

Recommendation reference (no./year)	Non-compliance / Controls improvement (Rating / Licence obligation reference number and licence obligation / Details of non-compliance or inadequacy of controls)	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
A1/2025	<p>Obligation 154AA (2024) (B2)</p> <p><i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 52(3)</i></p> <p>A licensee must ensure that the specified information about Part 9 may be obtained from its website.</p> <ul style="list-style-type: none"> • Stantec could not locate the specified information about the preserved supply register on Busselton Water's website. 	<ul style="list-style-type: none"> • Busselton Water should add a fact sheet or equivalent on the website to provide the required information about Part 9 of the code (preserved supply register). 	Update BW's website to include information pertaining to the Preserved Supply Register including how customers can apply to be registered and BW obligations.	MCS (Manager Customer Service)	30/9/25
A2/2025	<p>Obligation 191 (B2)</p> <p><i>Water Services Code of Practice (Family Violence) 2020 Clause 5(1)</i></p> <p>The licensee must have a family violence policy that sets out the matters specified in clause 5(1).</p> <ul style="list-style-type: none"> • Stantec considers that the policy does not fully address the matters specified in clause 5(1) of the code of practice leading to non-compliance with this obligation. 	<ul style="list-style-type: none"> • Review and update the Family Violence Policy. The policy requires improvement to fully satisfy the requirements of Water Services Code of Practice (Family Violence) 2020 Clause 5(1). • Specifically, Stantec have identified the following gaps in the policy that will need to be addressed: <ul style="list-style-type: none"> – A process by which the account of a Customer Affected by Family Violence (CAFV) can be identified by employees without the need for customers to repeat details of the issues – How and when information about external services offering support is to be provided to the CAFV. – How the info obtained from a CAFV is protected. – The circumstances a CAFV is taken to be experiencing payment difficulties or financial hardship. – How Busselton Water will deal with debt management and recovery in relation to a CAFV account. 	Conduct a review and update the Family Violence Policy to provide more detailed information.	MCS	30/9/25

A3/2025	<p>Obligation 191 (B2)</p> <p><i>Water Services Code of Practice (Family Violence) 2020 Clause 5(1)</i></p> <p>The licensee must have a family violence policy that sets out the matters specified in clause 5(1).</p> <ul style="list-style-type: none"> • Stantec considers that the policy alone does not fully address the matters specified in clause 5(1) of the code of practice leading to non-compliance with this obligation. 	<ul style="list-style-type: none"> • Include a family violence section in 'Our Customer Commitments' with a statement that Busselton Water will not request written evidence of family violence from a customer unless evidence is reasonably necessary to enable Busselton Water to assess appropriate debt management and recovery measures. 	Update BW's 'Our Customer Commitments' to include information regarding family violence.	MCS	30/9/25
A4/2025	<p>Obligation 197 (CN/R)</p> <p><i>Water Services Code of Practice (Family Violence) 2020 Clause 9</i></p> <p>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.</p> <ul style="list-style-type: none"> • There is no documented procedure for customer service staff to follow with respect to family violence cases. 	<ul style="list-style-type: none"> • A family violence procedure should be produced and included in the Customer Service Procedures manual to guide customer support staff when providing support to a customer affected by family violence. This procedure should address: – What information to provide (support services, complaint procedure, financial hardship) – When to provide the information – How information obtained will be protected – Allocation of a case manager 	Create a Family Violence Procedure to within the Procedure manuals to provide guidance on supporting vulnerable customers and outlining BW's obligations.	MCS	30/9/25