

Audit and review report

2025 operational audit and asset management review of the Busselton Water Corporation



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ERAWA

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Executive Summary

Background

Busselton Water Corporation (t/a Busselton Water) holds an Operating Licence (WL3) which permits the provision of a potable water supply within the Busselton operating area. The operating licence was granted by the Economic Regulation Authority on 01 October 1996. The most current version of the licence, Version 10, was issued on 2 June 2021.

Stantec was commissioned by the Economic Regulation Authority of Western Australia (ERAWA) in January 2025 to undertake an audit and review of Busselton Water in accordance with Sections 24 and 25 of the Water Services Act 2012.

The purpose of the audit is to:

1. Assess Busselton Water's level of compliance against the conditions of its licence (Operational / Licence Audit)
2. Assess the effectiveness of measures implemented by Busselton Water for the proper management of assets used in the provision and operation of its services (Asset Management System Review).

This audit report outlines the findings of an audit of Busselton Water to fulfil the above objectives, conducted on 12-14 May 2025. The audit and review covered the operating period from 1 April 2022 to 31 March 2025.

Operational audit

The audit was carried out in accordance with the 2019 Audit and Review Guidelines: Water Licences, (August 2022).

Operational audit - status of previous findings

The previous Audit was conducted by PAXON in respect of the period 1 April 2019 to 31 March 2022. The 2022 audit and review report, dated March 2023, identified one instance of inadequate controls and/or non-compliance with individual obligations. The statuses of previous audit findings are provided in Table 1.

Table 1: Status of previous audit findings

Reference	Finding	Status
01/2022	BWC should ensure that any annual Tariff increases be notified in the public domain, via its website and also provided within its Customer Newsletter prior to the first bill which includes the new annual increased Tariff.	Resolved

Full details of findings from the previous Operational Audit are provided in Section 3.3.



Operational audit - findings from current audit

Issues identified during the current audit (with reference to the summary of recommendations in Section 3.4):

Water Services Code of Conduct (Customer Service Standards) 2024

1. A1/2025 - 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) (Obligation 154AA)

Water Services Code of Practice (Family Violence) 2020

2. A2/2025 - 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) (obligation 191).

Specifically, Stantec have identified the following gaps in the policy that will need to be addressed:

- 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
3. A3/2025 - 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 (Obligation 191).
 4. A4/2025 - 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 (Obligation 197).

Operational audit - effectiveness of controls

Stantec consider that Busselton Water generally has adequate controls in place that are appropriate to the nature and scale of its activities.

We observed one obligation (Obligation 197) where we consider that Busselton Water does not have effective controls. The obligations where inadequate controls were evident are related to items under:

- Water Services Code of Practice (Family Violence) 2020



Operational audit - overall compliance

The overall compliance of Busselton Water with its licence is summarised in Section 3.4 of this report. We observed that Busselton Water has been non-compliant over the course of the audit period with a total of four of its obligations (including non-compliances reported by Busselton Water to ERA). All other items were assessed as compliant or not able to be rated.

A summary of audit ratings for both controls and compliance across all obligations is presented in the following table.

Table 2: 2025 compliance and controls rating summary

		Compliance rating					
		1	2	3	4	N/R	Total
Controls rating	A	23	0	0	0	0	23
	B	4	4	0	0	0	8
	C	0	0	0	0	1	1
	D	0	0	0	0	0	0
	N/P	140	0	0	0	59	199
	Total	167	4	0	0	60	231

Busselton Water's representatives were cooperative throughout the audit and demonstrated an understanding of the importance and purpose of each licence obligation.



Asset management review

The asset management system review assessed the performance of Busselton Water against the key asset management processes and effectiveness criteria set out in the ERA Guidelines.

Asset management review - status of previous findings

The previous Review was conducted by PAXON in respect of the period 1 April 2019 to 31 March 2022. The 2022 audit and review report, dated March 2023, did not identify any recommendations.

Asset management review - findings from current review

Based on the observations and findings from our review of Busselton Water's asset management system effectiveness, we did not rate any of the asset management components at "C" for the process and policy and "3" for performance. Therefore, we have not needed to provide any recommendations in this audit report in accordance with the ERA's requirements.

We have identified a few improvement opportunities for some of Busselton Water's asset management processes and effectiveness criteria that received a rating other than those listed above. We have provided these suggestions directly to Busselton Water in accordance with the ERA's requirements.

Asset management review - control environment

We consider that Busselton Water has adequate controls in place for its asset management functions that are appropriate to the nature and scale of its activities.

Asset management review - overall effectiveness

A summary of our assessment of the effectiveness of Busselton Water's Asset Management System is provided in Section 4.4.

Based on our observations and finding during the review, we have assigned "A1" ratings to 11 of the 12 key processes reviewed. We have assigned an "A2" rating to the Review of AMS process. We do not consider that there are any asset management criteria that require substantial improvement or corrective action required.



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We have summarised our ratings of the effectiveness of the Busselton Water's asset management system in the following table.

Table 3: Summary of 2025 review ratings

Asset management process & effectiveness criteria	Asset management process and policy rating	Asset management performance rating
Asset planning	A	1
Asset creation/acquisition	A	1
Asset disposal	A	1
Environmental analysis	A	1
Asset operations	A	1
Asset maintenance	A	1
Asset management information system	A	1
Risk management	A	1
Contingency planning	A	1
Financial planning	A	1
Capital expenditure planning	A	1
Review of AMS	A	2



Acronyms

AMP	Asset Management Plan
CCTV	Closed-circuit television
Busselton Water	Busselton Water Corporation
DoH	Department of Health
DWER	Department of Water and Environmental Regulation
ERA	Economic Regulation Authority
LTFP	Long-Term Financial Plan
MoU	Memorandum of Understanding
OH&S	Occupational Health and Safety
SCADA	Supervisory control and data acquisition
SOP	Standard Operating Procedure



1 Introduction

1.1 Busselton Water

Busselton Water is a local water corporation based in Busselton, a major regional centre 220 kilometres south of Perth with a population of around 41,000 people. Busselton Water operates a potable water supply to an estimated 15,000 connected properties in accordance with an operating licence issued by the ERA.

The majority of Busselton Water's raw groundwater is drawn from the Yarragadee aquifer, a major freshwater resource for the South West region. A smaller volume of water is also abstracted from the base of the shallower Leederville aquifer. The potable water network consists of 9 bores, 3 water treatment plants, 5 storage tanks, and approximately 350 kilometres of water mains. Approximately 7 billion litres of potable water is supplied each year.

1.2 Operational audit and asset management review

The ERA is responsible for regulating the economic framework for water in Western Australia. Its primary objective is to ensure the provision of a competitive and fair environment, particularly where businesses operate as natural monopolies.

The ERA administers the licencing scheme for water licences under the *Water Services Act 2012* (the Act). Under the Act, licensees are obliged to provide an operational audit and asset management system review once every 24 months (or as otherwise required). The audit and review are to be undertaken by an independent expert. The ERA has responsibility for engaging an independent expert to undertake the audits and reviews.

Section 24 of the Act requires the licensees to have an Asset Management System in place that is independently reviewed. The ERA has published the 2019 Audit and Review Guidelines: Water Licences to inform independent experts on the requirements for undertaking Audits and Reviews. The latest version of the Guidelines was published in August 2022. The Guidelines set out the standard process for conducting audits and reviews, the scope of the audits and reviews, and the criteria for determining the effectiveness (or otherwise) of the asset management system. The previous review was completed in 2022.

Section 25 of the Act requires the licensee to provide the ERA with an independent operational audit as per the 2019 Audit and Review Guidelines. The previous audit was completed in conjunction with the previous review in 2022.

1.3 Purpose of this report

As a condition of the water licence, licensees are required to conduct an operational audit and asset management review that assesses the performance of the licensee against its obligations under the licence.

The purpose of the operational audit is to assess the effectiveness of measures taken by the licensee to meet the conditions referred to in the licence including the legislative obligations called up by the



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Scope of work

licence. The scope of the audit report includes assessing the adequacy and effectiveness of performance against the requirements of the licensee by considering:

- process compliance
- outcome compliance
- output compliance
- integrity of reporting
- compliance with any individual license conditions

The purpose of the asset management review is to assess the licensee's asset management system, which includes the asset management plan, and the staff and IT resources that support the plan. The scope of the review includes an assessment of the adequacy and effectiveness of the licensee's asset management system by evaluating the asset management processes set out in Section 4.1.

