



BHP Nickel West Pty Ltd

2022 Operational Audit and Asset Management System Review Water Services Licence WL52

Report

**Economic Regulation Authority
May 2023**

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Limitations of this Report

This report was prepared for distribution to the Economic Regulation Authority and BHP Nickel West Pty Ltd for the purpose of fulfilling BHP Nickel West's operational audit and asset management system review obligations under its Water Services Licence. We disclaim any assumption of responsibility for any reliance on this report to any persons or users other than the Economic Regulation Authority and BHP Nickel West or for any purpose other than that for which it was prepared.

Because of the inherent limitations of any internal control environment, it is possible that fraud, error or non-compliance may occur and not be detected. An audit is not designed to detect all instances of non-compliance with the procedures and controls over the licence obligations of the Water Services Licence, since we do not examine all evidence and every transaction. The audit and review conclusions expressed in this report have been formed on this basis.

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1. Independent Auditor's Report

Scope

BHP Nickel West Pty Ltd has a Water Services Licence, issued by the Economic Regulation Authority ('ERA') under the *Water Services Act 2012* ('Act'), for the provision of potable water supply and sewerage services in the mining town of Leinster. There were two versions of the Water License WL52 in operation over the audit period:

- Version 1 (From 16 September 2020 to 20 September 2021) ; and
- Version 2 (From 21 September 2021 to current) - Change to licensee's name from BHP Billiton Nickel West Pty Ltd to BHP Nickel West Pty Ltd. .

We have performed a reasonable assurance engagement on BHP Nickel West's compliance, in all material respects, with the conditions of WL52 and the *Water Services Act 2012* for the period from commencement of the licence on 16 September 2020 to 30 September 2022.

Our evaluation was made against the licence obligations listed in the Water Compliance Reporting Manual 2021 and previous version May 2020; and in accordance with the ERA's 2019 Audit and Review Guidelines: Water Licences.

The scope of this assurance work relates to assessing BHP Nickel West's systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the Licence issued under the Act.

Modified Opinion

In our opinion, based on the procedures performed as outlined in the Audit Plan approved by the Economic Regulation Authority and the evidence we have obtained, except for the effects of the matters described in the Basis for Modified Opinion paragraph below, BHP Nickel West has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period 16 September 2020 to 30 September 2022.

Basis for Modified Opinion

During the period from commencement of the licence on 16 September 2020 to 30 September 2022, out of 191 applicable licence obligations, there were 12 non-compliances with a minor impact on customers, as follows:

Reporting Manual number and Licence condition		Issue
<i>The following obligations were assessed as "Non-Compliant – Minor Impact".</i>		
148A	<i>The licensee's complaints procedure must list the procedures available to the customer under the Act as to applying to the water services ombudsman or making an appeal from, or applying for a review of, the decision that gave rise to the complaint, if an appeal or review is available under regulations mentioned in section 222(2)(k).</i>	The complaints procedure in the Customer Charter – Leinster Drinking Water and Wastewater Services does not include any reference to requesting a review of any decision or the option to refer the complaint to the Energy and Water Ombudsman
149	<i>The licensee's complaints procedure must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.</i>	The auditor confirmed with Manager – HSE that a hardcopy of the Customer Charter is available upon request and at no charge. However, the Customer Charter and the Managing Customer Feedback at Leinster Procedure could not be located on the BHP Nickel West website.
153	<i>The licensee must make the prescribed information publicly available.</i>	
154A	<i>The licensee must ensure that its website contains a link to the current version of this code appearing on the website that is maintained by or on behalf of the Western Australian Government and that provides</i>	There is no link on the BHP Nickel West Leinster website to the current version of the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i> on the WA legislation site.

Reporting Manual number and Licence condition		Issue
	<i>public access to electronic versions of Western Australian legislation.</i>	
154B	<i>The licensee must maintain an up-to-date preserved supply register for the purposes of Part 9 of the Code if the licensee meets the criteria in clause 51(2). The register must record the prescribed information in clause 51(3) if the criteria in clause 51(2) applies to the licensee.</i>	<p>The Manager HSE and onsite interviews confirmed there were no disconnections of any water supply to residences during the audit period.</p> <p>The auditor was unable to sight a Preserved Supply Register.</p>
155	<i>The licensee must pay the applicable fees and charges in accordance with the Economic Regulation Authority (Licensing Funding) Regulation 2014.</i>	The fee for 2021/22 due by 30 September 2022 was not paid until December 2022. As the payment was overdue, this is considered a non-compliance with minor impact and did not affect customers.
167	<i>The licensee must provide the ERA with the data required for performance reporting purposes that is specified in the Water, Sewerage and Irrigation Licence Performance Reporting Handbook, and the National Performance Framework that apply to the licensee.</i>	<p>The auditor reviewed NiW's correspondence with the ERA and the Performance Reports for 2020/21 and 2021/22 and confirmed the reports had been submitted with the required data. The Performance Report for 2021/22 was submitted in October 2022 after the due date of 31 August 2022.</p> <p>There were also some errors identified in the 2020/21 performance data after the ERA requested review of the variances between the 2020/21 and 2021/22 Performance Reports.</p> <p>NiW has confirmed the procedures for the performance reporting and data have been improved in December 2022.</p>
184	<i>Where the licensee provides potable water, the licensee must enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health.</i>	<p>The Lead Project Engineer – NOR advised that the Memorandum of Understanding (MOU) between the Department of Health and BHP NiW for Drinking Water is being developed and is approximately 80% complete. The draft has been provided to the DoH.</p> <p>The MOU outlines the management of drinking water quality, audit of water supply systems, publication and exchange of information and data and managing events of public health significance.</p> <p>The Leinster Drinking Water Incident Response Plan includes Department of Health liaison and reporting.</p> <p>Quarterly Potable Water Reports have been provided to the DoH each quarter from June 2021 to June 2022 and have been published on the BHP NiW website.</p> <p>As it has been 2 years since the licence was approved, the MoU should be finalised.</p>
191	<i>The Licensee must have a family violence policy that sets out the matters specified in clause 5(1).</i>	<p>The auditor was advised that NiW has not yet developed a Family Violence Policy that sets out the matters specified in Clause 5(1). The matters specified in the Code relate to account, payment difficulties, financial hardship, debt management and external support services.</p> <p>Although NiW does not bill customers for water services and there are no restrictions or disconnections of water supplies as all properties are leased by NiW to customers, the Policy is still required to provide information about external support services available to the customer.</p>
192	<i>The licensee must have a family violence policy before the end of the six-month period starting on either: 9 December 2020; or if the day of the grant of the licensee's licence is after 9 December 2020, the day of the grant of the licensee's licence.</i>	
193	<i>A licensee must publish its family violence policy on its website and provide a hard copy of the policy to a customer on request and at no charge.</i>	

Reporting Manual number and Licence condition		Issue
198	<i>A licensee must ensure that its website contains a link that provides access to the current version of the code as it appears on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation.</i>	The NiW website does not have a link to the current version on the <i>Water Services Code of Practice (Family Violence Policy) 2020</i> .

We conducted our engagement in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements (ASAE 3100). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

In accordance with ASAE 3100 we have:

- Used our professional judgement to plan our procedures and assess the risks that may cause material non-compliance with each of the compliance requirements to be concluded upon;
- Considered internal controls implemented to meet the compliance requirements; however, we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.

Summary of Procedures

Our procedures consisted primarily of:

- Utilising ERA's 2019 Audit and Review Guidelines: Water Licences ('the Guidelines') to develop a risk assessment;
- Developing an Audit and Review Plan and an associated work program, approved by the ERA on 16 December 2022;
- Interviewing relevant BHP Nickel West staff to gain an understanding of process controls;
- Onsite visit to the water treatment facilities in Leinster, and conducting various meetings with stakeholders, including corporate services and works/facilities management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards. The on-site visit included our Senior Engineer.
- Assessing documents and performing walkthroughs of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations; and
- Performing procedures and testing based on the procedures listed in the approved Audit and Review Plan.

How We Define Reasonable Assurance and Material Non-Compliance

Reasonable assurance is a high level of assurance but is not a guarantee that it will always detect a material non-compliance with the compliance requirements.

Instances of non-compliance are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken on the basis of the Licensee's compliance with the compliance requirements.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with the compliance requirements may occur and not be detected.

A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the compliance requirements will continue in the future.

Use of this Assurance Report

This report has been prepared for BHP Nickel West and the ERA for the purpose of assessing compliance with the requirements of the License and may not be suitable for another purpose.

We understand that a copy of this report will be provided to the ERA for the purpose of reporting on the reasonable assurance engagement for the Licensee. We agree that a copy of this report may be provided to the ERA in connection with this purpose, but only on the basis that we accept no duty, liability or responsibility to the ERA in relation to the report.

We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Licensee and the ERA, or for any other purpose other than that for which it was prepared.

Management's responsibility

BHP Nickel West's management are responsible for:

- The compliance activities undertaken to meet the requirements of the Licence;
- Identifying risks that threaten the compliance requirements identified above being met and identifying, designing and implementing controls to enable the compliance requirements to be met and, monitoring ongoing compliance;
- Ensuring that it has complied in all material respects with the requirements of the Licence;
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements;
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the ERA; and
- Implementing corrective actions for instances of non-compliance (if any).

Our responsibility

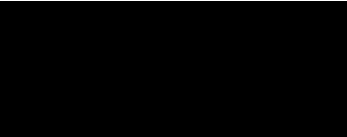
Our responsibility is to perform a reasonable assurance engagement in relation to BHP Nickel West's compliance with its License requirements throughout the period and to issue an assurance report that includes our conclusion.

Our Independence and Quality Control

We have complied with our independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants* issued by the Australian Professional and Ethical Standards Board and complied with the applicable requirements of Australian Standard on Quality Control 1 to maintain a comprehensive system of quality control.

We confirm that the ERA's 2019 Audit and Review Guidelines: Water Licenses have been complied with in the conduct of this audit/review and the preparation of the report, and that the audit findings reflect our professional opinion.

Quantum Assurance



Geoff White CA
Director

17 May 2023

2. Executive Summary

2.1 Background

BHP Nickel West Pty Ltd has a Water Services Licence, issued by the Economic Regulation Authority ('ERA') under the *Water Services Act 2012* ('Act'), for the provision of potable water supply and sewerage services in the mining town of Leinster.

Leinster is located in the northern Goldfields area of Western Australia, approximately 370 km north of Kalgoorlie on the Goldfields Highway and 650 kilometres northeast of Perth. Water supply and sewerage services to the Leinster Mine and Concentrator (Site) and the airport located 12 km and 8 km respectively to the north of town are not included in the licence.

NiW owns and operates all of the drinking water and sewerage infrastructure that services approximately 2,100 people in the township of Leinster. Leinster provides accommodation for employees and families of NiW, as well as contracting companies and government agencies that support the town. NiW has been operating and maintaining both systems at this site since 2005 and has implemented a number of upgrades and replacement of critical assets. All water services are provided to NiW employees, and others in the town without charge.

This audit and review cover the period from commencement of the licence on 16 September 2020 to 30 September 2022.

The audit and review approach is based on the compliance obligations set out in the Licence, applicable legislation, regulatory guidelines (Water Compliance Reporting Manual 2021 and previous version May 2020) and the 2019 Audit and Review Guidelines: Water Licences (updated August 2022).

2.2 Operational Audit

This audit has been conducted to assess the licensee's level of compliance with the conditions of its licence (WL52).

Through the execution of the Audit Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that BHP Nickel West has complied with its Water Services Licence obligations during the audit period from 16 September 2020 to 30 September 2022 with the exception of some obligations rated as minor impact on customers.

Out of 191 applicable compliance obligations, the audit found:

- 25 obligations were rated compliant (21 with adequate controls and 4 with controls not reviewed).
- 12 obligations were rated non-compliant with minor impact (1 with generally adequate controls – improvement needed and 11 with inadequate controls – significant improvement required).
- 154 obligations were not rated for compliance, as no relevant activity took place during the audit period (16 with adequate controls, 4 with inadequate controls – corrective action required and 134 where controls were not reviewed).

The audit confirmed that BHP Nickel West has complied with its information reporting obligations for the period 16 September 2020 to 30 September 2022.

The control environment is considered to be effective to manage compliance with the licence conditions apart from:

- improving the information about the complaints procedure available to customers,
- establishing a Preserved Supply Register;
- including the payment of ERA licence fees in a compliance calendar;
- finalising the draft Memorandum of Understanding with the Department of Health for drinking water services; and
- developing, publishing on the website and making available in hardcopy a family violence policy; and publishing a link on the website to the *Water Services Code of Practice (Family Violence Policy) 2020*.

There were 7 recommendations to address the obligations rated non-compliant (minor impact on customers or third parties).

2.3 Asset Management System Review

This review has been conducted to assess the effectiveness of the Licensee's asset management system.

Through the execution of the Review Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that BHP Nickel West has operated the scheme in a reliable manner and provided a good level of service to the residents of Leinster.

The review found that BHP Nickel West has established an adequate control environment for ongoing compliance in respect of the asset management system.

For the review period from 16 September 2020 to 30 September 2022, the potable water supply and sewerage services provided under Water Services Licence WL52 are considered to be operated with a professional and comprehensive approach.

Overall, the water supply and sewerage services are assessed as being well constructed, well maintained and in good working order.

Out of 58 effectiveness criteria for the asset management system, the review found:

- 54 criteria were rated as performing effectively (52 with adequately defined processes and 2 with processes that require improvement);
- 3 were rated as opportunity for improvement (with adequately defined processes); and
- 1 was rated as corrective action required (with adequately defined processes).

There was one recommendation relating to contingency planning, to implement the planned testing of the Incident Response Plan and to review and update the plan.

3. Operational Audit

3.1 Introduction

BHP Nickel West Pty Ltd has a Water Services Licence, issued by the Economic Regulation Authority ('ERA') under the *Water Services Act 2012* ('Act'), for the provision of potable water supply and sewerage services in the mining town of Leinster. There were two versions of the Water License WL52 in operation over the audit period:

- Version 1 (From 16 September 2020 to 20 September 2021) ; and
- Version 2 (From 21 September 2021 to current) - Change to licensee's name from BHP Billiton Nickel West Pty Ltd to BHP Nickel West Pty Ltd. .

Under the Act, water services' licensees are required to provide reports on an operational audit ('audit') and an effectiveness review of their asset management system ('review') once every 24 months, or another period that has been specified by the ERA.

The ERA engaged Quantum Management Consulting and Assurance ('Quantum Assurance') to complete an audit and review of BHP Nickel West's water supply and sewerage services, to comply with the licensing requirements of the ERA.

This audit and review covers the period from commencement of the licence on 16 September 2020 to 30 September 2022.

The audit and review approach is based on the compliance obligations set out in the Licence, applicable legislation, regulatory guidelines (Water Compliance Reporting Manual 2021 and previous version May 2020) and the ERA's 2019 Audit and Review Guidelines: Water Licences.

3.2 Objectives and Scope

The objective was to provide the ERA with an independent assessment of the licensee's compliance with relevant obligations under the licence.

The audit applied a risk-based audit approach. The scope of the audit included the adequacy and effectiveness of performance against the requirements of the licence by considering:

- **process compliance** - the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls;
- **outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period;
- **output compliance** – the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained);
- **integrity of reporting** – the completeness and accuracy of the compliance and performance reports provided to the ERA; and
- **compliance with any individual licence conditions** - the requirements imposed on the specific licensee by the ERA or specific issues that are advised by the ERA.

When assessing if a licensee has complied with its licence obligations, the auditor must apply a level of scrutiny that corresponds to a 'reasonable assurance engagement'. A reasonable assurance engagement is:

"An assurance engagement in which the assurance practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the assurance practitioner's conclusion. The assurance practitioner's conclusion is expressed in a form that conveys the assurance practitioner's opinion on the outcome of the measurement or evaluation of the underlying subject matter against criteria." (ASAE3000)

The highest priority areas (priority 1, 2 or 3) based on inherent risk were:

- Cut off water supply to occupied dwelling (obligation 21); and
- Preserved water supply register and restrictions on reduced supply (obligations 154B, 154C and 154D).

The audit aimed to identify any areas where improvement is required and recommend corrective action as necessary.

3.3 Audit Compliance and Controls Rating Scale

The adequacy of controls and compliance with the legislative obligations were assessed using the following ratings.

Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties
NP	Not performed – controls not assessed in the audit.	NR	Not rated – no activity in current period

The compliance rating was assessed using the residual risk ratings ('impact') as outlined below.

Potential Impact on Customers or Third Parties

Category	Description
Major	Classified on the basis that: <ul style="list-style-type: none"> • The consequences of non-compliance would cause major damage, loss or disruption to customers; or • The consequences of non-compliance would endanger or threaten to endanger the safety or health of a person.
Moderate	Classified on the basis that: <ul style="list-style-type: none"> • The consequences of non-compliance impact the efficiency and effectiveness of the licensee's operations or service provision but do not cause major damage, loss or disruption to customers; or • The regulatory obligation is not otherwise classified as Type 1 or Type NR non-compliance (for reporting purposes).
Minor	<ul style="list-style-type: none"> • The consequences of non-compliance are relatively minor – i.e., non-compliance will have minimal effect on the licensee's operations or service provision and will not cause damage, loss or disruption to customers; or • Compliance with the obligation is immeasurable; or • The non-compliance is required to be reported to the Regulator under another instrument, guideline or code; or • The non-compliance is identified by a party other than the licensee; or • The licensee only needs to use its reasonable endeavours or best endeavours to achieve compliance, or the obligation does not otherwise impose a firm obligation on the licensee.

Reference: Water Compliance Reporting Manual 2021

3.4 Summary of Audit Ratings of Controls and Compliance

The current audit assessment of the ratings for the adequacy of controls and compliance with the 191 applicable legislative obligations is shown below in the summary table and detailed obligations table.

Summary of Audit Ratings of Control and Compliance

Controls rating	Compliance Rating						Total
	Rating	1 Compliant	2 Non-compliant (minor impact)	3 Non-compliant (moderate impact)	4 Non-compliant (major impact)	NR Not rated	
	A - Adequate	21	-	-	-	16	37
	B – Generally adequate	-	1	-	-	-	1
	C - Inadequate	-	11	-	-	4	15
	D – No controls	-	-	-	-	-	-
	NP – Not performed	4	-	-	-	134	138
	Total	25	12	-	-	154	191

Detailed Audit Ratings of Controls and Compliance by Obligation

The current audit assessment of the ratings for the adequacy of controls and compliance with the legislative obligations is shown below.

