <p>Date of Implementation</p> <p>30 June 2019</p>



Finding Reference: 19/2018		Rating: C1
Observations	Recommendations	
<p>Legislative Obligations (34):</p> <p><i>In certain instances, if a person authorised by the licensee carries out road work that involves breaking the surface of the road or that would cause major obstruction to road traffic, the licensee must give at least 48 hours' notice to the public authority managing the road.</i></p> <p>Observation:</p> <p>We identified the following issues:</p> <ul style="list-style-type: none"> ▪ Prior to 2017, the relevant authorities were contacted by phone, but no evidence of these calls could be provided; and ▪ Records for planned and unplanned work are not maintained sufficiently to a standard that could demonstrate compliance with this obligation. 	<p>We recommend that the Corporation ensure employees maintain sufficient records in respect of the obligation as described in the <i>Breaking The Road Surface Notification</i> work instruction.</p>	<p>Management Comment</p> <p>We agree that our folder management structure could be improved to more easily differentiate between planned and unplanned events for ease of review and audit.</p> <p>Agreed Action</p> <p>Improve the availability and management of email notifications to ensure records are readily retrievable viewing.</p> <p>Responsible Officer</p> <p>Head of Operations Performance</p> <p>Date of Implementation</p> <p>31 March 2019</p>



Finding Reference: 23/2018		Rating: C1
Observations	Recommendations	
<p>Legislative Obligations (75):</p> <p><i>If the licensee opens or breaks up the surface of a road, the licensee must complete the relevant work and reinstate and make good the road, and must take all reasonable measures to prevent that part of the road from being hazardous.</i></p> <p>Observations:</p> <p>Records have not been maintained to demonstrate the restoration work undertaken meets the requisite standards.</p> <p>Although the Corporation has the <i>Reinstatement Guidelines</i> work instruction in place, which describes how certain disturbed areas must be reinstated, it does not include the following:</p> <ul style="list-style-type: none"> ▪ A description of how and to whom the finalisation of the reinstatement must be reported to; and ▪ When, how and where to save or archive evidentiary documentation and information such as “<i>Reinstatement Reports</i>”, providing evidence of compliance with this obligation. 	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Update the current <i>Reinstatement Guidelines</i> to include a description of how and to whom the finalisation of the reinstatement must be reported to and when, how and where to save or archive evidentiary documentation and information after completion of the reinstatement; and 2. Implement the revised work instruction and provide the relevant training to employees to ensure adherence to the work instruction and ultimately the requirements of this obligation. 	<p>Management Comment</p> <p>We agree that there is an opportunity for improvement in providing more evidence of reinstatements in the relevant systems.</p> <p>Agreed Action</p> <p>We will review and improve our methods of capturing evidence of compliance with this obligation, and update the <i>Reinstatement Guidelines</i> to reflect agreed changes.</p> <p>Responsible Officer</p> <p>Head of Operations Performance</p> <p>Date of Implementation</p> <p>30 September 2019</p>