Busselton Water's water services licence number is WL3. Version 10 of WL3 is the current licence and was issued on 12 June 2021. The last audit of the operating licence and review of the asset management system for Busselton Water covered the period from 1 April 2019 to 31 March 2022. The report was finalised in March 2023. In accordance with the conditions set by the ERA, an audit that covers the period from 1 April 2022 to 31 March 2025 is required to be prepared and submitted to the ERA by 30 May 2025.

2 Scope of work

2.1 Objectives and approach

The objectives of this audit and review were to provide the Authority with:

1. An independent assessment of Busselton Water's compliance with all relevant obligations under the licence
2. An independent assessment of the effectiveness of Busselton Water's asset management system in relation to WL3
3. Recommendations to address any non-compliances

The audit was undertaken in accordance with ASAE3000. The scrutiny level (as per ASAE 3000) for the audit was a reasonable assurance engagement. The review was a limited assurance engagement.

Our approach to the reporting work was to work closely with the licensee so that comments and challenges could be responded to and addressed before the audit report was finalised.

The key areas of our approach included:

- Preparation of an audit and review plan. The plan identified the number and location of meetings, the information to be addressed and the auditor responsible. We aimed to design an effective and efficient program.
- A start-up discussion (by telephone or video conference) with Busselton Water to:
 - Discuss the main issues to be addressed
 - Identify any issues from the previous audit and review



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- Identify any new issues arising from changes to the Licence or operating environment requirements
- Discuss the plan
- Confirm timing of key milestones such as site visit
- On site work comprising:
 - Start-up meeting
 - Face-to-face interviews with business staff responsible for the relevant areas
 - Demonstration of key systems
 - Sample testing for outcome compliance (assessing a sample of documents to confirm procedures / policies are followed and implemented)
 - Review the breach register and any non-compliances and assess if any corrective action was undertaken and its effectiveness
 - Inspection of the licensee's assets including, main office, plant 2 (including monthly toolbox meeting) bore 14 and treatment works, plus depot and storage area.
 - Preliminary feedback at the audit and review close-out meeting
- Preparation of an audit and review report that complies with the format prescribed in Chapter 5 of the 2019 Audit and Review Guidelines - Water Licences, for submission to the ERA.

Our methodology for completing this audit assignment was based on:

- A risk assessment that determined the priority of each audit area, using the risk management framework in Appendix 3 of the 2019 Audit and Review Guidelines
- Our understanding of the licensee's business
- The experience of our audit team in undertaking regulatory audits which has been gained in several jurisdictions in Australia
- The outcome of the previous audit completed of Busselton Water
- Our audit methodology, including the key documents required to be reviewed and the supporting systems that we requested to see demonstrated, is detailed in the Audit and Review Plan

2.2 Time period covered by the audit/review

This audit and review cover the period from 1st April 2022 to 31st March 2025.

The audit/review commenced in April 2025 with preparation of the Audit and Review Plan which was approved in writing by the ERA on 12th May 2025.

Interviews with Busselton Water staff were carried out from 12th to 14th May 2025 at Busselton Water's offices in Busselton, WA.

2.3 Licensee representatives

Details of representatives from Busselton Water who participated in the audit and review process are provided in Table 4.



Table 4: Licensee representative details

Name	Organisation	Role
Stacey Hamilton	Busselton Water	General manager operations and planning
Chris Temple	Busselton Water	Manager assets and planning
Shanice Merredith	Busselton Water	Manager customer service
Tracie Bishop	Busselton Water	General manager corporate and finance
Nadine Dwyer	Busselton Water	Compliance and risk officer
Keith Mungham	Busselton Water	Asset information officer
Jenny Mathies	Busselton Water	Field services officer
Peter Campbell Hicks	Busselton Water	Development services planner
Brad Sheldrick	Busselton Water	People and safety coordinator
Shannon Dempster	Busselton Water	Team leader networks
Kris Griffin	Busselton Water	Water treatment plant operator
Joshua Friis	Busselton Water	Project officer

2.4 Auditor details

The audit/review team comprised two staff members from Stantec. Details of their roles and hours utilised in the audit/review process are provided in Table 5.

Table 5: Auditor team member details

Name	Organisation	Role	Hours Utilised
Patrick Lamb	Stantec	Auditor and Project manager	12
Brad Thompson	Stantec	Lead auditor	168

2.5 Deviations from the audit and review plan

The audit and review plan identified a selection of sites to be visited during the audit. Stantec were able to obtain reasonable assurance of the adequacy and effectiveness of Busselton Water's asset management system from visiting their corporate office, plant 2, bore 14 and attending the monthly toolbox meeting with treatment and distribution teams. The following sites were not visited:

- VSD project (Bores 14, 16 and 17)
- Solar power project (Plants 1, 3 and 11)
- Mains replacement (Caves Rd)

The following table lists the deviations from the approved audit and review plan.



Table 6: Deviations from audit plan

Ref No.	Licence reference & Summary of licence obligation	Audit priority	Deviation
147 (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 49(3)</i> The licensee's complaints procedure must provide for the matters specified in relation to lodgement of complaints, acknowledging complaints, responding to complaints, and dispute resolution arrangements.	2	Added a 2024 specific version of obligation 147 to capture the additional requirement for acknowledging complaints
170A	<i>Licence Condition Clause 5.1.2 (a), (b)</i> The licensee must notify the ERA of the details of the asset management system within five business days from the later of: a) the commencement date; or the completion of construction of the licensee's water service works.	3	- This obligation relates to licence condition 5.1.2 (a), (b). - However, WL3, version 10, as issued on 02 June 2021 specifically records clause 5.1.2 as "Not used". - Therefore, this obligation is not applicable.

3 Operational audit

3.1 Audit overview

Stantec held a preliminary meeting to prepare for the audit with Busselton Water on 14th April and conducted the audit onsite from 12-14 May. Requests for additional information followed the audit, and Busselton Water was cooperative and responsive.

3.2 Operational audit scope

The scope of the audit encompassed an assessment of the adequacy and effectiveness of performance of the licensee 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 (specifically, proper records which provide assurance that procedures are consistently followed, and controls are maintained).
- Integrity of reporting: the completeness and accuracy of the compliance and performance reports provided to the ERA.
- Compliance with any individual licence conditions: the actual performance against the requirements imposed on the specific licensee by the ERA or specific matters raised by the ERA.



The scope of works of this audit included:

- Interviews with key staff members from Busselton Water to:
 - » Assess findings from the last audit and review the actions taken to address the recommendations from the previous audit / review
 - » Assess performance against licence conditions for WL3
 - » Assess performance against each asset management process for WL3
- Review of documents, procedures and policy manuals in relation to financial management and planning, service performance standards, asset management, operations and maintenance functions and reporting
- Inspection of a sample of Busselton Water assets used to provide the licensed services covered by WL3
- Testing and assessment to determine whether the procedures and policies are followed and determine its effectiveness
- Preparation of an audit report in accordance with the format outlined in the 2019 Audit and Review Guidelines: Water Licences (Aug 2022).

The following key documents were reviewed as part of the audit and review process:

- Annual Reports (2021/2022, 2022/2023 and 2023/2024)
- Compliance reports (2021/2022, 2022/2023 and 2023/2024)
- Performance reports (2021/2022, 2022/2023 and 2023/2024)
- Our Customer Commitments
- Policy Statement Manual
- Family Violence Policy
- Financial Hardship Policy
- P10 Customer Service procedures manual
- P11 Land development procedures manual
- P18 Asset Management procedures manual
- Operations and planning work instruction manual

3.2.1 Operational audit excluded conditions

Some of the reporting obligations for sewerage services and water supply have been excluded from the audit because they are not applicable to Busselton Water. These are detailed in Table 7.