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant 2=Non-compliant - minor impact, 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
Water Services Act 2012													
2	Terms of service	Sec. 21(1)(b)	4					✓					✓
3	Provision of services	Sec. 21(1) (c)	4	✓					✓				
4	Operating area	Sec. 22	4					✓					✓
5	Outsourcing of services	Sec. 23	4	✓					✓				
6	Asset management system	Sec. 24(1)(a) & 24(2)	4	✓					✓				
8	Asset management system review	Sec. 24(1)(c)	4	✓					✓				
9	Operational audit	Sec. 25	4	✓					✓				
10	Code of practice	Sec. 26(3)	4					✓					✓
13	Termination of service	Sec. 36	4					✓					✓
14	Supplier of last resort	Sec. 60	4					✓					✓
15	Ombudsman scheme	Sec. 70(2)	4					✓	✓				

¹ The number refers to the Obligation reference in the Water Compliance Reporting Manual 2020 and previous versions 2017 and 2018 where applicable.

² Refer Controls and Compliance Rating Scales in Section 3.3.

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant - minor impact, 3=Non-compliant - moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
16	Interruption of water supplies	Sec. 77(3)	4	✓					✓				
17	Notification of building works	Sec. 82(4) & (5)	4					✓					✓
18	Ensuring water service works are done	Sec. 84(2)	4					✓					✓
19	Review of decisions	Sec. 87(2)	4					✓					✓
20	Construction near water service works	Sec. 90(7)	4					✓					✓
21	Cut off water supply	Sec. 95(3)	2	✓									✓
22	Fire hydrants for reticulation works	Sec. 96(1)	4					✓					✓
23	Requests from FESA or local government	Sec. 96(5)	4					✓					✓
24	Connect wastewater inlet	Sec. 98(3)	4					✓					✓
25	Compliance notice re sewerage	Sec. 106(2)	4					✓					✓
28	Compliance notice issued by licensee re building works	Sec. 119(2)	4					✓					✓
29	Review of decisions	Sec. 122(2)	4					✓					✓
30	Apportionment of fees between properties	Sec. 125(2)	4					✓					✓
31	Lodging memorial to secure fees owing	Sec. 128(4)	4					✓					✓
32	Notice to property owner - entry	Sec. 129(5)	4	✓					✓				
33	Notice to property owner – removal of fence	Sec. 139(3)	4					✓					✓
34	Notice to roads authority	Sec. 141(1)	4					✓					✓
35 36 37 38 39	Proposal for major works	Sec. 142, 143(2) & (3), 144(3), 145(2)	4					✓					✓
40 41	Proposal for general works – Minister notices	Sec. 147(3) & (4)	4					✓					✓
42 43 44 45	Proposal for general works	Sec. 151(1) - (3), 153(3),	4	✓									✓
46 47 48	Interest in land	Sec. 166(5) - (6), 170	4					✓					✓

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant - minor impact, 3=Non-compliant - moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
49 50	Notice of entry to property and authority to enter	Sec. 173(4) & 174 (1)	4	✓									✓
51	Notice of entry after entry without notice	Sec. 174 (3)	4	✓									✓
52 53 54 55 56 57	Notice of entry to property and authority to enter	Sec. 175(2) & (5), 176(1), (3) & (4) 181	4	✓									✓
58 59 60 61	Warrant to enter property	Sec. 186, 187(1) - (3), 190(4) - (5)	4					✓					✓
62	Compliance Officer	Sec. 210(5)	4					✓					✓
63	Minimum disruption	Sec. 218(2)	4					✓					✓
64	Physical damage	Sec. 218(3)	4					✓					✓
Water Services Regulations 2013													
65	Meter testing – multi-unit	Reg. 23(2)	4					✓					✓
66	Meter testing - compliance	Reg. 24(4)	4					✓					✓
67	Meter access - compliance	Reg. 26(3)	4					✓					✓
68	Meter testing tolerance	Reg. 26(5)	4					✓					✓
69	Lot development	Reg. 29(1)	4					✓					✓
70 71 72	Backflow prevention devices	Reg. 42(2), 43(3), 43(6).	4					✓					✓
74	Work affecting roads	Reg. 60(2)	4					✓					✓
75	Breaks to road surface	Reg. 63	4					✓					✓
89	Compliance notice information	Reg. 85	4					✓					✓
Water Services Code of Conduct (Customer Service Standards) 2018													
92	Information for customers	Cl. 8(1)-(3)	4					✓					✓
93	Service connections period	Cl. 9(2) & (4)	4					✓					✓
94	Annual service charges	Cl. 10(2)	4					✓					✓
95 96	Usage bills at least 4 monthly	Cl. 11(2) & (3)	4					✓					✓
98	Estimated Bill of Usage	Cl. 11(5)	4					✓					✓
98A	Estimated Bill at least every 12 months	Cl. 11(6)	4					✓					✓

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant - minor impact, 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
99	Address for billing	Cl. 12	4					✓					✓
100	Billing information	Cl. 13(1)	4					✓					✓
100A	Billing information – more than one service	Cl. 13(3)	4					✓					✓
101	Billing information - usage	Cl. 13(4)	4					✓					✓
101A	Billing information - estimate	Cl. 13(5)	4					✓					✓
102A	Billing information – prescribed information	Cl. 13(6)	4					✓					✓
103 104	Basic of billing estimate	Cl. 14(1) & (2)	4					✓					✓
104A	Tariff information	Cl. 15(3)	4					✓					✓
105	Request for meter reading	Cl. 16(1)	4					✓					✓
106	Higher than normal charge	Cl. 17(2) & (3)	4					✓					✓
107 108 109 110	Under and over charges	Cl. 18(2) - (5).	4					✓					✓
111A	Over charges - refunds	Cl. 19(2)	4					✓					✓
112A 112B 112C	Over charges - refunds	Cl. 19(3)-(5)	4					✓					✓
113	Review of bill upon request	Cl. 20(1)	4					✓					✓
114	Review of bill procedure – written procedure	Cl. 20(2)	4					✓					✓
115	Review of bill procedure – information	Cl. 20(3) & (6)	4					✓					✓
116	Review of bill procedure – ombudsman	Cl. 20(4)	4					✓					✓
117	Review of bill procedure – timeframe	Cl. 20(5)	4					✓					✓
117A	Notification of change in water service charge	Cl. 21	4					✓					✓
118	At least 14 days for payment	Cl. 23	4					✓					✓
119	Payment methods - options	Cl. 24(1)	4					✓					✓
120	Payment methods - fees	Cl. 24(2)	4					✓					✓
121	Payment methods- direct debit authority	Cl. 25(1)	4					✓					✓

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant - minor impact, 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
122	Payment in advance	Cl. 26(1)	4					✓					✓
123	Redirection of bills	Cl. 27	4					✓					✓
124A 124B 124C	Payment plan	Cl. 28(2), (3) & (4).	4					✓					✓
125 126A 126B 127	Financial hardship policy	Cl. 29(1) - (5)	4					✓					✓
128	Financial hardship policy - publicly available	Cl. 29(6)	4					✓					✓
129A	Financial hardship policy – review	Cl. 29(7)	4					✓					✓
129B	Financial hardship policy – review if directed	Cl. 29(8)	4					✓					✓
129C	Financial hardship – payment variations	Cl. 29(9)	4					✓					✓
130A 130B 131A 131B 131C	Financial hardship – payment variations	Cl. 30(2) & (3), 30(4)(a)-(c)	4					✓					✓
133	Written information re payment assistance	Cl. 31 (4) & (5)	4					✓					✓
133A	No interest in some circumstances	Cl. 32	4					✓					✓
134	Debt recovery - complaint	Cl. 33(1)(a) – (c)	4					✓					✓
134A	Debt recovery – payment plan	Cl. 33(1)(d) – (e)	4					✓					✓
135 136	Restoring water supply	Cl. 40(1) & (2)	4					✓					✓
137A 137B 137C 138 138A 138B	Water supply restriction	Cl. 36(1)-(3), 37(1)(a)-(h) & 38	4					✓					✓
139	Rate of flow	Cl. 39	4					✓					✓
142	Restoring water supply	Cl. 41(4)	4					✓					✓
144	Compliance rate	Cl. 41(6)	4					✓					✓
144A 144B	Notice of planned service interruptions	Cl. 43(1)-(2)	4	✓					✓				
144C 144D	Policy for dealing with leaks and blockages	Cl. 44(1) - (2)	4	✓					✓				
144E	24 hour information line	Cl. 45	4	✓					✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant - minor impact, 3=Non-compliant - moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
145 146	Complaints procedure - written	Cl. 46(1) - (2)	4	✓					✓				
147	Complaints procedure - details	Cl. 46(3)	4	✓					✓				
148A	Complaints procedure - Ombudsman	Cl. 46(4)	4			✓				✓			
149	Complaints procedure publicly available	Cl. 46(5)	4			✓				✓			
149A	Resolution of complaints	Cl. 47	4			✓							✓
150	No charge for information	Cl. 48(1)	4			✓							✓
152	Access to customer information	Cl. 48(2)	4					✓					✓
153	Code of Conduct publicly available in hardcopy and on website	Cl. 49(1)	4			✓				✓			
154	Bill information on website	Cl. 49 (2)	4					✓					✓
154A	Link to WA website	Cl. 49(3)	4			✓				✓			
154B	Preserved supply register	Cl. 51(1),(3)	2			✓				✓			
154C 154D	Preserved supply register	Cl. 52 & 53	2			✓							✓
Licence Conditions – Specific Clauses													
155	Fees to regulator	Cl. 4.2.1	4			✓				✓			
159	Direction from ERA	Cl. 4.1.2	4					✓					✓
160	Compliance with Accounting Standards	Cl. 4.6.1	4	✓					✓				
161	Compliance with performance standards	Cl. 5.2.1	4	✓					✓				
162	Operational audit	Cl. 5.3.4	4	✓					✓				
163	External administration	Cl. 4.7.1(a)-(c)	4					✓					✓
165	Provision of information to ERA	Cl. 4.8.1	4	✓					✓				
167	Performance reporting to ERA	Cl. 4.8.2	4		✓					✓			
168	Publishing information	Cl. 3.8.1 & 3.8.2	4					✓					✓
169	Notices in writing	Cl. 3.7.1	4					✓	✓				
170A	Notify ERA of asset management system (AMS)	Cl. 5.1.1 (a) & (b)	4					✓	✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant - minor impact, 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
171	Notify ERA of material change to AMS	Cl. 5.1.3	4	✓									✓
172	AMS review	Cl. 5.1.7	4	✓					✓				
172A 172B	ERA direction re condition of service	Cl. 6.1.1- 6.1.2	4					✓					✓
181	Obligations of supplier of last resort	Cl. 6.3.1	4					✓					✓
182	No services outside operating area	Cl. 4.4.1(b)	4	✓									✓
184	MOU with Department of Health (water)	Cl. 7.1.1	4			✓				✓			
184A	MOU with Department of Health (sewerage)	Cl. 7.1.2 7.1.3	4					✓					✓
184B	MOU with Department of Health (water separate to sewerage)	Cl. 7.1.3	4					✓					✓
185	MOU legal compliance	Cl. 7.1.4	4					✓					✓
186	MOU compliance	Cl. 7.1.5	4					✓					✓
187	MOU published	Cl. 7.1.6	4					✓					✓
188	MOU - audit reports published	Cl. 7.1.7	4					✓					✓
189	MOU – other reports published	Cl. 7.1.8	4					✓	✓				
190	Service and performance standards	Schedule 2	4	✓					✓				
Water Services Code of Practice (Family Violence) 2020													
191	Family violence policy (191 to 198 from March 2021)	Cl. 5(1)	4			✓				✓			
192	Family violence policy before the end of the six-month period	Cl. 5(2)	4			✓				✓			
193	Publish family violence policy on website	Cl. 6	4			✓				✓			
194	Review of family violence policy once every 5-year period	Cl. 7	4					✓					✓
195	Records of compliance with this code	Cl. 8(1)	4					✓					✓
196	Retain records for at least 7 years	Cl. 8(2)	4					✓					✓
197	Inform customers of complaints procedure	Cl. 9	4					✓					✓
198	Website link to current copy of this Code	Cl. 10	4			✓				✓			

3.5 Detailed Audit Observations

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
Water Services Act 2012							
2	Section 21(1)(b)	Clause 4.3.1(b)	The licensee must if requested, offer to provide the water service authorised by the licence to any other person (not covered by section 21(1)(a) of the Act) within the operating area of the licence on reasonable terms, unless provision of the service is not financially viable or is otherwise not practicable.	4	The Manager – Health, Safety and Environment (HSE) confirmed that connections are made if any new residences or commercial properties are leased. There have been no new connections in the audit period. There are 314 connected properties for drinking water and 297 properties for sewerage services.	NP	NR
3	Section 21(1)(c)	Clauses 4.1.1	The licensee must provide, operate and maintain the water service works specified by the ERA in the licence for the purpose of section 11(3).	4	The operation and maintenance of the drinking water service and sewerage works were confirmed by this audit. This obligation is documented in the Asset Management Plan – Leinster Drinking Water Supply System ('Drinking Water AMP') and Asset Management Plan – Leinster Sewerage System ('Sewerage AMP').	A	1
4	Section 22	Clause 4.4.1(a)	The licensee must notify the ERA as soon as practicable before commencing to provide the water service outside of the operating area of the licence.	4	The auditor confirmed with the Manager HSE and by site observation that the licensee does not provide any services outside of the operating areas set out in Plan Number OWR-OA-318.	NP	NR

³ The number refers to the item reference in the Water Compliance Reporting Manual 2021, ERA or if applicable, 2020 manual.

⁴ The highest priority areas (priority 1, 2 or 3) based on inherent risk and expected controls/processes are highlighted in **RED**.

⁵ Controls Rating Scale: A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed.

⁶ Compliance Rating Scale: 1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated.

