Recommendation Reference (no./year)	Compliance Manual Ref #	Non-compliance/Control Deficiency/Asset System Deficiency *((AMS Component/Effectiveness Criteria/Rating/Details)*	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target Completion date
1/2026	N/A	**Asset Operations** *Criteria 5.6: Staff resources are adequate and staff receive training commensurate with their responsibilities.* *Rating B3* (corrective action required (with processes that require some improvement); BWPS is currently implementing enhancements to its Training Management System (, following the identification that the system had not been fully configured to effectively manage training records for compliance, legislative, and health and safety competencies, as outlined in the Training Management Process Workflow Diagram. These system enhancements are scheduled for completion by July 2026. It was also noted that in some circumstances the business had defined a renewal requirement that was more frequent than the recommended renewal (example every two years rather than every three years), however it was inconsistently demonstrated that the internal renewal requirement was adhered to. The Auditor noted an absence of defined and structured reporting processes to monitor compliance rates against targets (e.g. 80% compliance for First Aid) and to identify and escalate compliance issues. Monthly and annual reports showed no evidence of BWPS management actively seeking or reviewing training statistics.	As planned, BWPS should prioritise the implementation of the enhancement to Training Management System to strengthen training governance, compliance monitoring, and reporting. This should include: a) Refresher Training Requirements: Clearly define and document refresher training requirements. b) Training Matrix Accuracy: Ensure the training matrix is reviewed and updated to reflect accurate, current training records, including completion and expiry dates as per renewal requirements as per action a. c) Mandatory Training and Compliance Targets: Define and document mandatory training requirements for all relevant roles, including clear compliance targets. d) Reporting and Oversight: Implement structured reporting of training compliance and performance metrics, including integration into monthly and annual reports to management and the Board. Reporting should highlight compliance against targets, identify gaps, and include clear follow-up actions and status updates.	Bluewaters will establish the following to address the Auditors' recommendations: a) Clarify training refresher requirements and define how to record that information. b) Update training matrix as per a) above, ensuring completion dates and expiry dates are accurately captured and maintained. c) Define and document mandatory training requirements for all relevant roles and establish training compliance targets for mandatory training. d) Establish compliance and performance metrics with Senior Managers. Include report against those metrics in monthly management reports, annual reports, and Board reporting. Reports will highlight compliance against targets, identify gaps, and include follow-up actions and status updates.	GM of P&C	a) March 2027 b) March 2027 c) March 2027 d) March 2027

Recommendation Reference (no./year)	Compliance Manual Ref #	**Non-compliance/Control Deficiency/Asset System Deficiency** *((AMS Component/Effectiveness Criteria/Rating/Details)*	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target Completion date
		A review of the current technical operator competency training matrix for Operations and Maintenance (O&M) personnel identified that it is being managed by the Site Management team using basic Excel spreadsheets. Based on documentation reviewed and discussions with the BWPS Training Coordinator, it is evident that the current training processes and performance require corrective action. The Insurers External auditors (March 2025) identified key training requirements for O&M personnel. However, there is no evidence to demonstrate that these requirements have been implemented. Specifically: • Emergency Response Training • Fire Warden Training • Basic site-specific operator competency training These requirements were either not reflected in the training matrix in the training Management System or had not been completed. In addition, no evidence was identified of refresher training being scheduled.		Recommendations 1/2026 a, b, c and d are not addressed solely by system enhancements. In addition, some of the required changes cannot be made within the current system. Bluewaters is working with the system provider to resolve these challenges. It may require an upgrade to a new online learning platform. March 2027 has been set as the target completion date to allow enough time to implement a solution and complete the relevant process updates and change management.		