Table 7: Excluded conditions

Water Compliance Reporting Manual requirement	Reference¹	Reason for exclusion
14	Water Services Act Section 60	Busselton Water is not a supplier of last resort
17	Water Services Act Sections 82(4) and (5)	This obligation does not apply to Busselton Water (see regulation 28 of the Water Services Regulations 2013)
24, 25	Water Services Act Section 98(3) and 106(2)	Busselton Water does not provide sewage services under its Operating Licence
26, 27	Water Services Act Section 110(3) and 112(5)	Busselton Water does not provide drainage services under its Operating Licence
127	Water Services Code of Conduct (Customer Service Standards) 2024 32(5)	This obligation has already been met and is no longer applicable
140, 141, 143	Water Services Code of Conduct (Customer Service Standards) 2024 44(2), 44(3), 44(4)	These obligations only apply to Water Corporation
181	Water Services Act Section 12	Busselton Water is not a supplier of last resort
184A, 184B	Water Services Act Section 12	Busselton Water does not provide sewage services under its Operating Licence
190D	Water Services Act Section 12	Busselton Water does not provide drainage services under its Operating Licence
190E-190G	Water Services Act Section 12	Busselton Water does not provide irrigation services under its Operating Licence
190H, 190I	Water Services Act Section 12	This obligation only applies to Water Corporation
196	Water Services Code of Practice (Family Violence) 2020 Clause 8(2)	Busselton Water is a government organisation according to the State Records Act 2000

3.2.2 Areas of special focus

The new Water Services Code of Conduct (Customer Service Standards) 2024 (Code of Conduct) commenced on 1 July 2024. The updated Code of Conduct introduced new protections for potable water, including the requirement for licensees to provide all residential customers with access to interest-free and fee-free payment plans. The requirements for managing customer complaints were also updated.

The ERA has nominated the obligations listed in Table 8 to ensure Busselton Water has revised its processes.

¹ There were two different versions of the Water Services Code of Conduct (Customer Service Standards) in force during the period of the audit and therefore some of the numbering for the clauses are different in the 2024 code as compared to the 2018 code. The references in this table referred to the 2018 reference numbering and the correct numbering for 2024 can be found in the 2024 Water Compliance Reporting Manual.



Table 8: Areas of special focus

Area	Water Compliance Reporting Manual – July 2024
Payment assistance	Obligation 123A
Payment plans	Obligations 124D and 124E
Variation of payment plans	Obligations 124G, 124H, 124I and 124J
Procedure for dealing with complaints about water services	Obligations 146 and 147



3.3 Previous audit non-compliances and recommendations

Details of the actions completed by Busselton Water against each of the previous operational licence audit non-compliance and recommendations are presented in Table 9. We confirm that all non-compliances and recommendations from the 2022 audit have been resolved.

Table 9: Resolved non-compliances and recommendations from the previous audit

A. Resolved during current audit period				
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	Date resolved	Further action required (Yes/No/Not applicable) Details of further action required (including current recommendation reference if applicable)
01/2022	Obligation 117A (rating B3) <i>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).</i> This obligation was not met in part, and was a finding in the previous Operational Review, recommendation 03/2019. BWC had no Tariff increases between 2019-20 and 2020-21, but an increase in 2021-22. This increase should have been advised in October 2021 newsletter. It was advised via its website and via the customer's invoice.	BWC should ensure that any annual Tariff increases be notified in the public domain, via its website and also provided within its Customer Newsletter prior to the first bill which includes the new annual increased Tariff.	June 2024	No further action required.



3.4 Audit controls and compliance summary

The findings of the operational audit are summarised in Table 10 with adequacy of control and compliance rating. The table includes all applicable compliance reporting items and are numbered according to the Water Compliance Reporting Manual, October 2021 and the July 2024 revision.

In accordance with the Audit Guidelines, an assessment of the performance of Busselton Water was completed using the rating scale in Appendix A.1 and asset management system effectiveness using the rating scales in Appendix A.2.

Table 10 provides a summary of Busselton Water's compliance rating against each licence obligation, and an adequacy of controls rating where the item has been found to be non-compliant.

- N/P = No relevant activity was performed during the audit period and a controls rating is not required
- N/R = Not rated - No relevant activity took place during the audit period; therefore, it is not possible to assess compliance

Table 10: Audit performance summary

Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
1	Water Services Act Section 21(1)(a)	2	✓					✓				
2	Water Services Act Section 21(1)(b)	4					✓					✓
3	Water Services Act Section 21(1)(b)	4					✓	✓				
4	Water Services Act Section 22	4					✓					✓
5	Water Services Act Section 23	4					✓	✓				
6 (2021)	Water Services Act Sections 24(1)(a) & 24(2)	4					✓	✓				
6 (2024)	Water Services Act Sections 24(1)(a)	4					✓	✓				
8	Water Services Act Section 24(1)(c)	4					✓	✓				
8A (2024)	Water Services Act Section 24(2)	4					✓	✓				
9	Water Services Act Section 25	4					✓	✓				
10	Water Services Act Section 26(3)	4					✓	✓				
13	Water Services Act Section 36	4					✓					✓



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
15	Water Services Act Section 70(2)	4					✓	✓				
16	Water Services Act Section 77(3)	4					✓	✓				
18	Water Services Act Section 84(2)	4					✓					✓
19	Water Services Act Section 87(2)	4					✓					✓
20	Water Services Act Section 90(7)	5					✓					✓
21	Water Services Act Section 95(3)	2	✓					✓				
22	Water Services Act Section 96(1)	4					✓	✓				
23	Water Services Act Section 96(5)	5					✓					✓
28	Water Services Act Section 119(2)	4					✓	✓				
29	Water Services Act Section 122(2)	4					✓					✓
30	Water Services Act Section 125(2)	4					✓	✓				
31	Water Services Act Section 128(4)	4					✓					✓
32	Water Services Act Section 129(5)	4					✓	✓				
33	Water Services Act Section 139(3)	5					✓	✓				
34	Water Services Act Section 141(1)	4					✓	✓				
35	Water Services Act Sections 142	4					✓					✓
36	Water Services Act Sections 143(2)	4					✓					✓
37	Water Services Act Sections 143(3)	4					✓					✓
38	Water Services Act Sections 144(3)	4					✓					✓
39	Water Services Act Section 145(2)	4					✓					✓
40	Water Services Act Section 147(3)	4					✓					✓
41	Water Services Act Section 147(4)	4					✓					✓



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
42	Water Services Act Section 151(1)	4					✓	✓				
43	Water Services Act Section 151(2)	4					✓	✓				
44	Water Services Act Section 152(3)	4					✓					✓
45	Water Services Act Section 153(3)	4					✓	✓				
45A (2024)	Water Services Act Section 160(1)	4					✓	✓				
46	Water Services Act Section 166(5)	4					✓					✓
47	Water Services Act Section 166(6)	4					✓					✓
48	Water Services Act Section 170	4					✓					✓
49	Water Services Act Section 173(4)	4					✓	✓				
50	Water Services Act Section 174(1)	4					✓	✓				
51	Water Services Act Section 174(3)	4					✓	✓				
52	Water Services Act Section 175(2)	4					✓	✓				
53	Water Services Act Section 175(5)	4					✓					✓
54	Water Services Act Section 176(1)	4					✓					✓
55	Water Services Act Section 176(3)	4					✓					✓
56	Water Services Act Section 176(4)	4					✓					✓
57	Water Services Act Section 181	5					✓	✓				
58	Water Services Act Section 186	4					✓					✓
59	Water Services Act Section 187(1) – (3)	4					✓					✓
60	Water Services Act Section 190(4)	4					✓					✓
61	Water Services Act Section 190(5)	4					✓					✓
62	Water Services Act Section 210(5)	4					✓					✓