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
5	Section 23	Clause 4.5.1	All water service works used by the licensee in the provision of a water service must be held by the licensee or must be covered by a works holding arrangement.	4	The auditor confirmed with the Manager HSE, onsite interviews and review of the Asset Management Plans that the water service assets are owned or operated by BHP Nickel West ('NiW'). This obligation is documented in the Drinking Water AMP and Sewerage AMP.	A	1
6	Sections 24(1)(a) & 24(2)	Clause 5.1.1	The licensee must provide for an asset management system in respect of the licensee's water service works.	4	This audit confirmed the licensee has an asset management system (AMS). This obligation is documented in the Drinking Water AMP and Sewerage AMP.	A	1
8	Section 24(1)(c)	Clause 5.1.4	A licensee must provide the ERA with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	4	Reviews of the asset management system have been completed as required by the ERA. This obligation is documented in the Drinking Water AMP and Sewerage AMP.	A	1
9	Section 25	Clause 5.3.1	A licensee must, not less than once every 24 months, or such longer period as determined by the ERA, provide the ERA with an operational audit conducted by an independent expert appointed by the ERA.	4	This is the first audit since the licence was issued by the ERA in September 2020. This obligation is documented in the Drinking Water AMP and Sewerage AMP.	A	1
10	Section 26(3)	Clause 4.1.1	The licensee must comply with each code of practice made by the Minister to the extent to which it applies to the licensee.	4	The auditor confirmed here have been no codes of practice issued by the Minister.	NP	NR
13	Section 36	Clause 4.1.1	If the licensee ceases to provide a water service in an area, the licensee must ensure that the water service works are left in a safe condition and must not	4	The auditor confirmed with Manager HSE and field observation that the licensee did not cease to provide a water service in the area.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			remove any part of the works except with the approval of the Minister.				
14	Section 60	Clause 6.3.1	If the licensee is the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of the supplier of last resort and must comply with the relevant duties and carry out the relevant operations prescribed.	4	The auditor confirmed with Manager HSE that NiW is not a supplier of last resort. There is also no appointment in the licence. However, NiW is the only supplier of drinking water for Leinster and has the Leinster Drinking Water Incident Response Plan to cover any interruptions to drinking water supplies.	NP	NR
15	Section 70(2)	Clause 6.2.1	The licensee must not supply water services to customers unless the licensee: <ul style="list-style-type: none"> • is a member of the water services ombudsman scheme; and • is bound by the scheme; and • will comply with any decision or direction of the water services ombudsman under the scheme. 	4	The auditor confirmed with Manager HSE that during the audit period, NiW was a member of the Energy and Water Ombudsman Scheme and was bound by the scheme and complied with any directions. The membership was also confirmed by the Ombudsman website and payment of the fee for 2021/22.	NP	1
16	Section 77(3)	Clause 4.1.1	The licensee must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for.	4	NiW has ensured that the supply of water services has been maintained and the occurrence and duration of interruptions has been kept to a minimum. As reported in the Performance Reports for 2020/21 and 2021/22 to the ERA, there were 5 unplanned interruptions for an average duration of 120 minutes each year. NiW has taken reasonable steps to minimise disruptions. There have been no customer complaints over the audit period.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					The control is the Leinster Drinking Water Incident Response Plan.		
17	Sections 82(4) & (5)	Clause 4.1.1	If a person must give the licensee notice of any building work to be carried out on land in the operating area of a license, the licensee must return a copy of the plans and specifications contained in the notice with any written directions about the proposed building work that the licensee considers necessary to ensure the safety and efficacy of the provision of water services provided, or to be provided. The licensee must do this within 7 days of receiving the fee for dealing with the notification.	4	The auditor confirmed with Manager HSE that no notices were given in the audit period for any additional water service works.	NP	NR
18	Section 84(2)	Clause 4.1.1	If the licensee has given a notice under section 83(3)(a) of the Act, and the licensee is satisfied that the person given the notice is not going to comply with the notice within a reasonable time, the licensee must give the person 21 days' notice of its intention to commence the works.	4	As per obligation 17 above.	NP	NR
19	Section 87(2)	Clause 4.1.1	If a person makes an application with the State Administrative Tribunal for a review of a decision in respect of the licensee providing additional water services when a person has not responded to the licensee's notice, the licensee cannot provide the works until the application has been finally dealt with, except in limited circumstances.	4	As per obligation 17 above.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
20	Section 90(7)	Clause 4.1.1	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.	4	As per obligation 17 above.	NP	NR
21	Section 95(3)	Clause 4.1.1	The licensee cannot cut off the supply of water to an occupied dwelling unless the occupier agrees to that.	2	The auditor confirmed with Manager HSE that, during the audit period, the licensee did not cut off the supply of water to any occupied dwelling. The policy is to not cut off the water supply. This obligation is documented in the Customer Charter – Leinster Drinking Water and Wastewater Services.	A	NR
22	Section 96(1)	Clause 4.1.1	If the licensee provides water supply reticulation works, or enters into an agreement for the provision of water supply reticulation works, the licensee must install fire hydrants attached to those works in accordance with the requirements of FESA, or the relevant local government as to the location and type of hydrant.	4	The auditor confirmed with Manager HSE that there have been no requests from the Department of Fire and Emergency Services (DFES) to instal fire hydrants.	NP	NR
23	Section 96(5)	Clause 4.1.1	The licensee must comply with requests made by FESA or a local government under sections 96(3) and 96(4) of the Act to the extent practicable and within a reasonable time.	4	Manager HSE advised that no formal requests have been received from DFES or the local government authority.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
24	Section 98(3)	Clause 4.1.1	If required to by the Minister, the licensee must connect a wastewater inlet on land to the sewerage works of the licensee.	4	The Manager HSE confirmed there have been no requests by the Minister to connect a wastewater inlet to sewerage works.	NP	NR
25	Section 106(2)	Clause 4.1.1	The licensee must include the information specified in a compliance notice given in relation to failure to maintain fittings, fixtures and pipes. (sewerage)	4	The Manager HSE confirmed there have been no compliance notices issued in the audit period.	NP	NR
28	Section 119(2)	Clause 4.1.1	The licensee must include the information specified in a compliance notice given in relation to the matters set out in section 119(1).	4	The auditor confirmed with Manager – HSE and the onsite visit that all construction is managed by NiW or contracted, so no compliance notices would be issued.	NP	NR
29	Section 122(2)	Clause 4.1.1	If a person makes an application to the State Administrative Tribunal under section 122(1), the licensee cannot take, or continue to take, action against the person except in the circumstances specified.	4	As per obligation 28.	NP	NR
30	Section 125(2)	Clause 4.1.1	If the licensee provides a water supply, sewerage or drainage service to 2 or more dwellings on land by a single property connection, the licensee may apportion fees. The licensee cannot apportion fees to the extent inconsistent with any agreement related to such a provision of services, or section 66 of the <i>Strata Titles Act 1985</i> .	4	The auditor confirmed with Manager HSE that no fees are charged or apportioned between any single connections. There is no charge for any water services.	NP	NR
31	Section 128(4)	Clause 4.1.1	If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of	4	The auditor confirmed with Manager HSE that no memorials have been lodged in the audit period.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			memorial with Registrar along with the prescribed fee (if any) if the charge or contribution has been paid.				
32	Section 129(5)	Clause 4.1.1	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.	4	The auditor confirmed with Manager – HSE and the site visit that if entry was required, at least 3 days' notice is given. For any planned interruptions to water services during the audit period, the required notice was given to residents. None required entry to the dwellings. This obligation is documented in the Customer Charter.	A	1
33	Section 139(3)	Clause 4.1.1	If the licensee removes or erects a fence or gate when exercising a works power conferred by the Act, the licensee must take all reasonable steps to notify the owner before doing so.	4	The auditor confirmed with the site visit that no construction work required entry to premises.	NP	NR
34	Section 141(1)	Clause 4.1.1	A person authorised by the licensee may enter a road and exercise a works power of the licensee without consent, notice or warrant unless the exercise of the power involves opening or breaking up the surface of the road, or would cause a major obstruction of the road or disruption of the traffic, in which case the licensee must give at least 48 hours' notice to the public authority that has control or management of the road.	4	The auditor confirmed with Manager HSE and the onsite interviews that any road works would include giving at least 48 hours' notice to the local government authority (Shire of Leonora). There were no notices give in the audit period	NP	NR
35	Sections 142	Clause 4.1.1	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 by section 148.	4	The auditor confirmed with Manager HSE, onsite interviews and review of the Asset Management System documentation that no major works have occurred during the audit period. The auditor confirmed that any major water works would include obtaining regulatory approvals and	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					giving notice to the community and stakeholders. The BHP – Capital Projects sets out the requirements for any capital projects of US\$2 million or greater including approvals to be obtained.		
36	Sections 143 (2)	Clause 4.1.1	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.	4	As per obligation 35	NP	NR
37	Sections 143 (3)	Clause 4.1.1	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.	4	As per obligation 35	NP	NR
38	Section 144(3)	Clause 4.1.1	The licensee must have regard to an objection or submission lodged within the relevant period.	4	As per obligation 35	NP	NR
39	Section 145(2)	Clause 4.1.1	If the licensee makes alterations to the plans or details referred to in section 143(2), the licensee must give written notice of the alterations to any person who is likely to be adversely affected by those alterations.	4	As per obligation 35	NP	NR
40	Section 147(3)	Clause 4.1.1	The licensee must comply with a direction given by a Minister in respect of a proposal to provide water service works that are major works under section 143(3).	4	As per obligation 35	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
41	Section 147(4)	Clause 4.1.1	If the Minister gives a direction that further notices in relation to the proposed major works be given under section 143(3), the licensee must resubmit the proposal.	4	As per obligation 35	NP	NR
42	Section 151(1)	Clause 4.1.1	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.	4	The auditor confirmed by review of the Asset Management System documentation that no general works have occurred during the audit period. Any building works are assessed by the Shire of Leonora. Applications for water services from commercial customers are reviewed by NiW engineers. The Leinster Drinking Water Supply Operations and Maintenance Manual details the approach to operating and maintaining the Leinster drinking water supply system.	A	NR
43	Section 151(2)	Clause 4.1.1	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.	4	As per obligation 42.	A	NR
44	Section 152(3)	Clause 4.1.1	The licensee must have regard to an objection or submission lodged by the date specified in the notice given under section 151(2).	4	As per obligation 42.	A	NR
45	Section 153(3)	Clause 4.1.1	If the licensee makes alteration to those plans or details referred to in section 151, the licensee must give written notice of the alterations to any person who is likely to be adversely affected by those alterations.	4	As per obligation 42.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
46	Section 166(5)	Clause 4.1.1	On being advised by the Minister that an interest in land is appropriate to the licensee's needs, the licensee is required to acquire the interest.	4	The Manager HSE confirmed that no advice re acquiring an interest in land, has been received from the Minister.	NP	NR
47	Section 166(6)	Clause 4.1.1	Any costs incurred in taking an interest in land are to be paid by the licensee.	4	As per obligation 46.	NP	NR
48	Section 170	Clause 4.1.1	The licensee must not sell an interest in land if the purchaser would hold a parcel of land that did not comply with the minimum lot size and zoning requirements under the <i>Planning and Development Act 2005</i> , unless the Minister permits the licensee to do so.	4	As per obligation 46.	NP	NR
49	Section 173(4)	Clause 4.1.1	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.	4	The auditor confirmed with the Manager HSE and onsite interviews that there was no entry to premises in the audit period. If entry was required, at least 3 days' notice would be given (usually 5 to 7 days). This obligation is stated in the Customer Charter.	A	NR
50	Section 174(1)	Clause 4.1.1	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.	4	The auditor confirmed with the Manager – HSE, onsite interviews and review of the procedures that 3 days' notice was given in writing and set out the purpose of entry, for any entry to outside of dwellings. There was no entry to premises in the audit period. This obligation is stated in the Customer Charter.	A	NR
51	Section 174(3)	Clause 4.1.1	Even if in a particular instance the licensee may enter a place under the Act without having to give notice of proposed entry, the licensee must when	4	The auditor confirmed with the Manager HSE and onsite interviews that there were no unplanned entries to premises.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			practicable, and when it will not compromise the reason for entry, give notice of entry to the occupier.		This obligation is stated in the Customer Charter.		
52	Section 175(2)	Clause 4.1.1	If an occupier is present when the licensee proposes to enter a dwelling, the licensee must perform the prescribed actions before entering the premises.	4	The auditor confirmed with the Manager – HSE and onsite interviews that no entry was required to any dwelling. This obligation is stated in the Customer Charter.	A	NR
53	Section 175(5)	Clause 4.1.1	If the licensee enters a dwelling that is unoccupied, the licensee must leave a notice, which includes the prescribed information, or a copy of the warrant (as applicable) in a prominent position in the dwelling before leaving the dwelling.	4	As per obligation 52.	A	NR
54	Section 176(1)	Clause 4.1.1	If the licensee has entered a place with or without consent, the licensee must leave the premises as soon as practicable after being notified that the owner or occupier has refused or withdrawn their consent.	4	As per obligation 52.	A	NR
55	Section 176(3)	Clause 4.1.1	The licensee must produce their certificate of authority if asked to do so, and must not perform, or continue to perform, a function under the Act if they are not able to do so.	4	As per obligation 52.	A	NR
56	Section 176(4)	Clause 4.1.1	If the licensee enters or proposes to enter a place, and the owner or occupier requests the licensee produce evidence of authority for that entry, then the licensee must leave the place if they are unable to do so unless the owner or occupier agrees otherwise.	4	As per obligation 52.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
57	Section 181	Clause 4.1.1	The licensee, or a person assisting the licensee, must, as far as is practicable comply with any reasonable request from the owner or occupier intended to limit interference with the lawful activities of the owner or occupier.	4	As per obligation 52.	A	NR
58	Section 186	Clause 4.1.1	If the licensee applies for a warrant, the application must contain the prescribed information.	4	The auditor confirmed with Manager HSE that no compliance notices or warrants had been applied for or issued during the audit period.	NP	NR
59	Sections 187(1) – (3)	Clause 4.1.1	If the licensee applies for a warrant to enter, the application must be made in accordance with the procedures specified depending on the location of the applicant and the justice.	4	As per obligation 58.	NP	NR
60	Section 190(4)	Clause 4.1.1	Unless required to give a copy of the warrant, the licensee executing the warrant must produce the warrant for inspection by the occupier of the place concerned on entry (if practicable), and if requested to do so.	4	As per obligation 58.	NP	NR
61	Section 190(5)	Clause 4.1.1	On completing the execution of a warrant the licensee must record the prescribed information on that warrant.	4	As per obligation 58.	NP	NR
62	Section 210(5)	Clause 4.1.1	If the licensee designates a person as an inspector or compliance officer, the licensee must give that person a certificate of authority that includes certain prescribed information.	4	The auditor confirmed with Manager HSE that no persons have been designated as inspectors or compliance officers.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
63	Section 218(2)	Clause 4.1.1	In the exercise or purported exercise of a power under the Act, the licensee must ensure that, to the extent practicable, the free use of any place is not obstructed, and that as little damage, harm or inconvenience is caused as is possible.	4	The auditor confirmed with the Manager – HSE and onsite interviews that no entry was required to any dwelling.	NP	NR
64	Section 218(3)	Clause 4.1.1	If the licensee does any physical damage in the exercise of a works power or a power of entry, the licensee must ensure that the damage is made good, and pay compensation to the extent that it is not practicable to make good the damage.	4	The auditor confirmed with the Manager – HSE and onsite interviews that no entry was required to any dwelling.	NP	NR
Water Services Regulations 2013							
65	Regulation 23(2)	Clause 4.1.1	If the licensee provides a water supply service in respect of a multi-unit development, the licensee must, on the request of the owner or the strata company, assess whether a meter is satisfactory for measuring the quantity or flow of water passing through a pipe supplying water to the unit.	4	As there are no meters for the water service to dwellings, this obligation is not rated.	NP	NR
66	Regulation 24(4)	Clause 4.1.1	If the licensee gives a compliance notice to a person in respect of access to meters, the notice must specify the specified information.	4	As per obligation 65.	NP	NR
67	Regulation 26(3)	Clause 4.1.1	If the owner or occupier requests the licensee to test a meter and pays the charge (if any) for testing that type of meter, the licensee must test the meter in accordance with a procedure	4	As per obligation 65.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			approved by the CEO for the purpose of this regulation.				
68	Regulation 26(5)	Clause 4.1.1	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).	4	As per obligation 65.	NP	NR
69	Regulation 29(1)	Clause 4.1.1	The licensee must, on the written request of a developer who is required to pay the licensee an infrastructure contribution in respect of a subdivided lot, defer the payment of the contribution unless regulations 29(3) or 29(4) applies.	4	The audit confirmed with the Manager HSE that there would be no requests from developers to pay an infrastructure contribution and therefore, no requests to defer payment.	NP	NR
70	Regulation 42(2)	Clause 4.1.1	The written order requiring the owner or occupier of land to install a backflow prevention device must set out the date which the device must be installed and tested (which must be at least 7 days after the order is given).	4	As there are no meters for the water service to dwellings, this obligation is not rated.	NP	NR
71	Regulation 43(3)	Clause 4.1.1	The compliance notice given by the licensee to the owner or occupier of land must specify that the backflow prevention device be tested or maintained in accordance with the standard and the date by which the testing or maintenance is required to be done (which must be at least 7 days after the day the notice is given to the owner or occupier).	4	As per obligation 70.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
72	Regulation 43(6)	Clause 4.1.1	The compliance notice requiring the owner or occupier of land to have their backflow prevention device made good as specified in the notice must include the work that is required to be done, the manner in which the work is to be done and the date by which the work is to be done (which must be at least 7 days after the notice is given)	4	As per obligation 70.	NP	NR
74	Regulation 60(2)	Clause 4.1.1	If the licensee proposes to exercise a works power in a road and considers that it is necessary to alter the position of infrastructure, the licensee must notify the person who is responsible for the infrastructure and may request that the person make the alterations within the time specified in the notice.	4	The auditor confirmed with the Manager HSE that any road works would include giving at least 48 hours' notice to the local government authority and the residents. The auditor confirmed with that no works had been carried out in the audit period.	NP	NR
75	Regulation 63	Clause 4.1.1	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.	4	As per obligation 74.	NP	NR
89	Regulation 85	Clause 4.1.1	Compliance notices issued by the licensee must include a brief description of the possible consequences under the Act of not complying with the notice, and the rights of review under the Act in relation to the notice and who may apply for review.	4	The auditor confirmed with Manager HSE that no compliance notices were issued in the audit period for any water service works.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
Water Services Code of Conduct (Customer Service Standards) 2018							
92	Clause 8(1)-(3)	Clause 4.1.1	<p>The licensee must have written information for customers about the prescribed matters regarding connections and the information must be publicly available.</p> <p><i>Note: The information required by clause 8(2)(a) applies to the Water Corporation, Bunbury Water Corporation and Busselton Water Corporation only and the information required by clause 8(2)(g) applies only to licensees that supply potable water that is treated by the customer).</i></p>	4	As the residential properties are leased to customers by NiW, water services are already connected. Therefore, this obligation is not rated.	NP	NR
93	Clause 9(2) and (4)		The licensee must ensure that, in any 12-month period, 90% of water supply service connections are completed before the end of 10 business days, starting on the day on which the customer has paid the relevant fees and complied with the relevant requirements.	4	There were no new connections during the audit period as confirmed by Manager HSE and the Water Licence Performance Reports to the ERA for the audit period.	NP	NR
94	Clause 10(2)	Clause 4.1.1	If the licensee charges a fixed charge, the licensee must issue a bill for a fixed charge to each customer at least once in every 12-month period.	4	As there is no billing for the water services, this obligation is not rated.	NP	NR
95	Clause 11(2)	Clause 4.1.1	If the licensee charges a quantity charge, the licensee must issue a bill - for a quantity charge to each customer at least once in every 4-month period.	4	As per obligation 94.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
96	Clause 11(3)	Clause 4.1.1	A bill for usage must be based on a meter reading to ascertain the quantity supplied or discharged.	4	As per obligation 94.	NP	NR
98	Clause 11(4)	Clause 4.1.1	If an accurate meter reading is not possible and there are no applicable regulations, a bill for usage must be based on a reasonable estimate of supply or discharge using one of the prescribed methods.	4	As per obligation 94.	NP	NR
98A	Clause 11(5)	Clause 4.1.1	Despite subclauses 11(4) and (5), a bill for usage based on a meter reading must be issued at least once in every 12-month period.	4	As per obligation 94.	NP	NR
99	Clause 11(6)	Clause 4.1.1	The licensee must send a bill to the address of the place where the water service is provided or, if the customer nominates another address, to the nominated address.	4	As per obligation 94.	NP	NR
100	Clause 12	Clause 4.1.1	Each bill must contain the prescribed information.	4	As per obligation 94.	NP	NR
100A	Clause 13(1)	Clause 4.1.1	A bill issued for 2 or more water services must specify the charge payable for each water service.	4	As per obligation 94.	NP	NR
101	Clause 13(3)	Clause 4.1.1	Each bill for usage for a metered water service must contain the specified information.	4	As per obligation 94.	NP	NR
101A	Clause 13(4)	Clause 4.1.1	If a bill for usage for a metered water service was based on an estimate, the bill must inform the customer that the	4	As per obligation 94.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			licensee will tell the customer the prescribed information on request.				
102A	Clause 13(6)	Clause 4.1.1	Each bill must contain the prescribed information.	4	As per obligation 94.	NP	NR
103	Clause 14(1)	Clause 4.1.1	If a bill is based on an estimate, the licensee must tell the customer on request the basis of the estimate and the reason for the estimate.	4	As per obligation 94.	NP	NR
104	Clause 14(2)	Clause 4.1.1	If a bill is based on an estimate, the licensee must make any adjustments to the next bill to take into account the extent to which the estimate was not reasonable having regard to a subsequent and accurate meter reading.	4	As per obligation 94.	NP	NR
104A	Clause 15(3)	Clause 4.1.1	Each bill for usage to which clause 15 applies must, in addition to the requirements of clause 13, contain the prescribed information. (I.e., discount for leaks)	4	As per obligation 94.	NP	NR
105	Clause 16(1)	Clause 4.1.1	The licensee must provide to the customer on request a meter reading and a bill (or revised bill if applicable) for outstanding charges outside of the usual bill cycle, or in case the customer disputes an estimate.	4	As per obligation 94.	NP	NR
106	Clause 17(2) and (3)	Clause 4.1.1	The licensee must have a written policy, standard or set of guidelines (available on the licensee's website and a hardcopy provided to a customer upon request at no charge) in relation to	4	As per obligation 94.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			granting a discount to a customer whose meter reading indicates a water usage that is higher than normal for the customer but is likely to have been wasted because of a leak from the customer's system.				
107	Clause 18(2)	Clause 4.1.1	The licensee cannot recover an undercharged amount from a customer unless it is for water services provided in the 12-month period ending on the day on which the licensee informed the customer of the undercharging.	4	As per obligation 94.	NP	NR
108	Clause 18(3)	Clause 4.1.1	An undercharged amount must be the subject of, and explained in, a special bill or a separate item in the next bill.	4	As per obligation 94.	NP	NR
109	Clause 18(4)	Clause 4.1.1	The licensee must not charge interest or late payment fees on an undercharged amount.	4	As per obligation 94.	NP	NR
110	Clause 18(5)	Clause 4.1.1	The licensee must allow a customer to pay an undercharged amount by way of a repayment plan that has effect for the duration of the shorter of the prescribed periods starting on the day that the bill in clause 18(3) is issued.	4	As per obligation 94.	NP	NR
111A	Clause 19(2)	Clause 4.1.1	The licensee must, within 15 business days of becoming aware of an overcharge, credit the overcharged amount to the customer's account or send the customer a notice informing the customer of the overcharging and recommending options for how the	4	As per obligation 94.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			overcharged amount may be refunded or credited to the customer's account.				
112A	Clause 19(3)	Clause 4.1.1	If the licensee sends the customer an overcharging notice and receives instructions from the customer about the refunding or crediting of the overcharged amount, the licensee must refund the overcharged amount, or credit the overcharged amount to the customer's account within 15 business days of the licensee receiving the instructions.	4	As per obligation 94.	NP	NR
112B	Clause 19(4)	Clause 4.1.1	If instructions from the customer about the refunding or crediting of the overcharged amount have not been received by the licensee at the end of the period of 10 business days starting on the day an overcharging notice is sent, the licensee must credit the overcharged amount to the customer's account before the end of the period of the next 15 business days.	4	As per obligation 94.	NP	NR
112C	Clause 19(5)	Clause 4.1.1	The licensee must notify the customer immediately after crediting the overcharged amount to the customer's account under subclause (2)(a), (3) or (4).	4	As per obligation 94.	NP	NR
113	Clause 20(1)	Clause 4.1.1	The licensee must review a bill on the customer's request.	4	As per obligation 94.	NP	NR
114	Clause 20(2)	Clause 4.1.1	The license must have a written procedure for the review of a bill on the customer's request.	4	As per obligation 94.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
115	Clause 20(3) and (6)	Clause 4.1.1	The review procedure in clause 20(2) must include the specified information and be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	As per obligation 94.	NP	NR
116	Clause 20(4)	Clause 4.1.1	The review procedure must state that the customer may, but does not have to, use the licensee's complaints procedure mentioned in clause 46 before or instead of applying to the water services ombudsman or, if available, making an appeal from, or applying for a review of, the decision under regulations mentioned in section 222(2)(k) of the Act.	4	As per obligation 94.	NP	NR
117	Clause 20(5)	Clause 4.1.1	The licensee must inform the customer of the outcome of a review of the customer's bill as soon as practicable or otherwise less than 15 business days from the day the customer's request for review was received.	4	As per obligation 94.	NP	NR
117A	Clause 21	Clause 4.1.1	The licensee must notify each of its customers of any change to the amount or rate of a water service charge in accordance with the requirements in clause 21(2).	4	As per obligation 94.	NP	NR
118	Clause 23	Clause 4.1.1	The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued.	4	As per obligation 94.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
119	Clause 24(1)	Clause 4.1.1	The licensee must allow a customer to pay a bill using any of the prescribed methods selected by the customer.	4	As per obligation 94.	NP	NR
120	Clause 24(2)	Clause 4.1.1	The licensee must, when offering bill payment method options, inform the customer of the fees and charges (if any) associated with each bill payment method offered.	4	As per obligation 94.	NP	NR
121	Clause 25(1)	Clause 4.1.1	Before receiving a bill payment by direct debit, the licensee must obtain the express consent of the customer or of an adult person nominated by the customer to give consent.	4	As per obligation 94.	NP	NR
122	Clause 26(1)	Clause 4.1.1	The licensee must accept payment in advance from a customer on a customer's request.	4	As per obligation 94.	NP	NR
123	Clause 27	Clause 4.1.1	The licensee must on request and at no charge redirect a customer's bills because of the customer's absence or illness.	4	As per obligation 94.	NP	NR
124A	Clause 28(2)	Clause 4.1.1	The licensee must advise a customer who has been assessed as experiencing payment difficulties that they have a right to pay the bill under a payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer.	4	As per obligation 94.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
124B	Clause 28(3)	Clause 4.1.1	When formulating a payment plan or other arrangement for a customer that the licensee has assessed as experiencing payment difficulties, the licensee must take the customer's capacity to pay the bill into account. In the case of a bill for usage, the licensee must also take into account how much water has been supplied or wastewater has been discharged in previous billing periods.	4	As per obligation 94.	NP	NR
124C	Clause 28(4)	Clause 4.1.1	The licensee must consider and decide whether or not the payment plan or other arrangement for a customer who has been assessed as experiencing payment difficulties should be interest-free, or fee-free, or both.	4	As per obligation 94.	NP	NR
125	Clause 29(1) and (2)	Clause 4.1.1 and Schedule 3, clause 1.1.1	The licensee must have a written policy in relation to financial hardship that is approved by the ERA.	4	As there is no billing of customers for water services, NiW does not have a Financial Hardship Policy. Therefore, this is not rated.	NP	NR
126A	Clause 29(3)	Clause 4.1.1	Unless the ERA approves otherwise, the licensee's financial hardship policy must comply with the ERA's guidelines (if any) in relation to financial hardship policies.	4	As per obligation 125.	NP	NR
126B	Clause 29(4)	Clause 4.1.1	Unless the ERA approves otherwise, amendments to the licensee's financial hardship policy must be approved by the ERA and comply with the ERA's guidelines (if any) in relation to financial hardship policies.	4	As per obligation 125.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
127	Clause 29(5)	Clause 4.1.1	The licensee's financial hardship policy must be in effect within 6 months of the day of the grant of the license.	4	As per obligation 125.	NP	NR
128	Clause 29(6)	Clause 4.1.1	The licensee's financial hardship policy must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	As per obligation 125.	NP	NR
129A	Clause 29(7)	Clause 4.1.1	The licensee must review its financial hardship policy at least once in every 5 year period.	4	As per obligation 125.	NP	NR
129B	Clause 29(8)	Clause 4.1.1	The licensee must review its financial hardship policy if directed to do so by the ERA.	4	As per obligation 125.	NP	NR
129C	Clause 29(9)	Clause 4.1.1	The licensee must consult with relevant consumer organisations when formulating or reviewing its financial hardship policy.	4	As per obligation 125.	NP	NR
130A	Clause 30(2)	Clause 4.1.1	The licensee must advise a customer who has been assessed as experiencing financial hardship that they have a right to pay the bill under an interest-free and fee-free payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer.	4	As there is no billing for the water services, this obligation is not rated.	NP	NR
130B	Clause 30(3)	Clause 4.1.1	When formulating a payment plan or other arrangement for a customer that the licensee has assessed as	4	As per obligation 130A.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			experiencing financial hardship, the licensee must take the customer's capacity to pay the bill into account. In the case of a bill for usage, the licensee must also take into account how much water has been supplied or wastewater has been discharged in previous billing periods.				
131A	Clause 30(4)(a)	Clause 4.1.1	The licensee must consider reducing the amount owing by the customer.	4	As per obligation 130A.	NP	NR
131B	Clause 30(4)(b)	Clause 4.1.1	The licensee must review, upon request, how a customer is paying a bill under clause 30(2) and (3) and revise the payment plan or arrangement if the review indicates the customer is unable to meet the obligations.	4	As per obligation 130A.	NP	NR
131C	Clause 30(4)(c)	Clause 4.1.1	The licensee must provide the specified written information to a customer.	4	As per obligation 130A.	NP	NR
133	Clause 31(4) and (5)	Clause 4.1.1	The licensee must have written information regarding the payment schemes and other assistance that is available to customers. The information must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	As per obligation 130A.	NP	NR
133A	Clause 32	Clause 4.1.1	The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances.	4	As per obligation 130A.	NP	NR
134	Clause 33(1)(a)-(c)	Clause 4.1.1	The licensee must not commence or continue proceedings to recover a debt	4	As per obligation 130A.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			from a customer if the customer is complying with a payment plan or other arrangement, is being assessed for payment difficulties or is being assessed for financial hardship.				
134A	Clause 33(1)(d)-(e)	Clause 4.1.1	The licensee must not commence or continue proceedings to recover a debt from a customer if a complaint made by the customer to the licensee or water services ombudsman, which directly relates to the water service charge to which the debt relates, is not resolved by the licensee (or is not determined or is upheld by the ombudsman).	4	As per obligation 130A.	NP	NR
135	Clause 40(1)	Clause 4.1.1	If the licensee has cut off or reduced the rate of flow of water to land under section 95(1)(b) of the Act, the licensee must restore the supply of water if the amount owing is paid, or if the customer enters into a payment arrangement for the amount owing that is satisfactory to the licensee.	4	As per obligation 130A.	NP	NR
136	Clause 40(2)	Clause 4.1.1	If the licensee has, under section 95(1)(a), (c), (d) or (e) of the Act, cut off or reduced the flow of water, the licensee must restore the supply of water if the licensee is satisfied that the reason for the disconnection or reduction no longer applies.	4	As per obligation 130A.	NP	NR
137A	Clause 36(1)	Clause 4.1.1	The licensee must not start a water supply restriction unless the licensee has given the customer a reminder	4	As per obligation 130A.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			notice (that includes the information specified in clause 35), the water service charge has still not been paid in full, and the licensee has given the customer a restriction notice.				
137B	Clause 36(2)	Clause 4.1.1	The licensee must not give a customer a restriction notice less than 7 days before the day on which the water supply restriction is proposed to start.	4	As per obligation 130A.	NP	NR
137C	Clause 36(3)	Clause 4.1.1	The restriction notice must include the specified information.	4	As per obligation 130A.	NP	NR
138	Clause 37(1)(a)-(e) and (h)	Clause 4.1.1	The licensee must not start a water supply restriction if the specified circumstances apply.	4	As per obligation 130A.	NP	NR
138A	Clause 37(1)(f)-(g)	Clause 4.1.1	The licensee must not start a water supply restriction if the specified circumstances apply.	4	As per obligation 130A.	NP	NR
138B	Clause 38	Clause 4.1.1	The licensee must not start a water supply restriction on or during the specified times.	4	As per obligation 130A.	NP	NR
139	Clause 39	Clause 4.1.1	The licensee must not, under section 95(1)(b) or (2) of the Act, reduce the rate of flow of water to a customer to below 2.3 litres each minute.	4	As per obligation 130A.	NP	NR
142	Clause 41(4)	Clause 4.1.1	The licensee (other than the Water Corporation) must restore a water supply to land within the specified timeframe, unless the licensee and customer expressly agree otherwise.	4	As per obligation 130A.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
144	Clause 41(6)	Clause 4.1.1	The licensee (other than the Water Corporation) must ensure that there is a 90% compliance rate with clause 41(4) in any 12-month period ending on 30 June.	4	As per obligation 130A.	NP	NR
144A	Clause 43(1)	Clause 4.1.1	The licensee must give notice of any planned service interruption to each customer that will be affected by the service interruption.	4	The auditor confirmed with the Manager HSE and the onsite interviews that at least 3 days' notice is given for any planned interruptions to water services. This obligation is stated in the Customer Charter.	A	1
144B	Clause 43(2)	Clause 4.1.1	The notice of any planned service interruption must be given within the prescribed timeframes.	4	As per obligation 144A.	A	1
144C	Clause 44(1)	Clause 4.1.1	The licensee must have policies, practices and procedures for dealing with and minimising the impact of a burst, leak or blockage in its water supply works or sewerage works.	4	The auditor sighted the Leinster Drinking Water Response Plan that includes detailed procedures for drinking water incidents. There is also the Leinster Township Emergency Management document covering any general incidents affecting town services.	A	1
144D	Clause 44(2)	Clause 4.1.1	The policies, practices and procedures under clause 44(1) must deal with the prescribed matters.	4	The procedures noted in obligation 144C deal with the prescribed matters.	A	1
144E	Clause 45	Clause 4.1.1	The licensee must provide a 24 hour information line by means of which, at the cost of a local telephone call (excluding mobile telephones), a customer can notify the licensee of emergencies and faults, and get information about the reason for, and the		The auditor confirmed that a 24 hour information line is available with the contact details in the Customer Charter.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			expected duration of, any unplanned service interruption.				
145	Clause 46(1)	Clause 4.1.1	The licensee must have a written complaints procedure in relation to investigating and dealing with complaints of customers about the provision of water services by the licensee or a failure by the licensee to provide a water service.	4	The auditor sighted the complaints procedure in the Customer Charter – Leinster Drinking Water and Wastewater Services. The NiW's Managing Customer Feedback at Leinster Procedure that captures complaints handling processes that meets the minimum requirements of the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i> and enables the reporting of the number, and type, of customer complaints received during a reporting year.	A	1
146	Clause 46(2)	Clause 4.1.1	The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's guidelines (if any).	4	The complaints procedure is compliant with the relevant provisions of AS ISO 10002-2014 and the ERA's Customer Complaints Guidelines dated December 2016.	A	1
147	Clause 46(3)	Clause 4.1.1	The licensee's complaints procedure must provide for the matters specified in relation to lodgment of complaints, responding to complaints, dispute resolution arrangements and resolving complaints.	4	The audit reviewed the Customer Charter – Leinster Drinking Water and Wastewater Services and confirmed the complaints procedure includes how complaints are to be lodged and responded to.	A	1
148A	Clause 46(4)	Clause 4.1.1	The licensee's complaints procedure must list the procedures available to the customer under the Act as to applying to the water services ombudsman or making an appeal from, or applying for a review of, the decision that gave rise to the complaint, if an appeal or review is	4	The complaints procedure in the Customer Charter – Leinster Drinking Water and Wastewater Services does not include any reference to requesting a review of any decision or the option to refer the complaint to the Energy and Water Ombudsman. Recommendation 1/2022 a) <i>The complaints procedure in the Customer Charter - Leinster Drinking Water and</i>	C	2