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
63	Water Services Act Section 218(2)	5					✓					✓
64	Water Services Act Section 218(3)	4					✓					✓
65	Water Services Regulations 2013 Regulation 23(2)	4					✓					✓
66	Water Services Regulations 2013 Regulation 24(4)	4					✓	✓				
67	Water Services Regulations 2013 Regulations 26(3)	4					✓	✓				
68	Water Services Regulations 2013 Regulation 26(5)	4					✓	✓				
69	Water Services Regulations 2013 Regulation 29(1)	4					✓	✓				
70	Water Services Regulations 2013 Regulation 42(2)	4					✓	✓				
71	Water Services Regulations 2013 Regulation 43(3)	4					✓	✓				
72	Water Services Regulations 2013 Regulation 43(6)	4					✓	✓				
74	Water Services Regulations 2013 Regulation 60(2)	4					✓					✓
75	Water Services Regulations 2013 Regulation 63	4					✓	✓				
76	Water Services Regulations 2013 Regulation 65(1)	4					✓	✓				
77	Water Services Regulations 2013 Regulation 65(2)	4					✓	✓				
78	Water Services Regulations 2013 Regulation 65(4)	4					✓					✓
78A	Water Services Regulations 2013 Regulations 65(5) and 65(6)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
79	Water Services Regulations 2013 Regulation 67	4					✓	✓				
80	Water Services Regulations 2013 Regulation 68(5)	5					✓					✓
81	Water Services Regulations 2013 Regulation 68(6)	4					✓					✓
82	Water Services Regulations 2013 Regulation 68(7)	4					✓					✓
83	Water Services Regulations 2013 Regulation 68(8)	4					✓					✓
84	Water Services Regulations 2013 Regulation 69(3)	4					✓					✓
85	Water Services Regulations 2013 Regulation 70(2)	4					✓					✓
86	Water Services Regulations 2013 Regulation 74(1)	4					✓					✓
87	Water Services Regulations 2013 Regulation 74(2)	4					✓					✓
88	Water Services Regulations 2013 Regulation 75(1)	4					✓	✓				
88A	Water Services Regulations 2013 Regulation 80H	4					✓					✓
89	Water Services Regulations 2013 Regulation 85	4					✓	✓				
90	Water Services Regulations 2013 Regulation 86(6)	4					✓					✓
91	Water Services Regulations 2013 Regulation 86(9)	4					✓					✓
92	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 8(1)-(3)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
93	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 9(2) and (4)	4					✓	✓				
94	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 10(2)	4					✓	✓				
95	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(2)	4					✓	✓				
96	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(3)	4					✓	✓				
97	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(4)	4					✓	✓				
98	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(5)	4					✓	✓				
98A	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(6)	4					✓	✓				
99 (2021)	Water Services Code of Conduct (Customer Service Standards) 2018	4					✓	✓				
99 (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(3)	4					✓	✓				
99A (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(1)	4					✓	✓				
99B (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(2)	4					✓	✓				
99C (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(4)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
99D (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(5)	4					✓	✓				
100	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(1) and 2024 Clause 13(2)	4					✓	✓				
100A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(3) and 2024 Clause 13(7)	4					✓	✓				
101	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(4) and 2024 Clause 13(3)	4					✓	✓				
101A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(5) and 2024 Clause 13(4)	4					✓	✓				
102A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(6) and 2024 Clause 13(5)	4					✓	✓				
103	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 14(1)	4					✓	✓				
104	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 14(2)	4					✓	✓				
104A	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 15(3)	4					✓	✓				
105	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 16(1)	4					✓	✓				
106	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 17(2) and (3)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
107	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 18(2)	4					✓					✓
108	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 18(3)	3	✓					✓				
109 (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(4)	3	✓					✓				
109 (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 18(4)	3	✓					✓				
110	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 18(5)	3	✓					✓				
111A	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 19(2)	4					✓	✓				
112A	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 19(3)	4		✓				✓				
112B	Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 19(4)	4		✓				✓				
112C (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(5)	4					✓	✓				
112C (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 19(5)	4					✓	✓				
113	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(1) and 2024 Clause 21(1)	4					✓	✓				
113A (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 21(2)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
113B (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 21(3)	4					✓					✓
114	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(2) and 2024 Clause 22(1)	4					✓	✓				
115	Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 20(3) & (6) and 2024 Clauses 22(2) & (4)	4					✓	✓				
116 (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(4)	4					✓	✓				
116 (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 22(3)	4					✓	✓				
117 (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(5)	4					✓	✓				
117A (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 21	2	✓					✓				
117A (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 20(1)	2	✓					✓				
118	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 23 and 2024 Clause 24	4					✓	✓				
119	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 24(1) and 2024 Clause 25(1)	4					✓	✓				
120	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 24(2) and 2024 Clause 25(2)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
121 (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 25(1)	4					✓	✓				
121 (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 26	4					✓	✓				
122	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 26(1) and 2024 Clause 27(1)	4					✓	✓				
123	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 27 and 2024 Clause 28	4					✓	✓				
123A (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 29(1)-(2)	<u>2</u>	✓					✓				
124A (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(2)	4					✓	✓				
124B (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(3)	4					✓	✓				
124B (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(1)	4					✓	✓				
124C (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(4)	4					✓	✓				
124D (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(4)	<u>2</u>	✓					✓				
124E (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(6)	<u>2</u>	✓					✓				
124F (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(7)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
124G (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 31(1)	2	✓					✓				
124H (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 31(2)	2	✓					✓				
124I (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 31(3)	2	✓					✓				
124J (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clauses 31(4) and (5)	2	✓					✓				
125	Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 29(1) & (2) and 2024 Clauses 32(1) and (2)	4					✓	✓				
126A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(3) and 2024 Clause 32(3)	4					✓	✓				
126B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(4) and 2024 Clause 32(4)	4					✓	✓				
128	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(6) and 2024 Clause 32(6)	4					✓	✓				
129A (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(7)	4					✓	✓				
129B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(8) and 2024 Clause 32(7)	4					✓	✓				
129C (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(9)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
129C (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 32(8)	4					✓					✓
130A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(2) and 2024 Clause 33(2)	4					✓	✓				
130B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(3) and 2024 Clause 33(3)	4					✓	✓				
131A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(a) and 2024 Clause 33(4)(a)	4					✓	✓				
131B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(b) and 2024 Clause 33(4)(b)	4					✓	✓				
131C	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(c) and 2024 Clause 33(4)(c)	4					✓	✓				
133	Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 31(4) & (5) and 2024 Clauses 34(4) and (5)	4					✓	✓				
133A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 32 and 2024 Clause 35	4					✓	✓				
134 (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 33(1)(a)-(c)	4					✓	✓				
134 (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 36(1)(a)-(c)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
134A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 33(1)(d)-(e) and 2024 Clause 36(1)(d)-(e) and 2024 Clause 44(6)	4					✓	✓				
135	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 40(1) and 2024 Clause 43(1)	4					✓	✓				
136	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 40(2) and 2024 Clause 43(2)	4					✓	✓				
137A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(1) and 2024 Clause 39(1)	4					✓	✓				
137B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 39(2) and 2024 Clause 36(2)	4					✓	✓				
137C	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(3) and 2024 Clause 39(3)	4					✓	✓				
138	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 37(1)(a) and (e) and 2024 Clause 40(1)(a) and (c)-(h)	4					✓	✓				
138B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 38 and 2024 Clause 41	4					✓	✓				
139	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 39 and 2024 Clause 42	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
142	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(4) and 2024 Clause 44(5)	4					✓	✓				
144	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(6) and 2024 Clause 44(6)	4					✓	✓				
144A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 43(1) and 2024 Clause 46(1)	4					✓	✓				
144B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 43(2) and 2024 Clause 46(2)	4					✓	✓				
144C	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 44(1) and 2024 Clause 47(1)	4					✓	✓				
144D	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 44(2) and 2024 Clause 47(2)	4					✓	✓				
144E	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 45 and 2024 Clause 48	4					✓	✓				
145	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(1) and 2024 Clause 49(1)	4					✓	✓				
146	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(2) and 2024 Clause 49(2)	2	✓					✓				
147 (2021)	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(3)	2	✓					✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
147 (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 49(3)	2		✓				✓				
148A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(4) and 2024 Clause 49(4)	4					✓	✓				
149	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(5) and 2024 Clause 49(5)	4					✓	✓				
149A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 47 and 2024 Clause 50	2		✓					✓			
150	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 48(1) and 2024 Clause 51(1)	4					✓	✓				
152	Water Services Code of Conduct (Customer Service Standards) 2013 Clause 48(2) and 2024 Clause 51(2) and (3)	4		✓				✓				
153	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(1) and 2024 Clause 52(1)	4					✓	✓				
154	Water Services Code of Conduct (Customer Service Standards) 2013 Clause 49(2) and 2024 Clause 52(2)	4					✓	✓				
154AA (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 52(3)	4		✓					✓			
154A	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(3) and 2024 Clause 52(4)	4					✓	✓				



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
154B	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 51(1) & (3) and 2024 Clause 54(2)	4					✓	✓				
154CC (2024)	Water Services Code of Conduct (Customer Service Standards) 2024 Clause 54(3)	4					✓					✓
154C	Water Services Code of Conduct (Customer Service Standards) 20218 Clause 52 and 2024 Clause 55	2	✓					✓				
154D	Water Services Code of Conduct (Customer Service Standards) 2018 Clause 53 and 2024 Clause 56	4					✓	✓				
155	Licence Condition Clause 4.2.1	4					✓	✓				
159	Licence Condition Clause 4.1.2	4					✓					✓
160	Licence Condition Clause 4.6.1	4					✓	✓				
161	Licence Condition Clause 5.2.1	4					✓					✓
162	Licence Condition Clause 5.3.4	4					✓	✓				
163	Licence Condition Clauses 4.7.1(a), (b), (c)	4					✓					✓
165	Licence Condition Clause 4.8.1	2		✓					✓			
167	Licence Condition Clause 4.8.2	4					✓	✓				
168	Licence Condition Clauses 3.8.1 and 3.8.2	4					✓					✓
169	Licence Condition Clause 3.7.1	4					✓	✓				
171	Licence Condition Clause 5.1.3	3					✓					✓
172	Licence Condition Clause 5.1.7	4					✓	✓				
172A	Licence Condition Clause 6.1.1	4					✓					✓



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
172B	Licence Condition Clause 6.1.2	4					✓	✓				
182	Licence Condition Clause 4.4.1(b)	4					✓					✓
184	Licence Condition Clause 7.1.1	4					✓	✓				
185	Licence Condition Clause 7.1.4	4					✓	✓				
186	Licence Condition Clause 7.1.5	4					✓	✓				
187	Licence Condition Clause 7.1.6	4					✓	✓				
188	Licence Condition Clause 7.1.7	4					✓					✓
189	Licence Condition Clause 7.1.8	4					✓	✓				
190 (2021)	Licence Condition Schedule 2	4					✓	✓				
190A (2024)	Licence Condition Schedule 2 Clause 1.1	4					✓	✓				
190B (2024)	Licence Condition Clause Schedule 2 Clause 1.2	4					✓					✓
190C (2024)	Licence Condition Clause Schedule 2 Clause 1.3	4					✓					✓
191	Water Services Code of Practice (Family Violence) 2020 Clause 5(1)	1		✓					✓			
192	Water Services Code of Practice (Family Violence) 2020 Clause 5(2)	2	✓					✓				
193	Water Services Code of Practice (Family Violence) 2020 Clause 6	2	✓					✓				
194	Water Services Code of Practice (Family Violence) 2020 Clause 7	2	✓					✓				
195	Water Services Code of Practice (Family Violence) 2020 Clause 8(1)	2	✓					✓				
197	Water Services Code of Practice (Family Violence) 2020 Clause 9	2			✓							✓



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Licence obligation ref no. (Refer to the Water Compliance Reporting Manual)	Licence obligation	Audit Priority applied [rated 1 (Highest) to 5 (Lowest)]	Controls Rating (Refer to the 4-point rating scale in Appendix A.1 for details)					Compliance Rating (Refer to the 4-point rating scale in Appendix A.1 for details)				
			A	B	C	D	N/P	1	2	3	4	N/R
198	Water Services Code of Practice (Family Violence) 2020 Clause 10	2	✓					✓				



3.5 Detailed audit observations

Table 11: Operational audit observations

Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
Water Services Act 2012					
1	Water Services Act Section 21(1)(a) The licensee must provide a water service authorised by the licence to persons entitled to the service under the Act, except to the extent otherwise provided for by the Act.	2	- Stantec confirmed that Busselton Water supplied water to all eligible customers in the township of Busselton and surrounding area. - Bulk water is also supplied to the Water Corporation facility at Quindalup for distribution to the township of Dunsborough and surrounding area.	A	1
2	<i>Water Services Act Section 21(1)(b)</i> 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	Stantec confirmed that Busselton Water was not requested to provide any additional services within the operating area during the audit period. Consequently, this obligation is not rated.	N/P	N/R
3	<i>Water Services Act Section 21(1)(c)</i> The licensee must provide, operate and maintain the water service works specified by the ERA in the licence for the purposes of section 11(3).	4	Stantec confirmed the operation and maintenance of the water service works. This is primarily documented in the Operations and Planning Work Instruction Manual.	N/P	1
4	<i>Water Services Act Section 22</i> 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 operating area of the licence extends well beyond the area currently serviced by Busselton Water. - Stantec has confirmed with Busselton Water representatives that water services were not provided outside the licenced operating area. Consequently, this obligation is not rated.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
5	<i>Water Services Act Section 23</i> 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	Stantec confirmed with Busselton Water representatives and review of key documents (e.g. Annual Reports) that this obligation is met.	N/P	1
6 (2021)	<i>Water Services Act Sections 24(1)(a) & 24(2)</i> The licensee must provide for an asset management system in respect of the licensee's water service works.	4	- Stantec confirmed that Busselton Water has an asset management system in place as documented in their Asset Management Framework and associated artefacts. - Busselton Water, as a Western Australian Government Agency, has an asset management system that satisfies the WA government Strategic Asset Management Framework (SAMF).	N/P	1
6 (2024)	<i>Water Services Act Sections 24(1)(a)</i> The licensee must provide for an asset management system in respect of the licensee's water service works.	4	- Stantec confirmed that Busselton Water has an asset management system in place as documented in their Asset Management Framework and associated artefacts. - Busselton Water, as a Western Australian Government Agency, has an asset management system that satisfies the WA government Strategic Asset Management Framework (SAMF).	N/P	1
8	<i>Water Services Act Section 24(1)(c)</i> 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	- Stantec confirmed that an independent review of Busselton Water's asset management system was conducted by PAXON and reported to ERA in March 2023. - The current review period is 36 months.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
8A (2024)	<i>Water Services Act Section 24(2)</i> The licensee's asset management system must include the measures to be taken by the licensee for the proper maintenance of the water service works and the provision and operation of the water service works, and other water service works necessary for the provision of the water service.	4	- Stantec confirmed that the required maintenance measures are documented in the Operations and Planning Work Instruction Manual (OPWIM). These measures reflect the objectives defined in the Strategic Asset Plan (SAP). - Stantec also confirmed the application of these measures with the CONFIRM computerised maintenance management system (CMMS).	N/P	1
9	<i>Water Services Act Section 25</i> 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	- Stantec confirmed that an independent operational audit of Busselton Water's asset management system was conducted by PAXON and reported to ERA in March 2023. - The current audit period is 36 months.	N/P	1
10	<i>Water Services Act Section 26(3)</i> 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 only applicable code of practice is the Water Services Code of Practice (Family Violence) 2020 which came into effect during the previous audit period. - Stantec confirm that Busselton Water has complied with this obligation by having a Family Violence policy in place. - Refer obligations 191 – 197 for a detailed observations regarding compliance against this code of practice.	N/P	1
13	<i>Water Services Act Section 36</i> 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 remove any part of the works except with the approval of the Minister.	4	Stantec confirmed with Busselton Water's Manager Assets and Planning that there was no instance where water services were ceased in an area. Consequently, this obligation is not rated.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
15	<i>Water Services Act Section 70(2)</i> The licensee must not supply water services to customers unless the licensee: • 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	• Stantec has confirmed that Busselton Water is a member of the water services ombudsman scheme through discussions with the Customer Service Manager and by reviewing the Energy and Water Ombudsman website and annual reports covering the audit period.	N/P	1