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			available under regulations mentioned in section 222(2)(k).		<i>Wastewater Services should be updated to include reference to applying to the Energy and Water Ombudsman (EWO) or making an appeal from, or applying for a review of, the decision that gave rise to the complaint. This should include providing a Freecall telephone number for the EWO.</i>		
149	Clause 46(5)	Clause 4.1.1	The licensee's complaints procedure must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	<p>The auditor confirmed with Manager – HSE that a hardcopy of the Customer Charter is available upon request and at no charge. However, the Customer Charter and the Managing Customer Feedback at Leinster Procedure could not be located on the BHP Nickel West website.</p> <p>Recommendation 1/2022</p> <p>b) <i>The Customer Charter - - Leinster Drinking Water and Wastewater Services and the Managing Customer Feedback at Leinster Procedure should be available on the BHP Nickel West Leinster website.</i></p>	C	2
149A	Clause 47	Clause 4.1.1	When the licensee considers that a customer's complaint has been resolved the licensee must advise the customer accordingly, inform the customer that the customer has a right to apply to the water services ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman.	4	<p>The Manager – HSE advised that no complaints were received in the audit period.</p> <p>The complaints procedure in the Customer Charter – Leinster Drinking Water and Wastewater Services does not include any reference to requesting a review of any decision or the option to refer the complaint to the Energy and Water Ombudsman.</p> <p>Refer Recommendation 1/2022.</p>	C	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
150	Clause 48(1)	Clause 4.1.1	The licensee must provide a customer with the specified services on request and at no charge. <i>i.e.</i> a) <i>services for account, payment and general enquiries for use by customers with hearing or speech impaired.</i> b) <i>interpreter services for account, payment and general enquiries.</i> c) <i>a large-print version of any of the licensee's publicly available documents.</i>	4	The auditor confirmed with the Manager HSE that the information is available in the above formats upon request and that during the audit period, no such requests have been received. The information is not available in the Customer Charter and this is not on the website. Recommendation 1/2022 c) <i>As required by the Code of Conduct (Customer Service Standards) 2018, the Customer Charter - Leinster Drinking Water and Wastewater Services should be updated to include the following:</i> <ul style="list-style-type: none"><i>services for general enquiries for use by customers with hearing or speech impaired.</i><i>interpreter services for general enquiries.</i><i>a large-print version of any of the licensee's publicly available documents.</i>	C	NR
152	Clause 48(2)	Clause 4.1.1	The licensee must make available to each customer, at no charge, the customer's personal account information including information about bills previously issued to the customer and about the quantity of water supplied to, or wastewater discharged by, the customer in previous billing periods.	4	As there is no metering or billing of water services to customers in the audit period, this obligation is not rated.	NP	NR
153	Clause 49(1)	Clause 4.1.1	The licensee must make the prescribed information publicly available.	4	As there is no connection or billing of water services, this information is not required. Other "prescribed information" is available in the Customer Charter with the exception of the information noted in obligations	C	2

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					148A, 149A and 150 above. The Charter is also not publicly available as noted in obligation 149 above. Refer recommendations 1/2022 and 2/2022.		
154	Clause 49(2)	Clause 4.1.1	The licensee must ensure that the specified information about bills may be obtained from its website.	4	As there is no billing for water services, this obligation is not rated.	NP	NR
154A	Clause 49(3)	Clause 4.1.1	The licensee must ensure that its website contains a link to the current version of this code appearing on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation.	4	There is no link on the BHP Nickel West Leinster website to the current version of the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i> on the WA legislation site. Recommendation 2/2022 <i>The BHP Nickel West Leinster website should include a link to the Water Services Code of Conduct (Customer Service Standards) 2018 on the WA government legislation site.</i>	C	2
154B	Clause 51(1) and (3)	Clause 4.1.1	The licensee must maintain an up-to-date preserved supply register for the purposes of Part 9 of the Code if the <i>licensee meets the criteria in clause 51(2)</i> . The register must record the prescribed information <i>in clause 51(3) if the criteria in clause 51(2) applies to the licensee.</i> <i>Note: Changes in Italics were made to the obligation in May 2020.</i>	2	The Manager HSE and onsite interviews confirmed there were no disconnections of any water supply to residences during the audit period. The auditor was unable to sight a Preserved Supply Register. Recommendation 3/2022 <i>As required by the Code of Conduct (Customer Service Standards) 2018, a Preserved Supply Register should be maintained by NiW and this should be referenced in the Leinster Drinking Water Supply Operations and Maintenance Manual and the Leinster Drinking Water Incident Response Plan.</i>	C	2