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16	<i>Water Services Act Section 77(3)</i> The licensee must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for.	4	- Stantec confirms that reasonable steps are taken to minimise the extent or duration of interruptions to service, as evidenced by the following observed processes. - Water service interruptions are recorded in Busselton Water's asset information management system and monitored via the Interrupted Supply Data spreadsheet for monthly reporting. - The P10 Customer Service - Procedures outlines how Busselton Water manages both planned and unplanned interruptions. This is reinforced by public notices such as the Bower Road - Notice regarding interruption to water supply, which demonstrates proactive communication and mitigation strategies during scheduled maintenance. - The Busselton Water Operational Incident Register documents real-time responses to service disruptions, including equipment failures and emergency repairs. It shows that Busselton Water tracks incidents closely and implements corrective actions promptly to restore service. Additionally, the General Manager Operations and Planning Monthly Report includes metrics such as the average duration of unplanned interruptions (Actual YTD 44.97 minutes per customer) indicating ongoing performance monitoring. - Furthermore, the GMOP Monthly Report provides continuity of supply performance data and counts the number of interruptions. Interruptions >1 hour are highlighted. - The Asset Management Framework 2025 and Strategic Asset Plan (Final) describe long-term investments in infrastructure resilience, including pressure management and system upgrades aimed at reducing failures and service disruptions. - Busselton Water maintains a dedicated Service Interruptions page on its website. This page provides real-time updates on planned and	N/P	1
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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
			unplanned outages and encourages customers to report issues promptly. - Busselton Water's commitment to this obligation is outlined in their customer charter 'Our Customer Commitments', which states: <i>We make every effort to minimise interruption to your residential water supply, but on occasion we need to carry out planned or unplanned (e.g. bursts pipes) maintenance on our services. When this occurs we do our best to limit the interruption.</i>		
18	<i>Water Services Act Section 84(2)</i> 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	- Stantec confirmed with Development Service Officer that appropriate policy, procedures and notice templates are in place to meet this obligation. A sample compliance letter was sighted. - Stantec confirmed with General Manager Operations and Planning that no compliance notices were issued during the audit period. Consequently, this obligation has not been rated.	N/P	N/R
19	<i>Water Services Act Section 87(2)</i> 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	Stantec confirmed with Busselton Water representatives that no applications were made to the State Administrative Tribunal during the audit period. A search of the eCourts Portal of WA for cases involving Busselton Water did not return any results. Consequently, this obligation is not rated.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
20	<i>Water Services Act Section 90(7)</i> If the licensee gives a compliance notice to a person who is undertaking construction or carrying out similar works in the vicinity of water service works, the licensee must, to the extent practicable, consult with the owner of the land on which the obstruction is located or the activity is taking place if the person to be given the notice is not the owner of the land.	5	Stantec confirmed with Busselton Water representatives that there were no contraventions that had any impact on the water service works. Consequently, this obligation is not rated.	N/P	N/R
21	<i>Water Services Act Section 95(3)</i> The licensee cannot cut off the supply of water to an occupied dwelling unless the occupier agrees to that.	2	- Stantec confirmed that Busselton Water has the required policy and procedures in place to ensure compliance with this obligation. This includes the Customer Service procedure (P10.PR01). - The customer charter 'Our Customer Commitments' reinforces Busselton Water's commitment to seek the dwelling occupier's agreement before cutting off supply to a dwelling. - Stantec confirmed with General Manager Operations and Planning that supply was not disconnected from any occupied dwellings during the audit period.	A	1
22	<i>Water Services Act Section 96(1)</i> 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	Stantec confirmed with the Development Service Planner that FESA requirements are complied with. Requirements are documented in the Pipeline Construction and Design Standards 2023 to be followed by developers. This is supported by the Design and Construction Guidelines which includes a final inspection of works to confirm compliance with the design standards.	N/P	1
23	<i>Water Services Act Section 96(5)</i> 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.	5	Stantec confirmed with Manager Assets and Planning that no requests were received during the audit period. Consequently, this obligation is not rated.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
28	<i>Water Services Act Section 119(2)</i> The licensee must include the information specified in a compliance notice given in relation to the matters set out in section 119(1).	4	Stantec confirmed this obligation is met by reviewing a sample compliance notice issued to a developer by the Development Services Planner. The notice described the non-compliance, the required remedy and timeframe.	N/P	1
29	<i>Water Services Act Section 122(2)</i> 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	Stantec confirmed with Busselton Water representatives that no applications were made to the State Administrative Tribunal during the audit period. A search of the eCourts Portal of WA for cases involving Busselton Water did not return any results. Consequently, this obligation is not rated.	N/P	N/R
30	<i>Water Services Act Section 125(2)</i> 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 Strata Titles Act 1985.	4	- Stantec notes that section 66 of the Strata Titles Act has been renumbered to 75. - Stantec reviewed a bill for a customer that lived in a unit that shared a water meter with 4 other units. It was confirmed that each unit occupier was charged for one fifth (20%) of the total consumption through the meter.	N/P	1
31	<i>Water Services Act Section 128(4)</i> If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of memorial with Registrar along with the prescribed fee (if any) if the charge or contribution has been paid.	4	Stantec confirmed with Manager Customer Service and reviewed the Action Sheet – Water Compliance Reporting Manual that no memorials were lodged with the Registrar during the audit period. Consequently, this obligation is not rated.	N/P	N/R
32	<i>Water Services Act Section 129(5)</i> If a routine inspection or maintenance is likely to cause disruption to the occupants of a place at least 48 hours' notice of a proposed entry must be given to the occupier of the place unless the occupier agrees otherwise.	4	Stantec confirmed with Manager Customer Service that appropriate procedures and notice/letter templates are in place to ensure that this obligation is met.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
33	<i>Water Services Act Section 139(3)</i> 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.	5	Stantec confirmed that several property fences were removed during the audit period to facilitate construction after obtaining landowner approval. Busselton Water consults with the landowners to ensure that the fences are appropriately reinstated.	N/P	1
34	<i>Water Services Act Section 141(1)</i> 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	- Stantec confirmed that the City of Busselton is the controlling body for all local roads with Busselton Water's operating area. Whilst Main Roads WA is the controlling body for all major roads within the operating area. - Stantec confirmed with Manager Assets and Planning that Busselton Water closely liaises with both parties and provides appropriate notification.	N/P	1
35	<i>Water Services Act Sections 142</i> The licensee must comply with sections 143 and 144 of the Act in relation to the proposed major works, and has given any notice required by section 148.	4	Stantec confirmed with Manager Assets and Planning that Busselton Water is aware of their obligations under these sections of the Act and that appropriate policy and procedures (Preliminary to Construction Manual) are in place. However, there were no major works during the audit period and this obligation is not rated.	N/P	N/R
36	<i>Water Services Act Sections 143(2)</i> Before the licensee submits a proposal for the provision of major works to the Minister, the licensee must prepare, publish and make available plans and details of those major works as specified.	4	As per obligation 35	N/P	N/R
37	<i>Water Services Act Sections 143(3)</i> The licensee must, within 5 days of publishing the plans and details on the licensee's website, give notice setting out the matters prescribed in section 143(4) to the persons and agencies specified.	4	As per obligation 35	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
38	<i>Water Services Act Sections 144(3)</i> The licensee must have regard to an objection or submission lodged within the relevant period.	4	As per obligation 35	N/P	N/R
39	<i>Water Services Act Section 145(2)</i> 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	N/P	N/R
40	<i>Water Services Act Section 147(3)</i> 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	N/P	N/R
41	<i>Water Services Act Section 147(4)</i> 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	N/P	N/R
42	<i>Water Services Act Section 151(1)</i> A licensee proposing to provide water service works that are general works must prepare plans and details of the proposed works and publish and make them available for inspection.	4	- Stantec confirmed with Manager Assets and Planning that plans and details for general works are published and made available for viewing as per Busselton Water's Preliminaries to Construction Manual. - The Caves Road Pipeline Upgrade project was reviewed as a representative general works project.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
43	Water Services Act Section 151(2) 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	- General (and major) works notification requirements are detailed in the Preliminaries to Construction Manual inclusive of sample notifications. - Stantec confirmed that public notification of general works is provided as evidenced by the Caves Road pipeline upgrade project information sheet published on the Busselton Water website, and the Notice of Proposal provided to customers impacted by the works. - Stantec considers that the notice provided addresses the matters required by clause 151(3).	N/P	1
44	<i>Water Services Act Section 152(3)</i> The licensee must have regard to an objection or submission lodged by the date specified in the notice given under section 151(2).	4	Stantec confirmed with Busselton Water that no objections were submitted during the audit period. Consequently, this obligation is not rated.	N/P	N/R
45	<i>Water Services Act Section 153(3)</i> 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	- Refer obligation 43. - Stantec considers that appropriate policy and procedures are in place to ensure compliance with this obligation.	N/P	1
45A (2024)	<i>Water Services Act Section 160(1)</i> A licensee, when providing water service works, may: - deviate from any plan or description of, or proposal for, those works and - make any modification to the plan, description or proposal that is require by the circumstance, if the deviation or modification is agreed to in writing by the owner and occupier of the affected land.	4	Stantec considers that Preliminaries to Construction Manual provides adequate guidance for external approvals to ensure compliance with this obligation.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
46	<i>Water Services Act Section 166(5)</i> 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	Stantec confirmed with Manager Assets and Planning that Busselton Water is aware of their obligations under these sections of the act and that appropriate policy and procedures are in place. However, there was no advice from the Minister during the audit period and this obligation is not rated.	N/P	N/R
47	<i>Water Services Act Section 166(6)</i> Any costs incurred in taking an interest in land are to be paid by the licensee.	4	As per obligation 46	N/P	N/R
48	<i>Water Services Act Section 170</i> 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 Planning and Development Act 2005, unless the Minister permits the licensee to do so.	4	As per obligation 46	N/P	N/R
49	<i>Water Services Act Section 173(4)</i> In relation to entry to a place for the purposes of doing works, in the circumstances specified the licensee is required to give 48 hours' notice of proposed entry to a place to the occupier or owner, as applicable, unless the occupier or owner agrees otherwise.	4	- Busselton Water staff may need to enter customer properties to carry out water meter maintenance. - Stantec reviewed the Customer Service work instruction (Faults following cyclic reads) and confirmed that at least 48 hours' notice of planned entry was provided in accordance with the Act. - Furthermore, this policy is articulated in Busselton Water's 'Our Customer Commitment'.	N/P	1
50	<i>Water Services Act Section 174(1)</i> Notice of a proposed entry by the licensee must be in writing and must set out the purpose of the entry, including (if applicable) any work proposed to be carried out.	4	Stantec confirmed with Team Leader Networks that written notice is provided by mail, email or letter drop. Proforma templates are provided by Customer Service team for this purpose.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
51	<i>Water Services Act Section 174(3)</i> 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 practicable, and when it will not compromise the reason for entry, give notice of entry to the occupier.	4	As per obligation 50	N/P	1
52	<i>Water Services Act Section 175(2)</i> 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	- Busselton Water's water quality team members may enter a dwelling in response to a water quality complaint to carry out testing. Staff carry appropriate Busselton Water identification (uniform and identity card) to show the occupier. - Staff are guided by the Employee Handbook regarding issue and use of identity cards. - Entry to premises is initiated by a customer water quality complaint. Complaint resolution includes a visit to the property to conduct water testing (usually at the front tap). Entry to the dwelling only occurs (if required to resolve the complaint) following an explanation of the purpose and consent from the occupier. - Stantec confirms that the prescribed actions are undertaken before entering a dwelling.	N/P	1
53	<i>Water Services Act Section 175(5)</i> 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	Stantec confirms that Busselton Water has appropriate procedures in place to address this obligation. However, there were no instances of entering an unoccupied dwelling during the audit period.	N/P	N/R
54	<i>Water Services Act Section 176(1)</i> 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	Stantec confirms that Busselton Water has appropriate procedures in place to address this obligation. However, there were no instances of the owner or occupier withdrawing their consent during the audit period.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
55	<i>Water Services Act Section 176(3)</i> 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	Stantec confirms that Busselton Water has appropriate procedures in place to address this obligation. However, there were no instances of this occurring during the audit period.	N/P	N/R
56	<i>Water Services Act Section 176(4)</i> 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	Stantec confirms that Busselton Water has appropriate procedures in place to address this obligation. However, there were no instances of staff being asked to leave during the audit period.	N/P	N/R
57	<i>Water Services Act Section 181</i> 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.	5	Stantec confirmed Busselton Water's has appropriate policies and procedures, including 'Our Customer Commitment' to ensure compliance with this obligation.	N/P	1
58	<i>Water Services Act Section 186</i> If the licensee applies for a warrant, the application must contain the prescribed information.	4	Stantec confirmed that there were no instances during the audit period that required a warrant. Consequently, this obligation is not rated.	N/P	N/R
59	<i>Water Services Act Section 187(1) – (3)</i> 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	N/P	N/R
60	<i>Water Services Act Section 190(4)</i> 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	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
61	<i>Water Services Act Section 190(5)</i> On completing the execution of a warrant the licensee must record the prescribed information on that warrant.	4	As per obligation 58	N/P	N/R
62	<i>Water Services Act Section 210(5)</i> 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	Stantec confirmed with Manager Customer Service that no person was designated as an inspector or compliance officer. Consequently, this obligation is not rated.	N/P	N/R
63	<i>Water Services Act Section 218(2)</i> 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.	5	Stantec can confirm that Busselton Water did not exercise a power of entry during the audit period. Consequently, this obligation is not rated.	N/P	N/R
64	<i>Water Services Act Section 218(3)</i> 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	- Busselton Water's "Our Customer Commitments" states that they will assist in the reinstatement or replacement of property or damage as a result of their actions. - Stantec can confirm that Busselton Water did not exercise a power of entry during the audit period. Consequently, this obligation is not rated.	N/P	N/R
Water Services Regulations 2013					
65	<i>Water Services Regulations 2013 Regulation 23(2)</i> 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 sub-meter is satisfactory for measuring the quantity or flow of water passing through a pipe supplying water to the unit.	4	Stantec confirmed with Busselton Water that no requests were made during the audit period.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
66	<i>Water Services Regulations 2013 Regulation 24(4)</i> If the licensee gives a compliance notice to a person in respect of access to meters, the notice must specify the specified information.	4	Stantec confirmed with Development Services Planner, and by viewing an example compliance notice, that the required information is provided.	N/P	1
67	<i>Water Services Regulations 2013 Regulations 26(3)</i> 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 approved by the CEO for the purpose of this regulation.	4	- Stantec confirms that Busselton Water has the appropriate procedures in place to meet this obligation. This is achieved with the Testing of Water Meters procedure (P18.PR018) and the corresponding Meter Test work instruction in the Operations and Planning Work Instruction Manual. - Busselton Water's customer commitment statement is to "<i>conduct a meter registration test within 10 business days of receiving your request and payment, or at a mutually agreed day or time</i>".	N/P	1
68	<i>Water Services Regulations 2013 Regulation 26(5)</i> If a meter test finds that the meter is outside the prescribed tolerance applicable, the licensee must take the specified actions, bear the costs of testing and refund or credit any charges paid under regulation 26(3).	4	Stantec confirms that Busselton Water has adequate policy and procedures in place to meet this obligation. There is a clear alignment between the Bill Review procedure (P10.PR012) and the Testing of Water Meters procedure (P18.PR018) to ensure that the required action will be undertaken according to regulation 26(3).	N/P	1
69	<i>Water Services Regulations 2013 Regulation 29(1)</i> 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	Stantec confirms that Busselton Water has an Application of Time to Pay Facility to Certain Headworks procedure (P11.PR08) that complies with this obligation.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
70	<i>Water Services Regulations 2013 Regulation 42(2)</i> The written order requiring the owner or occupier of land to install a backflow prevention device must set out the date by which the device must be installed and tested (which must be at least 7 days after the day on which the order is given to the owner or occupier).	4	- Stantec confirmed that Busselton Water has published Backflow Protection information for customers on their website. - Stantec reviewed a sample written order with Development Services Planner and confirmed that this obligation is met.	N/P	1
71	<i>Water Services Regulations 2013 Regulation 43(3)</i> 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	Stantec confirmed that compliance notices are issued in accordance with Busselton Water's Maintain Backflow Protection Device procedure (P18.PR015). The compliance notice includes the information required by clause 43(3) of the Regulation.	N/P	1
72	<i>Water Services Regulations 2013 Regulation 43(6)</i> 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 day the notice is given to the owner or occupier).	4	Stantec reviewed a sample compliance notice with Development Service Planner and confirmed that the notice includes the prescribed information.	N/P	1
74	<i>Water Services Regulations 2013 Regulation 60(2)</i> 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	Stantec confirmed with General Manager Operations and Planning that it wasn't necessary to alter the position of any infrastructure during the audit period. Consequently, this obligation is not rated.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
75	<i>Water Services Regulations 2013 Regulation 63</i> If the licensee opens or breaks up the surface of a road, the licensee must complete the relevant work and reinstate and make good the road, and must take all reasonable measures to prevent that part of the road from being hazardous.	4	- Stantec confirmed with field services and projects representatives that Busselton Water takes the necessary steps to make good any road repairs and prevent hazards. - Team Leader - Networks liaises with the City of Busselton Development Control Officer and engages contractor to repair the road to City of Busselton (CoB) or Main Roads specifications. If required, temporary repairs are undertaken and monitored until repaired.	N/P	1
76	<i>Water Services Regulations 2013 Regulation 65(1)</i> The licensee must maintain records for all land in respect of which water service charges apply.	4	Stantec confirmed with Manager Customer Service that land records are maintained in Busselton Water's billing system (AquaRate).	N/P	1
77	<i>Water Services Regulations 2013 Regulation 65(2)</i> The records for all land in respect of which water service charges apply must contain the specified information.	4	Stantec confirmed by inspecting AquaRate that records contained the prescribed information to allow service charges to be determined.	N/P	1