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
154C	Clause 52	Clause 4.1.1	The licensee must not, under section 95(1)(b) of the Act, reduce the rate of flow of a supply of water to a supply address recorded on the preserved supply register. * *Potable water only.	2	The Manager HSE and onsite interviews confirmed there were no reduced flow of any water supply to residences during the audit period. However, the auditor was unable to sight a Preserved Supply Register. Refer recommendation 3/2022.	C	NR
154D	Clause 53	Clause 4.1.1	Despite clause 43(3), in the case of a service interruption that will affect a supply address recorded on the preserved supply register, the notice required by clause 43(1) must be sent by post or delivered to that supply address.	2	As per obligation 154C.	C	NR
Other Licence conditions							
155	Water Services Act Section 12	Clause 4.2.1	The licensee must pay the applicable fees and charges in accordance with the Economic Regulation Authority (Licensing Funding) Regulation 2014.	4	The fee for 2021/22 due by 30 September 2022 was not paid until December 2022. As the payment was overdue, this is considered a non-compliance with minor impact and did not affect customers. Recommendation 4/2022 <i>The payment of any licencing fees due to the ERA should be included in a compliance calendar to ensure payments are made by the due date.</i>	C	2
160	Water Services Act Section 12	Clause 4.6.1	The licensee and any related body corporate must maintain accounting records that comply with standards issued by the Australian Accounting Standards Board or equivalent International Accounting Standards.	4	The auditor reviewed BHP's Financial Statements for 2020/21 and 2021/22 audited by external accountants that confirmed the accounting records comply with accounting standards.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
161	Water Services Act Section 12	Clause 5.2.1	The licensee must comply with any individual performance standards prescribed by the ERA.	4	From review of the Performance Report to the ERA for 2020/21 and 2021/22, the auditor confirmed the water flow rate and pressure meet the performance standards in Schedule 2 of the licence. The required performance standards are documented in the Drinking Water AMP .	A	1
162	Water Services Act Section 12	Clause 5.3.4	The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the operational audit.	4	This audit/review is designed in accordance with the Audit Guidelines. The licensee has fully co-operated with this audit. This obligation is stated in the Drinking Water AMP and Sewerage AMP (section 9).	A	1
163	Water Services Act Section 12	Clause 4.7.1(a), (b), (c)	The licensee must report to the ERA, in the manner prescribed, if a licensee is under external administration or there is a change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations.	4	The auditor confirmed by interview and review of BHP's Financial Reports for the audit period that it was not under external administration during the audit period.	NP	NR
165	Water Services Act Section 12	Clause 4.8.1	The licensee must provide the ERA specified information relevant to the operation of the licence or the licensing scheme, or the performance of the ERA's function under the Act in the manner and form specified by the ERA.	4	In accordance with the Water Compliance Reporting Manual 2021 and previous versions, NiW is required to submit to the ERA: <ul style="list-style-type: none"> Annual performance reports no later than 31 August for the reporting year ending 30 June; and Annual compliance reports by 31 August for the year ending 30 June. The auditor reviewed NiW's correspondence with the ERA and the Compliance and Performance Reports for 2020/21 and 2021/22 confirmed the reports had been submitted by the due dates.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					This obligation is documented in the Water Services Licence Audits and Reporting Requirements (NLN-HSEC-PRO-0222).		
167	Water Services Act Section 12	Clause 4.8.2	The licensee must provide the ERA with the data required for performance reporting purposes that is specified in the Water, Sewerage and Irrigation Licence Performance Reporting Handbook, and the National Performance Framework that apply to the licensee.	4	<p>The auditor reviewed NiW's correspondence with the ERA and the Performance Reports for 2020/21 and 2021/22 and confirmed the reports had been submitted with the required data. The Performance Report for 2021/22 was submitted in October 2022 after the due date of 31 August 2022.</p> <p>There were also some errors identified in the 2020/21 performance data after the ERA requested review of the variances between the 2020/21 and 2021/22 Performance Reports.</p> <p>NiW has confirmed the procedures for the performance reporting and data have been improved in December 2022.</p>	B	2
168	Water Services Act Section 12	Clause 3.8.1 and 3.8.2	Subject to clause 3.8.3, the licensee must publish within the specified timeframe any information that the ERA has directed the licensee to publish under clause 3.8.1.	4	The auditor confirmed with Manager HSE that there were no directions from the ERA to publish information.	NP	NR
169	Water Services Act Section 12	Clause 3.7.1	Unless otherwise specified, all notices must be in writing.	4	The auditor reviewed NiW's correspondence with the ERA in the audit period and confirmed compliance. All correspondence observed was in hardcopy letter or email.	NP	1
170A	Water Services Act Section 12 (Applicable from May 2020)	Clause 5.1.1(a) and (b)	<p>The licensee must notify the ERA of the details of the asset management system within five business days from the later of:</p> <p>a) the commencement date; or</p> <p>b) the completion of construction of the licensee's water service works.</p>	4	The ERA has been notified of and has approved the asset management system as part of the licence application and approval.	NP	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
171	Water Services Act Section 12	Clause 5.1.3	The licensee must notify the ERA of any material change to the asset management system within 10 business days of the change.	4	The auditor confirmed with Manager HSE and field observations that no changes have been made to the Asset Management System (AMS) during the audit period. NiW maintains a legal register which contains all relevant legislation that is applicable to its operations. The HSEC Licences and Approvals procedure includes the requirement to notify the ERA of any material change to the AMS within 10 days.	A	NR
172	Water Services Act Section 12	Clause 5.1.7	The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the asset management system review.	4	This review is being undertaken in accordance with the Audit and Review Guidelines. The licensee has fully co-operated with this asset management review. This obligation is stated in the Drinking Water AMP and Sewerage AMP (section 9).	A	1
172A	Water Services Act Section 12	Clause 6.1.1	If the ERA considers that one or more of a licensee's standard terms and conditions of service is no longer in the public interest, the ERA may direct the licensee: a) to amend: i. the standard term or condition of service; or ii. the standard term or condition of service in accordance with a term proposed by the ERA; and b) to do so within a specified period.	4	Manager HSE confirmed there has been no directives from the ERA.	NP	NR
172B	Water Services Act Section 12	Clause 6.1.2	The licensee must comply with a direction given to the licensee under clause 6.1.1.	4	Manager HSE confirmed there has been no directives from the ERA.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
181	<i>Water Services Act</i> Section 12	Clause 6.3.1	If the licensee is appointed as the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of a supplier of last resort, comply with the duties imposed by the Act and carry out its operations under or for the purpose of the last resort plan in accordance with the Act.	4	The auditor confirmed with Manager HSE that NiW was not appointed as a supplier of last resort.	NP	NR
182	<i>Water Services Act</i> Section 12	Clause 4.4.1(b)	If the licensee provides a water service outside of the operating area the licensee must apply to amend the licence unless otherwise notified by the ERA.	4	The Manager – HSE and the site visit confirmed there have been no water services provided outside of the operating area stated in the licence. This is also stated in the Drinking Water AMP and Sewerage AMP.	A	NR
184	<i>Water Services Act</i> Section 12	Clause 7.1.1	Where the licensee provides potable water, the licensee must enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health.	4	The Lead Project Engineer – NOR advised that the Memorandum of Understanding (MOU) between the Department of Health and BHP NiW for Drinking Water is being developed and is approximately 80% complete. The draft has been provided to the DoH. The MOU outlines the management of drinking water quality, audit of water supply systems, publication and exchange of information and data and managing events of public health significance. The Leinster Drinking Water Incident Response Plan includes Department of Health liaison and reporting. Quarterly Potable Water Reports have been provided to the DoH each quarter from June 2021 to June 2022 and have been published on the BHP NiW website. As it has been 2 years since the licence was approved, the MoU should be finalised.	C	2

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					Recommendation 5/2022 <i>The draft Memorandum of Understanding between the Department of Health and NiW for drinking water should be finalised as soon as possible.</i>		
184A	Water Services Act Section 12	Clause 7.1.2	Where the licensee provides sewerage services, the licensee must enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health.	4	As confirmed by the ERA and review of the licence, the licence does not require a separate MoU for sewerage services. Therefore, this obligation is not rated.	NP	NR
184B	Water Services Act Section 12	Clause 7.1.3	If the licensee provides both potable water and sewerage services, the licensee must enter into a separate Memorandum of Understanding with the Department of Health in respect of each of the potable water service and sewerage service.	4	As confirmed by the ERA and review of the licence, the licence does not require a separate MoU for sewerage services. Therefore, this obligation is not rated.	NP	NR
185	Water Services Act Section 12	Clause 7.1.4	A Memorandum of Understanding must comply with the specified requirements in relation to legal standing of the document and compliance audits by the Department of Health.	4	As the MoU with the Department of Health has not been finalised, this obligation is not rated.	NP	NR
186	Water Services Act Section 12	Clause 7.1.5	The licensee must comply with the terms of a Memorandum of Understanding.	4	As the MoU with the Department of Health has not been finalised, this obligation is not rated.	NP	NR
187	Water Services Act Section 12	Clause 7.1.6	The licensee must publish in the form agreed with the Department of Health, a Memorandum of Understanding and any amendments to a Memorandum of	4	As the MoU with the Department of Health has not been finalised, this obligation is not rated.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			Understanding within one month of signing or making the amendment. (Potable water and sewerage services).				
188	Water Services Act Section 12	Clause 7.1.7	The licensee must publish the audit report on compliance with its obligations under a Memorandum of Understanding on its website within one month of the completion of the audit or a frequency specified by the Department of Health.	4	As the MoU with the Department of Health has not been finalised, this obligation is not rated.	NP	NR
189	Water Services Act Section 12	Clause 7.1.8	The licensee must publish, in a form agreed with the Department of Health, any other reports required by the Department of Health or required by a Memorandum of Understanding on the licensee's website, at a reporting frequency specified by the Department of Health.	4	The auditor confirmed that Quarterly Potable Water Reports from June 2021 to June 2022 have been published on the BHP NiW website.	NP	1
190	Water Services Act Section 12	Schedule 2	The licensee must comply with the standards set out in Schedule 2 of the licence.	4	From review of the Performance Reports to the ERA for 2020/21 and 2021/22, and by onsite interviews, the audit confirmed the water flow/pressure is being complied with. The required performance standards are documented in the AMP – Water.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
Water Services Code of Practice (Family Violence) 2020⁷. (applicable from March 2021)							
191	Clause 5(1)	Clause 4.1.1	The Licensee must have a family violence policy that sets out the matters specified in clause 5(1).	4	The auditor was advised that NiW has not yet developed a Family Violence Policy that sets out the matters specified in Clause 5(1). The matters specified in the Code relate to account, payment difficulties, financial hardship, debt management and external support services. Although NiW does not bill customers for water services and there are no restrictions or disconnections of water supplies as all properties are leased by NiW to customers, the Policy is still required to provide information about external support services available to the customer. Recommendation 6/2022 <i>NiW should develop a Family Violence Policy, publish it on the website and provide a hardcopy to customers upon request and at no charge.</i>	C	2
192	Clause 5(2)	Clause 4.1.1	The licensee must have a family violence policy before the end of the six- month period starting on either: 9 December 2020; or if the day of the grant of the licensee's licence is after 9 December 2020, the day of the grant of the licensee's licence.	4	Refer obligation 191.	C	2
193	Clause 6	Clause 4.1.1	A licensee must publish its family violence policy on its website and provide a hard copy of the policy to a customer on request and at no charge.	4	Refer obligation 191.	C	2

⁷ This Water Services Code of Practice (Family Violence) 2020 applies the Code to a licensee that provides a water service to a residential customer. A "residential customer" in the Code means a customer who uses the place where a water service is provided, solely or primarily as the customer's dwelling

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
194	Clause 7	Clause 4.1.1	A licensee must review its family violence policy at least once in every 5 year period, and additionally, if directed to do so by the Minister.	4	As the policy has not yet been developed, a review is not required.	NP	NR
195	Clause 8(1)	Clause 4.1.1	A licensee must maintain adequate records in relation to compliance with this code or any policy made under the code.	4	As the policy has not yet been developed, this obligation is not rated.	NP	NR
196	Clause 8(2)	Clause 4.1.1	If the licensee is not a government organisation according to the <i>State Records Act 2000 (WA)</i> , a record that relates to a customer, must be retained for at least 7 years after the last communication between the licensee and the customer, or water services ombudsman. If the record does not relate to a customer, then the record must be kept for at least 7 years after the record is made.	4	As the policy has not yet been developed, this obligation is not rated.	NP	NR
197	Clause 9 (Clause 4.1.1	When a customer affected by family violence first contacts a licensee about a particular matter relating to the family violence, the licensee must inform the customer of the existence and operation of the licensee's complaints procedure under clause 46 of the Water Services Code of Conduct (Customer Service Standards) 2018.	4	The licensee confirmed there has been no contact from customers affected by family violence.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
198	Clause 10	Clause 4.1.1	A licensee must ensure that its website contains a link that provides access to the current version of the code as it appears on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation.	4	<p>The NiW website does not have a link to the current version on the Water Services Code of Practice (Family Violence Policy) 2020.</p> <p>Recommendation 7/2022</p> <p><i>NiW should publish a link on the NiW website to the current version of the Water Services Code of Practice (Family Violence) 2020 on the WA government legislation website.</i></p>	C	2

3.6 Audit Recommendations

Table of Current Audit Non- Compliances and Recommendations

A. Resolved during current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Licence obligation ref. and obligation/ Rating/ Non-compliance or inadequacy of control)	Date Resolved (& management action taken)	Auditor's Comments
	Nil		
B. Unresolved at end of current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
1/2022	<p>Customer Charter and Complaints Procedure</p> <p>Rating: C2</p> <p><i>Obligation 148A - The licensee's complaints procedure must list the procedures available to the customer under the Act as to applying to the water services ombudsman or making an appeal from, or applying for a review of, the decision that gave rise to the complaint, if an appeal or review is available under regulations mentioned in section 222(2)(k).</i></p> <p>The complaints procedure in the Customer Charter – Leinster Drinking Water and Wastewater Services does not include any reference to requesting a review of any decision or the option to refer the complaint to the Energy and Water Ombudsman.</p> <p>Rating: C2</p> <p><i>Obligation 149 - The licensee's complaints procedure must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.</i></p>	<p>a) The complaints procedure in the Customer Charter - Leinster Drinking Water and Wastewater Services should be updated to include reference to applying to the Energy and Water Ombudsman (EWO) or making an appeal from, or applying for a review of, the decision that gave rise to the complaint. This should include providing a Freecall telephone number for the EWO.</p> <p>b) The Customer Charter - - Leinster Drinking Water and Wastewater Services and the Managing Customer Feedback at Leinster Procedure should be available on the BHP Nickel West Leinster website.</p>	No action to end of audit period.

B. Unresolved at end of current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
	<p>The auditor confirmed with Manager – HSE that a hardcopy of the Customer Charter is available upon request and at no charge. However, the Customer Charter and the Managing Customer Feedback at Leinster Procedure could not be located on the BHP Nickel West website.</p> <p>Rating: C/NR</p> <p><i>Obligation 149A - When the licensee considers that a customer's complaint has been resolved the licensee must advise the customer accordingly, inform the customer that the customer has a right to apply to the water services ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman.</i></p> <p>The Manager – HSE advised that no complaints were received in the audit period. However, the complaints procedure in the Customer Charter – Leinster Drinking Water and Wastewater Services does not include any reference to requesting a review of any decision or the option to refer the complaint to the Energy and Water Ombudsman.</p> <p>Rating: C/NR</p> <p><i>Obligation 150 - The licensee must provide a customer with the specified services on request and at no charge. i.e.</i></p> <p>a) <i>services for account, payment and general enquiries for use by customers with hearing or speech impaired.</i></p> <p>b) <i>interpreter services for account, payment and general enquiries.</i></p> <p>c) <i>a large-print version of any of the licensee's publicly available documents.</i></p> <p>The auditor confirmed with the Manager HSE that the information is available in the above formats upon request and that during the audit period, no such requests have been received.</p> <p>The information is not available in the Customer Charter and this is not on the website.</p>	<p>c) As required by the <i>Code of Conduct (Customer Service Standards) 2018</i>, the Customer Charter - Leinster Drinking Water and Wastewater Services should be updated to include the following:</p> <ul style="list-style-type: none"> • services for general enquiries for use by customers with hearing or speech impaired. • interpreter services for general enquiries. • a large-print version of any of the licensee's publicly available documents. 	

B. Unresolved at end of current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
	<p>Rating: C2</p> <p><i>Obligation 153 - The licensee must make the prescribed information publicly available.</i></p> <p>As there is no connection or billing of water services, this information is not required. Other “prescribed information” is available in the Customer Charter with the exception of the information noted in obligations 148A, 149A and 150 above. The Charter is also not publicly available as noted in obligation 149 above.</p>		
2/2022	<p>Website Link to Code of Conduct (Customer Service Standards)</p> <p>Rating: C2</p> <p><i>Obligation 154A - The licensee must ensure that its website contains a link to the current version of this code appearing on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation.</i></p> <p>There is no link on the BHP Nickel West Leinster website to the current version of the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i> on the WA legislation site.</p>	The BHP Nickel West Leinster website should include a link to the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i> on the WA government legislation site.	No action to end of audit period.
3/2022	<p>Preserved Supply Register</p> <p>Rating: C2</p> <p><i>Obligation 154B - The licensee must maintain an up-to-date preserved supply register for the purposes of Part 9 of the Code if the licensee meets the criteria in clause 51(2). The register must record the prescribed information in clause 51(3) if the criteria in clause 51(2) applies to the licensee.</i></p> <p>Rating: C/NR</p>	As required by the <i>Code of Conduct (Customer Service Standards) 2018</i> , a Preserved Supply Register should be maintained by NiW and this should be referenced in the Leinster Drinking Water Supply Operations and Maintenance Manual and the Leinster Drinking Water Incident Response Plan.	No action to end of audit period.

B. Unresolved at end of current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
	<p><i>Obligation 154C - The licensee must not, under section 95(1)(b) of the Act, reduce the rate of flow of a supply of water to a supply address recorded on the preserved supply register (Potable water only).</i></p> <p>Rating: C/NR</p> <p><i>Obligation 154D - Despite clause 43(3), in the case of a service interruption that will affect a supply address recorded on the preserved supply register, the notice required by clause 43(1) must be sent by post or delivered to that supply address.</i></p> <p>The Manager HSE and onsite interviews confirmed there were no reduced flow of any water supply to residences during the audit period. However, the auditor was unable to sight a Preserved Supply Register.</p>		
4/2022	<p>Payment of ERA Licence Fees</p> <p>Rating: C2</p> <p><i>Obligation 155 - The licensee must pay the applicable fees and charges in accordance with the Economic Regulation Authority (Licensing Funding) Regulation 2014.</i></p> <p>The fee for 2021/22 due by 30 September 2022 was not paid until December 2022. As the payment was overdue, this is considered a non-compliance with minor impact and did not affect customers.</p>	The payment of any licencing fees due to the ERA should be included in a compliance calendar to ensure payments are made by the due date.	No action to end of audit period.
5/2022	<p>Memoranda of Understanding with Department of Health</p> <p>Rating: C2</p> <p><i>Obligation 184 - Where the licensee provides potable water, the licensee must enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health.</i></p> <p>The Lead Project Engineer – NOR advised that the Memorandum of Understanding (MOU) between the Department of Health and BHP NiW</p>	The draft Memorandum of Understanding between the Department of Health and NiW for drinking water should be finalised as soon as possible.	No action to end of audit period.

B. Unresolved at end of current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
	<p>for Drinking Water is being developed and is approximately 80% complete. The draft has been provided to the DoH.</p> <p>The MOU outlines the management of drinking water quality, audit of water supply systems, publication and exchange of information and data and managing events of public health significance.</p> <p>The Leinster Drinking Water Incident Response Plan includes Department of Health liaison and reporting.</p> <p>Quarterly Potable Water Reports have been provided to the DoH each quarter from June 2021 to June 2022 and have been published on the BHP NiW website. As it has been 2 years since the licence was approved, the MoU should be finalised.</p>		
6/2022	<p>Family Violence Policy</p> <p>Rating: C2</p> <p><i>Obligation 191 - The Licensee must have a family violence policy that sets out the matters specified in clause 5(1).</i></p> <p>Rating: C2</p> <p><i>Obligation 192 - The licensee must have a family violence policy before the end of the six- month period starting on either: 9 December 2020; or if the day of the grant of the licensee's licence is after 9 December 2020, the day of the grant of the licensee's licence.</i></p> <p>Rating: C2</p> <p><i>Obligation 193 - A licensee must publish its family violence policy on its website and provide a hard copy of the policy to a customer on request and at no charge.</i></p> <p>The auditor was advised that NiW has not yet developed a Family Violence Policy that sets out the matters specified in Clause 5(1). The matters specified in the Code relate to account, payment difficulties, financial hardship and debt management. As NiW does not bill customers for water services, these matters would not arise. There are</p>	<p>NiW should develop a Family Violence Policy, publish it on the website and provide a hardcopy to customers upon request and at no charge.</p>	<p>No action to end of audit period.</p>

B. Unresolved at end of current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
	no restrictions or disconnections of water supplies as all properties are leased by NiW to customers. However, subject to further clarification with the ERA, this is considered a non-compliance with minor impact.		
7/2022	<p>Website Link to Water Services Code of Practice (Family Violence) Rating: C2</p> <p><i>Obligation 198 – A licensee must ensure that its website contains a link that provides access to the current version of the code as it appears on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation.</i></p> <p>The NiW website does not have a link to the current version on the <i>Water Services Code of Practice (Family Violence Policy) 2020</i>.</p>	NiW should publish a link on the NiW website to the current version of the <i>Water Services Code of Practice (Family Violence) 2020</i> on the WA government legislation website.	No action to end of audit period.

4. Asset Management System Review

4.1 Description of Infrastructure

BHP Nickel West Pty Ltd ('NiW') has a Water Services Licence, issued by the Economic Regulation Authority ('ERA') under the *Water Services Act 2012* ('Act'), for the provision of potable water supply and sewerage services in the mining town of Leinster.

Leinster is located in the northern Goldfields area of Western Australia, approximately 370 km north of Kalgoorlie on the Goldfields Highway and 650 kilometres northeast of Perth. Water supply and sewerage services to the Leinster Mine and Concentrator (Site) and the airport located 12 km and 8 km respectively to the north of town are not included in the licence.

NiW owns and operates all of the drinking water and sewerage infrastructure that services approximately 2,100 people in the township of Leinster. Leinster provides accommodation for employees and families of NiW, as well as contracting companies and government agencies that support the town. NiW has been operating and maintaining both systems at this site since 2005 and has implemented a number of upgrades and replacement of critical assets. All water services are provided to NiW employees, and others in the town without charge.

Raw water for the drinking water supply is abstracted from 16 dedicated production bores located at the 11 Mile Borefield. Raw water is pumped from the bores to the 11 Mile Site, where four raw water storage tanks are located. The 11 Mile tanks are maintained at 95% full and when they fall below this level, the bore pumps are activated (in priority order) to fill the tanks.

One 3 ML drinking water storage tank is located within the Town to supply the township and camp. The Town accounts for approximately 70% of the total drinking water. Free chlorine residual at the Town Tank is continuously monitored.

The Leinster township is serviced by a conventional sewerage system that is comprised of predominately vitreous clay gravity mains, sewage pumping stations and rising mains that pump to a receiving manhole. Sewage then flows by gravity to an Intermittently Decanted Extended Aeration Wastewater Treatment Plant (WWTP) located approximately 1.4 km northwest of the town centre. Effluent from the WWTP is then pumped to evaporation ponds located a further 1.5 km northwest from the WWTP.

4.2 Objectives and Scope

The objective of the review was to assess the adequacy and effectiveness of the asset management system in place for the undertaking, maintenance and monitoring of the licensee's assets.

The scope of the review included an assessment of the adequacy and effectiveness of the asset management system by evaluating the key processes of:

- Asset planning
- Asset creation/acquisition
- Asset disposal
- Environmental analysis
- Asset operations
- Asset maintenance
- Asset management information system
- Risk management
- Contingency planning
- Financial planning
- Capital expenditure planning
- Review of the asset management system.

The highest priority asset components based on inherent risk were:

- Asset planning (high inherent risk); and
- Environmental analysis (high inherent risk).

This review covers the period from commencement of the licence on 16 September 2020 to 30 September 2022.

4.3 Asset Management Process and Performance Rating Scales

The adequacy of process policy and definition and the performance of the key processes were assessed using the scales described in the tables below. The overall effectiveness rating for each asset management process is based on a combination of the process and policy adequacy rating and the performance rating.

Asset Management Process and Policy Definition - Adequacy ratings

RATING	DESCRIPTION	CRITERIA
A	Adequately defined	<ul style="list-style-type: none"> Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews and updated where necessary. The asset management information system(s) are adequate in relation to the assets that are being managed.
B	Requires some improvement	<ul style="list-style-type: none"> Process and policy documentation require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires significant improvement	<ul style="list-style-type: none"> Process and policies are incomplete or require substantial improvement. Processes and policies do not document the required performance of the assets. Processes and policies are considerably out of date. The asset management information system(s) requires substantial improvement (taking into consideration the assets being managed).
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

Asset Management Performance Ratings

RATING	DESCRIPTION	CRITERIA
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed, and corrective action taken where necessary.
2	Opportunity for improvement	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Process improvement opportunities are not implemented.
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires significant improvement to meet the required level. Process effectiveness reviews are performed irregularly, or not at all. Process improvement opportunities are not implemented.
4	Some action required	<ul style="list-style-type: none"> Process is not performed, or the performance is so poor that the process is considered to be ineffective.

4.4 Summary of Asset Management System Effectiveness Ratings

The review's assessment of the asset management system process and policy definitions and their effectiveness, based on the ratings scale in Section 4.3, is shown in the table below.

Section 4.5 provides further details of the current rating results for each process in the asset management system.

Summary of Asset Management Performance Ratings

Process and Policy Definition – Adequacy Rating	Performance Rating for Effectiveness Criteria					
	Rating	1 Performing effectively	2 Opportunity for improvement	3 Corrective action required	4 Some action required	Total
	A -Adequately defined	52	3	1	-	56
	B – Requires some improvement	2	-	-	-	2
	C – Requires significant improvement	-	-	-	-	-
	D – Inadequate	-	-	-	-	-
	Total	54	3	1	-	58

Asset Management System Performance Ratings

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
1. Asset planning	A					2			
1.1 Asset management plan covers the processes in this table.	✓				✓				
1.2 Planning process and objectives reflect the needs of all stakeholders and are integrated with business planning.	✓				✓				
1.3 Service levels are defined in the asset management plan.	✓					✓			
1.4 Non-asset options (e.g. demand management) are considered.	✓				✓				

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
1.5 Lifecycle costs of owning and operating assets are assessed.	✓				✓				
1.6 Funding options are evaluated.	✓				✓				
1.7 Costs are justified and cost drivers identified.	✓				✓				
1.8 Likelihood and consequences of asset failure are predicted.	✓					✓			
1.9 Asset management plan are regularly reviewed and updated.	✓					✓			
2. Asset creation/ acquisition	A				1				
2.1 Full project evaluations are undertaken for new assets, including comparative assessment of non-asset solutions.	✓				✓				
2.2 Evaluations include all life-cycle costs.	✓				✓				
2.3 Projects reflect sound engineering and business decisions.	✓				✓				
2.4 Commissioning tests are documented and completed.	✓				✓				
2.5 Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood.		✓			✓				
3. Asset disposal	A				1				
3.1 Under-utilised and under-performing assets are identified as part of a regular systematic review process.	✓				✓				
3.2 The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken.	✓				✓				
3.3 Disposal alternatives are evaluated.	✓				✓				
3.4 There is a replacement strategy for assets.	✓				✓				
4. Environmental analysis		B			1				

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
4.1 Opportunities and threats in the asset management system environment are assessed.	✓				✓				
4.2 Performance standards (availability of service, capacity, continuity, emergency response, etc) are measured and achieved.	✓				✓				
4.3 Compliance with statutory and regulatory requirements.		✓			✓				
4.4 Achievement of customer service levels.	✓				✓				
5. Asset operations	A				1				
5.1 Operational policies and procedures are documented and linked to service levels required.		✓			✓				
5.2 Risk management is applied to prioritise operations tasks.	✓				✓				
5.3 Assets are documented in an Asset Register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition.	✓				✓				
5.4 Accounting data is documented for assets.	✓				✓				
5.5 Operational costs are measured and monitored.	✓				✓				
5.6 Staff resources are adequate and staff receive training commensurate with their responsibilities.	✓				✓				
6. Asset maintenance	A				1				
6.1 Maintenance policies and procedures are documented and linked to service levels required.	✓				✓				
6.2 Regular inspections are undertaken of asset performance and condition.	✓				✓				
6.3 Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.	✓				✓				
6.4 Failures are analysed and operational/maintenance plans adjusted where necessary.	✓				✓				
6.5 Risk management is applied to prioritise maintenance tasks.	✓				✓				

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
6.6 Maintenance costs are measured and monitored.	✓				✓				
7. Asset Management Information System	A				1				
7.1 Adequate system documentation for users and IT operators.	✓				✓				
7.2 Input controls include appropriate verification and validation of data entered into the system.	✓				✓				
7.3 Security access controls appear adequate, such as passwords.	✓				✓				
7.4 Physical security access controls appear adequate.	✓				✓				
7.5 Data backup procedures appear adequate and backups are tested.	✓				✓				
7.6 Computations for licensee performance reporting are accurate.	✓				✓				
7.7 Management reports appear adequate for the licensee to monitor licence obligations.	✓				✓				
7.8 Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation.	✓				✓				
8. Risk management	A				1				
8.1 Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.	✓				✓				
8.2 Risks are documented in a risk register and treatment plans are actioned and monitored.	✓				✓				
8.3 The probability and consequences of asset failure are regularly assessed.	✓				✓				
9. Contingency planning	A						3		
9.1 Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.	✓						✓		

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
10. Financial planning	A				1				
10.1 The financial plan states the financial objectives and identifies strategies and actions to achieve those.	✓				✓				
10.2 The financial plan identifies the source of funds for capital expenditure and recurrent costs.	✓				✓				
10.3 The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets).	✓				✓				
10.4 The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period.	✓				✓				
10.5 The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services.	✓				✓				
10.6 Large variances in actual/budget income and expenses are identified and corrective action taken where necessary.	✓				✓				
11. Capital expenditure planning	A				1				
11.1 There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates.	✓				✓				
11.2 The capital expenditure plan provides reasons for capital expenditure and timing of expenditure.	✓				✓				
11.3 The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan.	✓				✓				
11.4 There is an adequate process to ensure that the capital expenditure plan is regularly updated and implemented.	✓				✓				
12. Review of asset management system	A				1				
12.1 A review process is in place to ensure that the asset management plan and the asset management system described in it remain current.	✓				✓				
12.2 Independent reviews (e.g., internal audit) are performed of the asset management system.	✓				✓				

4.5 Detailed Review Observations

The review period is from commencement of the licence on 16 September 2020 to 30 September 2022⁸.

Item no.	Review Priority (1 High to 5 Low)	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)	Process and Policy Rating	Performance Rating
1		ASSET PLANNING		A	2
1.1	2	Asset management plan covers the processes in this table.	<p>The Asset Management Plans were developed in May 2020 for the Leinster drinking water and sewerage systems to ensure the assets continue to provide reliable services to the Leinster town and community in a cost effective manner throughout their useful life. The relevant documents are:</p> <ul style="list-style-type: none"> Asset Management Plan - Leinster Drinking Water Supply System (NLN-NPI-PLN-0003) ('Drinking Water AMP'). Asset Management Plan - Leinster Sewerage System Asset Management Plan (NLN-NPI-PLN-0004) ('Sewerage AMP'). <p>The plans cover the processes in this table.</p>	A	1
1.2	4	Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning.	BHP uses a 5-year strategic asset planning process that includes the definition of objectives and activities needed in order to deliver the required level of service. The plan and budget requirements are reviewed and updated annually. The data collected in the 1SAP system is used to enhance the planning and budgeting process. This approach is consistent with the above Asset Management Plans.	A	1
1.3	4	Service levels are defined in the asset management plan.	<p>Section 4 of both the Drinking Water and Sewerage AMPs outline the objectives for managing the drinking water and sewerage system are:</p> <ul style="list-style-type: none"> Protect public health and safety. Minimise Health, Safety, Environment and Community (HSEC) risks. Meet expectations of continuity and reliability of the water supply. 	A	2

⁸ Note: As per the Audit and Review Guidelines, recommendations are included for criteria rated as process C or D and/or effectiveness of 3 or 4 in the following table. Recommendations for improvements at higher ratings are no longer required to be reported.

Item no.	Review Priority (1 High to 5 Low)	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)	Process and Policy Rating	Performance Rating
			<ul style="list-style-type: none"> Meet expectations of quality, continuity and reliability of sewerage collection and treatment. <p>Service levels are defined in Section 4 of the Drinking Water AMP as follows:</p> <ul style="list-style-type: none"> Quality of drinking water supplied meets Town and Site forecast demand targets. Quality of drinking water supplied meets the requirements of the Australian Drinking Water Guidelines (ADWG). <p>Service levels are defined in Section 4 of the Sewerage AMP as follows:</p> <ul style="list-style-type: none"> Quantity of wastewater treatment meets Town forecast demand targets. <p>It is noted that the Water Services Licence includes pressure and flow standards (a minimum pressure of 15m, a maximum pressure of 100m and a minimum flow of 20 litres per minute) and a requirement to advise customers if the pressure and flow falls outside the range. However, the performance standards are not stated in the Drinking Water AMP or the Customer Charter.</p> <p><i>An improvement is to include the water pressure and flow standards in the Drinking Water AMP and the Customer Charter.</i></p>		
1.4	4	Non-asset options (e.g., demand management) are considered.	<p>With only a minor forecast of growth expected over the next 5 years at the time of preparing the Drinking Water AMP, non-asset options such as demand management were not considered necessary. Future demand may be subject to change if mining activities change and this is monitored by NiW as stated in Section 6 of the plan.</p> <p>The Drinking Water AMP briefly discussed treatment options that would be investigated to improve the drinking water quality to full compliance with the ADWG. During the site visit it was discussed that a significant amount of reject water could result from the treatment process (which is still under investigation) and this may warrant initiatives to manage water use or potential system water loss (leakage). Determining the current level of system water loss would require additional flow metering within the town as there are few customer water meters in place.</p>	A	1

Item no.	Review Priority (1 High to 5 Low)	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)	Process and Policy Rating	Performance Rating
1.5	4	Lifecycle costs of owning and operating assets are assessed.	Section 7 of the Drinking Water and Sewerage AMPs include an assessment of the lifecycle costs including operational costs, planned corrective maintenance, preventative maintenance, breakdown maintenance and a capital strategy over a 5 year period for the assets.	A	1
1.6	4	Funding options are evaluated.	No funding or financial support is required for the operation, maintenance and future investment for the Leinster drinking water and sewerage systems. The core business of NiW is mining, and the provision of water services is to enable the maintenance of a workforce within reasonable proximity to its mining operations. As such, the cost of delivery of these services is considered to be operational expenditure and the projected expenditure for the next five years is included in both AMPs.	A	1
1.7	4	Costs are justified and cost drivers identified.	The understanding of costs and cost drivers is demonstrated in the financial budgets for operational expenditure and capital expenditure included in Section 5 of the AMPs. The plans include forecast expenditure for the next 5 years and actual expenditure for the previous 3 years.	A	1
1.8	4	Likelihood and consequences of asset failure are predicted.	<p>The risk assessment of drinking water assets is discussed in Section 5 of the Drinking Water AMP. The detailed risk assessment is referred to with a summary included in the AMP. The risks considered are asset failure risks which are assessed in terms of safety and financial consequences. The likelihood of failure assessment is based on the asset's visual assessment of condition. Further details are included in the NiW Leinster Drinking Water Supply Asset Integrity Risk Assessment document.</p> <p>Similarly, the risk assessment for the sewerage system assets is discussed in Section 5 of the Sewerage AMP. This follows the same process of assessing risk consequence and likelihood as the drinking water system risks.</p> <p>The assessments are completed in accordance with the requirements of the NIW-IOPS-STD-0001. This process is consistent with the BHP global risk management principles outlined in 'Risk Management – Our Requirements'.</p> <p>The combination of consequence and likelihood results in a risk level of low, moderate, high or extreme. Risks that are high or above require an action to reduce the risk to as low as reasonably practicable.</p>	A	2

Item no.	Review Priority (1 High to 5 Low)	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)	Process and Policy Rating	Performance Rating
			<p>The Asset Integrity Risk process does not include assessment of environmental consequences. Environmental risk assessment appears to be a separate process. Asset related improvements may provide appropriate mitigations for some environmental risks and an improvement suggestion is for this process to be outlined in the AMPs.</p> <p><i>An improvement is to document in the Drinking Water AMP and the Sewerage AMP the asset related actions required as an outcome of Environmental Risk assessment processes.</i></p>		
1.9	4	Asset management plan is regularly reviewed and updated.	<p>The Drinking Water AMP and Sewerage AMPs include revision history tables with the plans being developed in May 2020. The next revision date is stated as August 2022, so the plans are overdue for review. This is considered a minor issue as there have been no significant changes to the services.</p> <p><i>An improvement is to complete the review and update of the Drinking Water AMP and Sewerage AMP which were due in August 2022.</i></p>	A	2
2		ASSET CREATION / ACQUISITION		A	1
2.1	4	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset solutions.	<p>Section 7.2 of the AMPs briefly describe how NiW follow a structured approach for developing capital programs and budgets.</p> <p>The document BHP Capital Projects Our Requirements describes the “phase” requirements for major capital projects with the evaluation activities needed to be complete to pass through the gateways from project initiation, identification, selection, definition and execution.</p> <p>The initiation phase requires a range of investment alternatives to be generated including the option to “optimise without”. These are developed to identify the preferred investment alternative. The “optimise without” option is carried through together with the preferred investment alternative to the selection phase to enable effective evaluation of the preferred alternative.</p>	A	1
2.2	4	Evaluations include all life-cycle costs.	Section 7 of the AMPs include assessment of the lifecycle costs including operational costs, planned corrective maintenance, preventative maintenance, breakdown maintenance and a capital strategy over a 5 year period for the assets.	A	1

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2.3	4	Projects reflect sound engineering and business decisions.	<p>Projects undertaken during the review period included repair of the town tank and a related project at the 11 Mile facility involving installation of variable speed drives and pump control to enable bypassing of the town tank while the repair work was undertaken.</p> <p>Both sites were inspected during the site visit. The success of the pump control project was discussed, providing for uninterrupted water supply to the town for a number of months whilst the town tank was taken off-line for repair and recoating.</p> <p>Project documentation was provided for the tank repair work including design drawings, the Contractor's installation methodology and project schedule, welding procedures, HSE manual and construction risk assessment, all reflecting sound engineering and business decisions.</p> <p>The water supply assets viewed during the site visit were in good condition and the project documentation sighted indicated sound engineering and business decisions.</p>	A	1
2.4	4	Commissioning tests are documented and completed.	Copies of Manufacturing Data Records and completed Inspection and Test Plans were provided for the tank project.	A	1
2.5	4	Ongoing legal/environmental /safety obligations of the asset owner are assigned and understood.	<p>The 200320-Water Services Licence Document Map provides a useful guide to the Regulatory documents, Management Plans, Procedures and Work Instructions that form NiW approach to the Leinster Drinking Water and Sewerage Services.</p> <p>Table 1 of the Leinster Drinking Water Supply System – Operations and Maintenance Manual provides a list of Regulatory Compliance and Management Related Documents relating to Drinking Water. This includes:</p> <ul style="list-style-type: none"> • ERA Water Services Licence • Groundwater Abstraction Licence • Nickel West Leinster Drinking Water Quality Management Plan • Nickel West Leinster Drinking Water Source Protection Plan* • MoU between Department of Health and BHP NiW for Drinking Water** 	B	1

Item no.	Review Priority (1 High to 5 Low)	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)	Process and Policy Rating	Performance Rating
			<p>The Water Source Protection Plan is not yet finalised but has been drafted and reviewed by Department of Environment and Water Regulation (DWER).</p> <p>NiW advised the MoU with the Department of Health for drinking water is also at a draft stage and needs to be finalised.</p> <p>The sewerage AMP references the Wastewater Treatment Plant Environmental Licence to Operate and includes the licence monitoring requirements (DEWR). NiW operate the Leinster WWTP under the Wastewater Treatment Plant Environmental Licence to Operate, L6606/1995/9. This licence is based on compliance with the <i>Environmental Protection Act 1986</i> and is regulated by the Department of Environment Regulation (DER).</p> <p>The licence permits NiW to discharge treated sewage onto land up to a maximum of 600 m³/day. The licence also requires NiW to monitor the discharge volumetric flow rate and quality. The obligations are assigned in the AMP – Sewerage and are being complied with.</p> <p><i>As noted in recommendation 5/2022, the draft Memorandum of Understanding (MoU) between the Department of Health and NiW for drinking water and should be finalised as soon as possible.</i></p> <p><i>An improvement opportunity is to finalise the Water Source Protection Plan when the MoU has been finalised.</i></p>		
3		ASSET DISPOSAL		A	1
3.1	4	Under-utilised and under-performing assets are identified as part of a regular systematic review process.	Section 5.2 of the AMPs (Asset Condition) and section 7.2 (Capital Strategy) describe the regular assessment of performance, condition and risk to identify under-performing assets.	A	1
3.2	4	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken.	As a result of the regular assessment, a number of replacement projects were identified in the Drinking Water System AMP (e.g. upgrade of two drinking water bores with larger casings and pumps and installation of a new substation at 11 Mile to address arc flash compliance standards).	A	1

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			No replacement projects were identified for the sewerage system on the basis of assets being assessed as performing well, in at least fair condition and not posing an unacceptable level of risk.		
3.3	4	Disposal alternatives are evaluated.	Section 7 of the AMPs describes that asset disposal is generally completed as part of a replacement project rather than a discrete program for decommissioning. This is considered adequate.	A	1
3.4	4	There is a replacement strategy for assets.	The AMPs only forecast capital (and operating) expenditure for the next 5 years. However, there is understanding of expected asset lives (refer Appendix B of the Sewerage AMP) and the condition assessment process and risks assessments are used to refine the timing for replacement decisions, even for projects identified within the 5 year timeframe.	A	1
4		ENVIRONMENTAL ANALYSIS		B	1
4.1	2	Opportunities and threats in the system environment are assessed.	The AMP adequately sets out the overall system environment. The opportunities and threats are documented in the Risk Assessment and Mitigation Measures document. The risks include detailed risk assessments for categories of risk being ground water system, treatment plant, storage, reticulation and consumers.	A	1
4.2	4	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved.	Service levels are documented in the AMPs, including availability of service, service interruptions and system failure or complaint. These are reviewed on a regular basis. Over the review period of 2 years, there has been 1 planned service interruption and 2 customer complaints re water quality which have been satisfactorily resolved. NiW do at least weekly inspections and have remote monitoring of critical components. There are also contract plumbers and electricians available on call near the plant.	A	1

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4.3	4	Compliance with statutory and regulatory requirements.	<p>Section 3 of the AMP lists regulatory requirements relating to the ERA, DoH and DWER (water and environment). Safety is not referenced although Appendices are referred which include a Work, Health and Safety Policy and a Job Safety Analysis.</p> <p>There is also a Compliance and Reporting Register with the ongoing regulatory obligations to ERA, DOH and DWER.</p> <p>The following regulatory approvals from other agencies are in place:</p> <ul style="list-style-type: none"> • Department of Environment Regulation <i>Environmental Protection Act (1986)</i> for the Leinster WWTP L6606/1995/9 Approval to 03/04/2032. • Department of Water and Environmental Regulation <i>Environmental Protection (Controlled Waste) Regulations 2004</i> for the transport of dried sludge from the WWTP to the Site landfill. T00742 15/05/2021. • Department of Water and Environmental Regulation <i>Rights in Water and Irrigation Act (1914)</i> for the approval to take water. GWL63834(4) 13/04/2025. • Department of Health <i>Medicines and Poisons Act (2014)</i> for the purchase of chlorine gas for application during drinking water treatment 16931 30/06/2021. • Department of Mines, Industry Regulation and Safety <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> for the storage and handling of chlorine gas 15478 and 15479 21/10/2021. <p>The Memorandum of Understanding (MoU) between the Department of Health and BHP Billiton Nickel West Pty Ltd for Drinking Water at Leinster is in draft and is being reviewed by the Department of Health.</p> <p><i>As noted in recommendation 5/2022, the draft Memorandum of Understanding between the Department of Health and NiW for drinking water should be finalised as soon as possible.</i></p>	B	1

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4.4	4	Achievement of customer service levels.	<p>Service levels are documented in the Drinking Water AMP and Sewerage AMP after and Sewerage AMP, including availability of service, service interruptions and system failure or complaints. These are reviewed on a regular basis.</p> <p>Note: As per the Drinking Water AMP, the quality of water does not fully meet ADWG guidelines due to the high nitrate concentrations in the water supply. The drinking water is unsuitable for pregnant women and children under the age of three months to consume. Water treated using reverse osmosis to reduce nitrate concentrations to acceptable levels is available from the Medical Centre or Camp Mess and the Fly-in Fly-out village.</p> <p>Over the review period of 2 years, there has been 1 planned service interruption and 2 customer complaints re the water quality which have been satisfactorily resolved. This indicates that customer service levels are being achieved.</p>	A	1
5		ASSET OPERATIONS		A	1
5.1	4	Operational policies and procedures are documented and linked to service levels required.	<p>Operational policies and procedures are documented in the NiW Leinster Drinking Water Supply Operations and Maintenance Manual. The manual lists service levels and compliance requirements as key objectives for the operation and maintenance of the system. More detailed asset-specific Operations and Maintenance (O&M) documents are also referenced (e.g. Operating Manual for the Camp Mess Reverse Osmosis (RO) Plant and the Chlorination System O&M Manual).</p> <p>The Camp Mess Reverse Osmosis (RO) plant was visited during the site visit. This is a relatively new facility that has replaced a previous RO plant. A review of daily monitoring records indicated a chlorine residual of zero was being recorded. When queried what the target chlorine residual was, the operator advised the chlorination has been switched off due to taste complaints in the Mess. This was a local operator solution. In managing drinking water safety, it would be expected that a process would be worked through to provide a solution.</p> <p>O&M activities are scheduled using work orders – activities range from inspections (daily/weekly/fortnightly etc) to planned and reactive maintenance. An output of the work orders for water and wastewater including completion</p>	B	1

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			status was provided from for the period from September 2020 to January 2023 for review that confirmed the completion of scheduled and reactive activities. <i>There is an opportunity to strengthen the operational procedures around the Camp Mess RO plant by formalising a review of the need for chlorination and the decision making process for making changes.</i>		
5.2	4	Risk management is applied to prioritise operations tasks.	All high risks identified for the scheme and recommended control improvements are included in the Leinster Drinking Water Quality Management Plan (NLN-HSEC-PLN-0001). The Australian Drinking Water Guidelines (ADWG) defines a critical control point (CCP) as an activity, procedure or process at which control can be applied and which is essential to prevent a hazard or reduce it to an acceptable level. Critical Control Points were evaluated through a high-level HACCP risk assessment using the CODEX decision tree. Chlorination was identified as the only critical control point in the current system as this is the critical barrier for the majority of pathogen contamination events. Chlorine residual is continuously monitored downstream of the drinking water pumping stations, which are interlocked with the chlorination system and will be automatically shut down for a chlorine fault or high and low chlorine residuals. A quarterly water quality meeting is also held. Copies of a sample of these meeting minutes and assigned actions were provided for review. Included in the agenda items are review of water quality trends, customer feedback, risk management, operations and maintenance including planned training.	A	1
5.3	4	Assets are documented in an Asset Register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition and accounting data.	The Drinking Water AMP and Sewerage AMP (Appendix A) include a detailed list of the assets and their condition assessment. The water supply and sewerage system assets are also recorded in NIW's 1SAP asset register. 1SAP is NIW's Enterprise Resources Planning application to record equipment data. Graphical equipment data is recorded on drawings in a drawing library. Procedures are in place to maintain and update these records in case of acquisition of new assets or decommissioning/disposal of existing assets.	A	1

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			Asset integrity is monitored by regular inspection programmes. The intensity of monitoring depends on the risk levels.		
5.4	4	Accounting data is documented for assets.	The reviewer sighted the annual Financial Reports for BHP for 2020/21 and 2021/22 prepared by external accountants. This confirms that accounting data is documented in the financial system.	A	1
5.5	4	Operational costs are measured and monitored.	The Manager – HSE confirmed that operational costs are recorded and reviewed against budgets on monthly financial reporting.	A	1
5.6	4	Staff resources are adequate and staff receive training commensurate with their responsibilities.	Competency requirements for operations and maintenance personnel involved in source water, treatment and distribution are identified and documented in position profiles. Training plans are then established and implemented to ensure employees and contractors are competent. Cert III training in Water Operations has been implemented for all NIW plumbers based at Leinster. Completion of training is discussed as part of the quarterly water quality meeting. The site visit confirmed that staff and contractor resources are adequate to maintain the drinking water and sewerage systems.	A	1
6		ASSET MAINTENANCE		A	1
6.1	4	Maintenance policies and procedures are documented and linked to service levels required.	The Leinster asset performance data is recorded in NIW's Asset Management System, 1SAP. The system records both planned and responsive maintenance activities. The maintenance activities that are undertaken for the Leinster drinking water supply system can be categorised by the following programs: <ul style="list-style-type: none"> Planned Corrective Maintenance (PM01): Planned non-scheduled maintenance required to rectify a known issue which is not urgent. Corrective maintenance work is generally identified through preventive maintenance. Preventive Maintenance (PM02): Planned scheduled maintenance necessary to ensure the reliability or to sustain the design life of an asset. Preventive maintenance generally includes asset servicing and inspections. 	A	1

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			<ul style="list-style-type: none"> Breakdown Maintenance (PM03): Unplanned maintenance required to bring an asset back to working order when it has failed or is worn out. This work must be completed within 1 to 8 days. Project Work (PM06): Engineering requests that lead to project work such as replacement or improvements that must be programmed. <p>Depending on the asset type, the scheduling of maintenance is based on a run to fail (and replacement), fixed time maintenance or a condition-based monitoring approach.</p> <p>Qualified plumbers are employed by NIW and are in attendance every day of the year. Responsibility for operations and maintenance of the drinking water and sewerage system is divided between the Site and Town based maintenance groups.</p> <p>The Site based group is responsible for the operation and maintenance of the source water bores, chlorination system, all instrumentation, and the distribution system to the town tank. The Site plumbers are also responsible for water supply and sewerage at the mine and processing facilities, which is not included in the scope of the licence. The Town based maintenance group looks after distribution of drinking water, the reverse osmosis plants at the Camp Mess and Medical Centre, collection of sewage and the wastewater treatment plant located on the outskirts of town.</p> <p>Note: As per the Drinking Water AMP, the quality of water does not fully meet ADWG guidelines due to the high nitrate concentrations in the water supply. The drinking water is unsuitable for pregnant women and children under the age of three months to consume. Water treated using reverse osmosis to reduce nitrate concentrations to acceptable levels is available from the Medical Centre or Camp Mess and the Fly-in Fly-out village.</p>		
6.2	4	Regular inspections are undertaken of asset performance and condition.	<p>Asset inspections and asset condition monitoring are regularly performed to identify renewals, rehabilitation and replacements required to ensure reliable ongoing levels of service.</p> <p>Maintenance and inspection requirements and frequencies for plant and equipment are defined in Operating and Maintenance Manuals or Asset Management Plans, with the planned maintenance instructions (PMI's) pre-</p>	A	1

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			loaded into the 1SAP works management system allowing automatic generation of work orders when inspection and attendance is required. The Drinking Water AMP and the Sewerage AMP include the preventive maintenance schedules for the water supply and sewerage systems respectively. There are also a number of key vendor developed documents for the chlorination system, Camp Mess and Medical Centre reverse osmosis plants and the wastewater treatment plant.		
6.3	4	Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.	The maintenance plans for the Leinster drinking water and sewer systems are loaded into NIW's Asset Management System, 1SAP including: <ul style="list-style-type: none"> The Planned Corrective Maintenance (PM01) Program is required to rectify known issues where the repair is not urgent and can be planned. This work is generally identified through preventative maintenance. The Preventive Maintenance (PM02) Program includes scheduled inspections, servicing and monitoring of assets to ensure the quality and reliability of the service is maintained. The Breakdown Maintenance (PM03) Program is required to restore an asset to working condition to deliver the required level of service (e.g. repair of leaking or burst pipes). Appendix C of both AMPs document the Preventative Maintenance Program. Other operations and maintenance manuals exist for specialised equipment (e.g. Leinster Chlorination System – Operation and Maintenance Manual) A sample list of PM01, PM02 and PM03 work orders was obtained and confirms maintenance plans are completed.	A	1
6.4	4	Failures are analysed and operational/maintenance plans adjusted where necessary.	The current asset management system uses information from corporate systems such as 1SAP and Envirosys to review asset performance. Asset performance is measured and monitored by means of the following techniques: <ul style="list-style-type: none"> Drinking water quality monitoring programme Effluent quality monitoring program Flow and demand data Recording of breakdown maintenance 	A	1

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			<ul style="list-style-type: none"> Customer feedback Operational cost accounting Incident reporting <p>Asset performance is controlled and optimised by the application of the risk management process.</p>		
6.5	4	Risk management is applied to prioritise maintenance tasks.	The AMPs (section 7.1) state the operational strategy is based on a planned corrective maintenance program based on historical expenditure and a preventative maintenance program, including inspections, servicing and monitoring, to ensure the quality and reliability of the services is maintained.	A	1
6.6	4	Maintenance costs are measured and monitored.	<p>The Drinking Water and Sewerage AMPs section 5.1 include information on the type of maintenance completed in the past 3 years and in section 5.4 the cost of planned, preventative and breakdown maintenance over the past 3 years.</p> <p>The Drinking Water AMP describes an increase in expenditure on Planned Corrective Maintenance which correlated with increased operation of the Nickel mine. The expenditure was related to replacement of pipework, valves, flow meters and switchboards at production bores and valves on the pipelines from 11 Mile and within the town distribution. Maintenance costs were predicted to stabilise following this period of concentrated renewals.</p> <p>The Sewerage AMP provides a similar review of maintenance activities and costs over the past 3 years. The costs remained stable over the period and were projected to remain at those levels for the foreseeable future.</p> <p>Both AMPs forecast the operations and maintenance costs over a 5 year period, stating these are an estimate subject to annual review following the BHP Corporate Alignment Planning process.</p> <p>The cost of maintenance activities was observed as being captured against the completed PM01, PM02 and PM03 activities in the records provided.</p>	A	1

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7		ASSET MANAGEMENT INFORMATION SYSTEM		A	1
7.1	4	Adequate system documentation for users and IT operators.	<p>BHP uses the “1SAP” asset management system for asset and work management processes. The work management processes defined in 1SAP provide BHP with the ability to identify, plan, schedule, execute and manage multidisciplinary work activities. Work management processes are used for the development of repeatable work plans and strategies, reporting and investigating HSE and other events and management of work execution (e.g. generation of work orders for planning and scheduling work, shutdown management and contractor management). 1SAP is also utilised for data collection and management, analysing performance and documenting asset condition.</p> <p>NIW has established a comprehensive Management System and hierarchy of supporting documentation which defines water supply and sewerage system responsibilities. It includes a range of controlled documents covering health and safety, project development and implementation, operations and maintenance, and training.</p> <p>All NIW employees have access to current procedures by means of the company intranet.</p>	A	1
7.2	4	Input controls include appropriate verification and validation of data entered into the system.	Data accuracy is controlled by edit checks of data fields in the key system and checks by the user when entering manually completed work order requests and updates. Considered adequate.	A	1
7.3	4	Logical security access controls appear adequate, such as passwords.	<p>The NIW Information Technology (IT) Department is responsible for the administration, operation and maintenance of the IT systems.</p> <p>Data is encrypted using AES-128 standard and stored in secure data centres or hosting facilities. Procedures are in place for user authentication, cyber security, IT risk management, incident management and disaster recovery.</p> <p>The IT systems are accessible via authorised computer terminals (on the LAN) and users require a valid account and current password. The computer terminals are not available to the general public and are located in approved</p>	A	1

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			lockable buildings. In addition, the IT systems are remotely accessible to authorised users using a two-factor authentication system. Restricted access is given to authorised users of the following systems: <ul style="list-style-type: none"> Supervisory Control and Data Acquisition (SCADA) systems. Enterprise Resources Planning system 1SAP. 		
7.4	4	Physical security access controls appear adequate.	The physical access restrictions to the site office in Leinster were confirmed during the field visit. All offsite assets (e.g., bores, pump stations, storage tanks, water treatment plant) are located in secure, fenced and locked compounds. Access to systems via Laptop PCs and mobile devices is controlled by passwords, which are required to be changed on a regular basis.	A	1
7.5	4	Data backup procedures appear adequate and backups are tested.	Data is continually backed up to cloud storage with a managed Information Technology (IT) service provider. There is also a physical back up of the key data systems used by NiW to external hard drives. Backups are tested and data backup procedures are sound.	A	1
7.6	4	Key computations related to licensee performance reporting are materially accurate.	From review of source data for the performance reporting, the calculations are considered to be accurate.	A	1
7.7	4	Management reports appear adequate for the licensee to monitor licence obligations.	Service levels are documented in the Drinking Water AMP and Sewerage AMP after and Sewerage AMP, including availability of service, service interruptions and system failure or complaints. These are reviewed on a regular basis, including quarterly meetings to review all service standards. Minutes of these meetings were sighted.	A	1
7.8	4	Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation.	Access to all systems have restricted user access and require passwords that are regularly changed. Data is continuously backed up to cloud storage. There is also a physical back up of the key data systems used by NiW. Backups are tested and data backup procedures are sound.	A	1

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8		RISK MANAGEMENT		A	1
8.1	4	Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.	<p>BHP's risks are managed on an enterprise-wide basis in accordance with the group document Risk Management – Our Requirements. The natural diversification in its portfolio of commodities, geographies, currencies, assets and liabilities is a key element in its risk management approach.</p> <p>ERA Water Services Licence Application - Leinster Drinking Water and Sewerage Services - BHP Nickel West states:</p> <ul style="list-style-type: none"> Risk management is embedded in all critical business activities, functions and processes. Materiality and tolerance for risk are key considerations in decision-making. Each year the BHP Board reviews and considers the risk profile for the whole Group. This risk profile covers both operational and strategic risks. The risk profile is assessed to ensure it supports the achievement of the Group's strategy while maintaining a solid 'A' credit rating. Risk issues are identified, analysed and assessed in a consistent manner. Performance requirements exist for the identification, assessment, control and monitoring of material risk issues that could threaten the corporate purpose and business plans. 	A	1
8.2	4	Risks are documented in a risk register and treatment plans are actioned and monitored.	<p>The risk assessment of drinking water assets is included in Section 5 of the Drinking Water AMP. The specific risks include the failure of assets and other interruptions to supply, as well as safety and financial risks. The likelihood and consequences of failure, including mitigation measures, are assessed. The process is consistent with the BHP global risk management principles outlined in the Risk Management – Our Requirements document. Further details are included in the NiW Leinster Drinking Water Supply Asset Integrity Risk Assessment document.</p> <p>The risk assessment for sewerage is included in Section 5 of the Sewerage AMP. This assessment was completed in accordance with the requirements of the Nickel West Standard Asset Integrity NIW-IOPS-STD-0001. The risk assessment process assesses likelihood of failure and consequence of failure to determine the resultant risk of each asset. This process is consistent with the</p>	A	1

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			<p>BHP global risk management principles outlined in 'Risk Management – Our Requirements'. There were no risks assessed as high risk.</p> <p>The risk assessments in the AMP are to be reviewed every 2 years, although the latest review due in August 2022 is overdue. This is considered a minor issue as the site visit confirmed the risks are being reviewed on a weekly basis through maintenance checklists.</p>		
8.3	4	The probability and consequences of asset failure are regularly assessed.	<p>In July 2020, NIW completed an asset integrity risk assessments for the drinking water and sewerage system assets in accordance with the requirements of the NIW Standard Asset Integrity NIW-IOPS-STD-0001. The risk assessment process assesses likelihood of failure and consequence of failure to determine the resultant risk of each asset.</p> <p>This process is consistent with the BHP global risk management principles outlined in 'Risk Management – Our Requirements'.</p> <p>The likelihood of failure assessment is based on an asset's visual assessment of condition. The likelihood is assessed with preventive controls (scheduled maintenance, inspections and condition assessment) in place. The consequence severity assessment considers impacts that apply to safety and financial loss, environmental impacts arising from the water supply operations are not covered in this assessment. The consequence is assessed with mitigating controls (duty/standby arrangement, critical spares, equipment interchangeability and emergency response) in place.</p> <p>The risk assessment was completed for 32 'Assets Groups' in the drinking water system and 43 for the sewerage system. The risk assessment identifies improvement actions to mitigate high risks with an assessment of revised risk following implementation.</p> <p>The risks are regularly reviewed in quarterly meetings. Minutes of the meetings were sighted.</p>	A	1

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9		CONTINGENCY PLANNING		A	3
9.1	2	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.	<p>Contingency plans are documented in the Leinster Drinking Water Incident Response Plan (NLN-HSEC-PLN-0002). This considers a range of possible events including a chlorine leak, bush fire that threatens the drinking water supply, loss of drinking water supply (e.g. due to a pipe failure, pumping failure or chlorination equipment failure) and water quality incidents.</p> <p>The Incident Response Plan states that:</p> <p>“As per the requirements of NIW-HSEC-PRO-0008 Nickel West Emergency Management Plan Part 1, at least one Incident Response Plan (IRP) must be trialled annually, alternating each year between desktop and field exercises. Under the MoU with DoH, NIW has agreed to jointly undertake reasonable levels of staff training for incident response plans and conduct joint exercises annually. These joint exercises can be desktop in nature and do not necessarily need to have a field component. The format of the exercises will be agreed with DoH each year.</p> <p>Under the MoU with DoH, NIW has agreed to jointly maintain and review incident response plans with the DoH.”</p> <p>There are no records of testing (desk-top or field based) being undertaken of the incident response plans since they were developed in May 2020. The Incident Response Plan was also due for review in August 2022.</p> <p>Recommendation 8/2022</p> <ol style="list-style-type: none"> As stated in the Leinster Drinking Water incident Response Plan, the Plan should be trialled annually, alternating each year between desktop and field exercises, in conjunction with the Department of Health. Suitable documentation of the trail/test and any corrective actions should be retained. The Incident Response Plan (due for review in August 2022) should be reviewed and updated. 	A	3

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10		FINANCIAL PLANNING		A	1
10.1	4	The financial plan states the financial objectives and strategies and actions to achieve the objectives.	The water supply and sewerage systems are required to sustain the workforce for nickel mining and processing at Leinster. There is no charge for the services and therefore no projected revenue. As such there is no need to demonstrate the financial viability achieved from the sale of drinking water or sewage collection and treatment charges under this licence.	A	1
10.2	4	The financial plan identifies the source of funds for capital expenditure and recurrent costs.	The water supply and sewerage systems are required to sustain the workforce for nickel mining and processing at Leinster. There is no charge for the services and therefore no projected revenue. As such there is no need to demonstrate the financial viability achieved from the sale of drinking water or sewage collection and treatment charges under this licence.	A	1
10.3	4	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets).	The water supply and sewerage systems are required to sustain the workforce for nickel mining and processing at Leinster. There is no charge for the services and therefore no projected revenue. As such there is no need to demonstrate the financial viability achieved from the sale of drinking water or sewage collection and treatment charges under this licence. Operating and capital expenditure is planned for a 5 year period and ongoing costs are compared to budget on a monthly basis.	A	1
10.4	4	The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period.	The water supply and sewerage systems are required to sustain the workforce for nickel mining and processing at Leinster. There is no charge for the services and therefore no projected revenue. As such, there is no need to demonstrate the financial viability achieved from the sale of drinking water or sewage collection and treatment charges under this licence.	A	1
10.5	4	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services.	Projected expenditure for the next five years is included in the Drinking Water AMP and the Sewerage AMP. This includes operations and maintenance and capital expenditure. There is no applicable administration expenditure as there is no billing of customers.	A	1

Item no.	Review Priority (1 High to 5 Low)	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)	Process and Policy Rating	Performance Rating
10.6	4	Significant variances in actual/budget income and expenses are identified and corrective action taken where necessary.	An annual operating budget is prepared identifying monthly expenditure. There is evidence of comparison of the annual budget to the previous year's actuals.	A	1
11		CAPITAL EXPENDITURE PLANNING		A	1
11.1	4	There is a capital expenditure plan that covers issues to be addressed, actions proposed, responsibilities and dates.	The Drinking Water AMP and the Sewerage AMP (Section 7.2) include a structured approach for developing capital programs and budgets (in conjunction with the BHP Corporate Alignment Planning(CAP) - Our Requirements procedure. At the conclusion of each CAP cycle, capital programs and budgets are allocated by BHP to NiW for the coming financial year but these are subject to change by NiW and BHP management, depending on business circumstances. The capital budget information presented in this section is based on current knowledge and is subject to annual review following the BHP CAP process. Projected capital expenditure for the next five years, including issues to be addressed, actions proposed, responsibilities and dates are included in the Drinking Water AMP and the Sewerage AMP.	A	1
11.2	4	The plan provides reasons for capital expenditure and timing of expenditure.	The reviewer confirmed the Capital Expenditure Plan is based on review of the condition of the assets and the estimated life of the assets as recorded in the Drinking Water AMP and the Sewerage AMP. The AMPs include the expected capital expenditure for 5 years.	A	1
11.3	4	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan.	The reviewer confirmed the Capital Expenditure Plan is based on review of the condition of the assets and the estimated life of the assets as recorded in the Drinking Water AMP and the Sewerage AMP. The asset life is also stated in the plans.	A	1
11.4	4	There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned.	The AMP includes review and update as required or if major changes occur. The capital expenditure planning process is considered adequate for the drinking water and sewerage assets.	A	1

Item no.	Review Priority (1 High to 5 Low)	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)	Process and Policy Rating	Performance Rating
12		REVIEW OF ASSET MANAGEMENT SYSTEM		A	1
12.1	4	A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.	The Drinking Water AMP and Sewerage AMP include revision history tables with the plans being developed in May 2020. The next revision date is stated as August 2022, so the plans are overdue for review. This is considered a minor issue as there have been no significant changes to the services.	A	1
12.2	4	Independent reviews (e.g., internal audit) are performed of the asset management system.	Independent reviews of specific elements of the water services have been conducted during the review period by external contractors as required. An independent review is also performed (by the ERA appointed auditors) every 24 months as required by the licence or longer period as specified by the ERA.	A	1

4.6 Review Recommendations

Table of Current Review Asset System Deficiencies and Recommendations

A. Resolved during current review period			
Reference (no./year) Compliance rating	Asset System Deficiency (AMS Component/Effectiveness Criteria/Details)	Auditor's Recommendation	Management Action taken by end of review period
	Nil		
B. Unresolved during current review period			
Reference (no./year) Compliance rating	Asset System Deficiency (AMS Component/Effectiveness Criteria/Details)	Auditor's Recommendation	Management Action taken by end of audit period
8/2022 A3	<p>Contingency Planning</p> <p><i>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</i></p> <p>Contingency plans are documented in the Leinster Drinking Water Incident Response Plan (NLN-HSEC-PLN-0002). This considers a range of possible events including a chlorine leak, bush fire that threatens the drinking water supply, loss of drinking water supply (e.g. due to a pipe failure, pumping failure or chlorination equipment failure) and water quality incidents.</p> <p>The Incident Response Plan states that:</p> <p>“As per the requirements of NIW-HSEC-PRO-0008 Nickel West Emergency Management Plan Part 1, at least one Incident Response Plan (IRP) must be trialled annually, alternating each year between desktop and field exercises. Under the MoU with DoH, NIW has agreed to jointly undertake reasonable levels of staff training for incident response plans and conduct joint exercises annually. These joint</p>	<p>a) As stated in the Leinster Drinking Water incident Response Plan, the Plan should be trialled annually, alternating each year between desktop and field exercises, in conjunction with the Department of Health. Suitable documentation of the trial/test and any corrective actions should be retained.</p> <p>b) The Incident Response Plan (due for review in August 2022) should be reviewed and updated.</p>	No action to end of audit period.

B. Unresolved during current review period			
Reference (no./year) Compliance rating	Asset System Deficiency (AMS Component/Effectiveness Criteria/Details)	Auditor's Recommendation	Management Action taken by end of audit period
	<p>exercises can be desktop in nature and do not necessarily need to have a field component. The format of the exercises will be agreed with DoH each year.</p> <p>Under the MoU with DoH, NIW has agreed to jointly maintain and review incident response plans with the DoH."</p> <p>There are no records of testing (desk-top or field based) being undertaken of the incident response plans since they were developed in May 2020.</p> <p>The Incident Response Plan was also due for review in August 2022.</p>		

Appendix A - Methodology

A1. Audit and Review Approach

Our approach to meeting the requirements for the operational audit and asset management system effectiveness review is set out below.

Audit and Review Planning

- Conduct an initial meeting with the ERA to confirm the audit/review approach and timing for the audit and review (*not required*).
- Contact the licensee to gain an understanding of the business, relevant management plans and systems that may affect the risk assessment for planning purposes.
- Prepare a risk assessment including any specific factors or changes relevant to the licensee (in tabular form against each licence condition and asset management system component).
- Submit a draft **Audit and Review Plan**, including the risk assessment and proposed approach, to the ERA for review and approval.
- Send a **Pre-Visit Checklist** of information and documentation to the licensee to enable staff to prepare for the visit (and where possible, send us information prior to the site visit).

Fieldwork

- Undertake a visit to the licensee and conduct various meetings with stakeholders, including corporate services and works/facilities management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards. The on-site visit will include our Principal Engineer.
- Obtain copies of the latest asset management plans, performance reporting statistics and relevant correspondence between the licensee and the ERA for the audit period.
- The audit steps for the **Operational Audit** will include:
 - **analysis of documented procedures** to assess whether they are consistent with regulatory requirements or arrangements under the licence;
 - **review of systems and procedures** to assess whether they reflect compliance obligations and performance standards, including assessing and testing the following:
 - **control environment** – management's philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the key staff members;
 - **information system** – the appropriateness of the information systems to record the information needed to comply with the licence, accuracy of data, security of data, cyber security and documentation describing the information system;
 - **control procedures** – the presence of systems and procedures to monitor compliance with the licence or the effectiveness of the asset management system and to detect and correct non-compliance or under-performance;
 - **compliance attitude** - the action taken by the licensee in response to the previous audit/review recommendations, and an assessment of management's attitude towards compliance; and

- **outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- Update the risk assessment with any new information obtained in the course of the audit testing and, in instances of significant non-compliance, assess the licensee's plan to ensure compliance and recommend any further improvements to achieve compliance.
- The activities in the **Asset Management System Review** will include:
 - analyse the documented procedures and processes for the planning, construction, operation and maintenance of assets to assess whether they are consistent with regulatory requirements under the licence;
 - interview key personnel to assess whether they understand and comply with the documented processes and procedures;
 - physically inspect the key assets and infrastructure; and
 - assess the effectiveness of the processes and system in place.

Audit and Review Reporting

- Prior to the conclusion of the visit, the lead auditor will discuss any observations and recommendations with the licensee's management to confirm our understanding of the issues and to discuss the action to be taken.
- Provide a draft report to the ERA for review no later than two weeks before the final report is due and make any revisions necessary.
- Provide the updated draft report to the ERA for review and feedback prior to finalising the report.
- Issue the final report to the ERA.
- The ERA will arrange responses to the proposed actions in the Post Audit Implementation Plan.

A2. Key Documents Reviewed

Regulatory Documents and Reports

- Water Services Act 2012
- Water Services Code of Conduct (Customer Service Standards) 2018
- Water Services Code of Practice (Family Violence) 2020
- Water Services Regulations 2013
- 2019 Audit and Review Guidelines: Water Licences (updated July 2022)
- Water Compliance Reporting Manual 2021 (and previous version May 2020)
- ERA Water Services Licence Application - Leinster Drinking Water and Sewerage Services - BHP Nickel West
- Water Services Operating Licence WL52 – Version 1 (From 16 September 2020 to 20 September 2021) and Version 2 (From 21 September 2021 to current)
- Map of Licence Operating Area OWR-OA-318- A
- Compliance report to ERA for 2020/21 and 2021/22 (and evidence of receipt by ERA).
- Performance reports to ERA for 2020/21 and 2021/22 (and evidence of receipt by ERA).
- Performance reporting datasheets for 2020/21 and 2021/22.
- Water, Sewerage and Irrigation Licence Performance Reporting Handbook 2022
- Energy & Water Ombudsman membership
- Relevant correspondence between the Licensee and the ERA

Operational Audit

- BHP Annual Reports for 2020/21 and 2021/22
- Customer Charter – Leinster Drinking Water and Wastewater Services
- NiW's Managing Customer Feedback at Leinster Procedure
- ERA Licence Fee invoices and payment advice
- HSEC Licences and Approvals procedure
- Quarterly Potable Water Reports to Department of Health
- Compliance and Reporting Register with the ongoing regulatory obligations to ERA, DOH and DWER
- Residential Tenancy Agreement

Asset Management System Review

- Asset Management Plan – Leinster Drinking Water Supply System
- Asset Management Plan – Leinster Sewerage System
- Nickel West Leinster Drinking Water Quality Management Plan
- Nickel West Leinster Drinking Water Source Protection Plan
- Leinster Drinking Water Supply System - Operations and Maintenance Manual
- Leinster Drinking Water Incident Response Plan
- Leinster Township Emergency Management
- NIW Standard Asset Integrity
- NiW Leinster Drinking Water Supply Asset Integrity Risk Assessment
- PFA NiW Fixed Asset Register
- BHP Capital Projects Our Requirements
- Minutes of Quarterly Drinking Water meetings
- Planned Maintenance Instructions (PMI's) (Examples)
- Project documentation for the tank repair work
- Manufacturing Data Records and completed Inspection and Test Plans for the tank project.

A3. Key Contacts

The licensee's representatives participating in the audit were:

- Gerard Gleeson – Manager Health Safety & Environment (HSE)
- John Vink – Lead Project Engineer - NOR
- Tess Walker - Facilities Maintenance Administrator
- Katie-Maree Hill – Superintendent Asset Integrity, Maintenance Services
- Jesse Potts –Supervisor Site Services
- Ian Pritchard – Superintendent Town and Village

A4. Consultants

NAME AND POSITION	BUDGET HOURS
Geoff White - Director	30
Susan Smith - Manager	25
Geoff Hughes – Principal Engineer	25
TOTAL	80

END OF REPORT