78	<i>Water Services Regulations 2013 Regulation 65(4)</i> Unless regulation 65(5) applies, the licensee must make the records for all land in respect of which water service charges apply available for inspection by any person without charge, and give a copy of particular records to a person with a material interest in them, on payment of the specified charge, if any, for giving a copy of the records.	4	Stantec confirmed with Customer Service Manager that Busselton Water has the necessary policy and procedures in place. A request of this nature was not made during the audit period and consequently, this obligation has not been rated.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
78A	<i>Water Services Regulations 2013 Regulations 65(5) and 65(6)</i> Unless a customer gives their consent under regulation 65(6), the licensee must not make a record relating to a customer available for inspection by a person, or give a copy of a particular record relating to the customer to a person, if doing so would disclose information that the customer has requested be kept confidential because the customer believes that disclosure could increase the risk of family violence to the customer or an associated person.	4	- Stantec confirmed with Manager Customer Service that Busselton Water has appropriate policies and procedures in place to meet this obligation. Specifically, the Privacy procedure (P10.PR02) sets out Busselton Water's privacy practices. - Sensitive information is further protected using AquaRate's 'Forced Note' functionality to limit access to senior customer service staff.	N/P	1
79	<i>Water Services Regulations 2013 Regulation 67</i> Except as otherwise provided under the Act, the records maintained by the licensee for a period in relation to land are the basis upon which the licensee must determine the water service charges applicable for the period.	4	Stantec confirmed with Manager Customer Service that records such as meter size and billing classification, are the basis for determining water service charges.	N/P	1
80	<i>Water Services Regulations 2013 Regulation 68(5)</i> The licensee must consider an objection to the records maintained by a licensee under regulation 65 as soon as practicable.	5	Stantec confirmed with Customer Service Manager that no objections were made during the audit period.	N/P	N/R
81	<i>Water Services Regulations 2013 Regulation 68(6)</i> The licensee must give the person by whom the objection was made written notice of the licensee's decision on the objection together with a brief statement of the licensee's reasons for the decision.	4	Refer obligation 80	N/P	N/R
82	<i>Water Services Regulations 2013 Regulation 68(7)</i> If the licensee allows an objection, wholly or in part, to entries in the records maintained by a licensee under regulation 65, the licensee must advise the person who objected of any consequent amendment of the records.	4	Refer obligation 80	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
83	<i>Water Services Regulations 2013 Regulation 68(8)</i> If the licensee disallows an objection, wholly or in part, to entries in the records maintained by a licensee under regulation 65, the licensee must advise the person of the time within which and the manner in which a review of the decision may be sought.	4	Refer obligation 80	N/P	N/R
84	<i>Water Services Regulations 2013 Regulation 69(3)</i> Upon receipt of a notice from a person dissatisfied with a decision of the licensee on an objection, the licensee must promptly refer the relevant records to the State Administrative Tribunal for a review.	4	Refer obligation 80	N/P	N/R
85	<i>Water Services Regulations 2013 Regulation 70(2)</i> Upon receipt of a notice from a person dissatisfied with a decision of the licensee to refuse to extend the time for giving an objection to the licensee or a notice under regulation 69(2), the licensee must promptly refer the decision to the State Administrative Tribunal for a review.	4	Refer obligation 80	N/P	N/R
86	<i>Water Services Regulations 2013 Regulation 74(1)</i> The licensee must make any amendment of the records necessary as a consequence of an allowance, wholly or in part, of an objection under the Act or the Valuation of Land Act 1978 or as a consequence of a review by the State Administrative Tribunal.	4	Refer obligation 80	N/P	N/R
87	<i>Water Services Regulations 2013 Regulation 74(2)</i> The licensee must, if necessary, as a consequence of the amendment to the records under regulation 74(1), determine or re-determine any water service charge; and, if necessary, provide a rebate or refund.	4	Refer obligation 80	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
88	<i>Water Services Regulations 2013 Regulation 75(1)</i> If a person is liable, under an agreement with the owner of land, for payment of the water service charges in respect of certain land, the person is entitled to receive from the licensee all information necessary for the person to assess his or her liability under the agreement.	4	- Stantec confirmed with Manager Customer Service that property owners (landlords) can authorise for water usage bills to be sent directly to their tenants for payment. - Busselton Water provides supporting information on the Landlords and Tenants page on their website.	N/P	1
88A	<i>Water Services Regulations 2013 Regulation 80H</i> The licensee must, within 60 days after receiving a water efficiency management plan from an owner or occupier of a non-residential lot, approve the plan, request further information, or request a revised plan by written notice.	4	Stantec confirmed with General Manager Operations and Planning that no water efficiency management plans were received during the audit period. Consequently, this obligation is not rated.	N/P	N/R
89	<i>Water Services Regulations 2013 Regulation 85</i> 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	Stantec confirmed with Busselton Water representatives that compliance notices are compiled using proformas and include the required information.	N/P	1
90	<i>Water Services Regulations 2013 Regulation 86(6)</i> If the licensee appoints an employee as an authorised or approved officer for the purposes of the Criminal Procedure Act 2004 Part 2, the licensee must issue the officer a certificate, badge or identity card identifying the officer as a person authorised to issue infringement notices.	4	Stantec confirmed with General Manager Operations and Planning that no employees were appointed as authorised or approved officers during the audit period. Consequently, this obligation is not rated.	N/P	N/R
91	<i>Water Services Regulations 2013 Regulation 86(9)</i> The licensee must maintain a list of persons appointed to be authorised officers or approved officers for the purposes of the Criminal Procedure Act 2004 Part 2, and must, on request, give a copy of the list to the CEO or to the chief executive officer of the Public Services principally assisting in the administration of the Criminal Procedure Act 2004.	4	Refer obligation 90	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
Water Services Code of Conduct (Customer Services Standards) 2018 and 2024					
92	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 8(1)-(3)</i> The licensee must have written information for customers about the prescribed matters regarding connections and the information must be publicly available. (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).	4	- Stantec confirmed that the following prescribed information regarding connections is available via Busselton Water's website: - Entitlements - Licensee functions - How to apply for a connection - What a customer must do - Review of bills - Fees - Time frames - Busselton Water's customer charter 'Our Customer Commitment' addresses these matters.	N/P	1
93	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 9(2) and (4)</i> 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	- Stantec confirmed with General Manager Operations and Planning that this performance indicator is included in the monthly Business Performance Report. Data for the report is extracted from service connection request work orders captured in Busselton Water's computerised maintenance management system (CMMS). - Busselton Water exceeded the target of 90% connections within 10 business days for 2022/2023, 2023/2024 and 2024/25 (YTD).	N/P	1
94	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 10(2)</i> 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	Stantec confirmed with the Customer Service Manager and by reviewing customer bills, that Busselton Water charges a fixed daily rate for the 'Water Service Charge'. This charge is billed to the customer every 4 months.	N/P	1
95	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(2)</i> If the licensee charges a quantity charge, the licensee must issue a bill for a quantity charge at least once in every 4-month period to each customer.	4	Stantec confirmed with the Customer Service Manager and by reviewing customer bills, that Busselton Water charges a metered rate for the 'Water Consumption'. This charge is billed to the customer every 4 months.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
96	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(3)</i> A bill for usage must be based on a meter reading to ascertain the quantity supplied or discharged.	4	Stantec confirmed with the Customer Service Manager, and field technicians, that the water consumption charge is based on readings taken from the customer's meter.	N/P	1
97	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(4)</i> If an accurate meter reading is not possible, a bill for usage must be based on an estimate, in accordance with the specified regulations (if any), of the quantity of water supplied or wastewater discharged. (Note: The Water Services Regulations 2013 did not address the estimation of bills at the time this Reporting Manual was published).	4	Stantec confirmed that Busselton Water follows a publicly available procedure (P10.PR04 Bill Estimates) for estimating water consumption when a meter reading is not possible. The estimate is based on the average daily consumption from a similar period.	N/P	1
98	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(5)</i> 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 specified methods.	4	Refer obligation 97.	N/P	1
98A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 11(6)</i> 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	- Stantec confirmed that Busselton Water has smart meters (fitted with RF Cybles) installed throughout their water supply area. If a meter reading is not possible due to a faulty Cyble, a meter repair work order is generated prior to the next meter read. - Busselton Water have appropriate controls in place to ensure this obligation is met.	N/P	1
99 (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018</i> 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	Stantec confirmed with Manager Customer Service that Busselton Water uses AquaRate to manage customer details and billing. This billing system provides the required functionality for the customer to nominate another address to receive bills.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
99 (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(3)</i> A bill must be sent to the address of the place where the water service is provided or, to another address nominated by the customer.	4	Stantec confirmed with Manager Customer Service by demonstration of AquaRate, that this obligation is met.	N/P	1
99A (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(1)</i> A licensee must allow a customer to choose to receive bills by post or email.	4	Stantec confirmed with Manager Customer Service by demonstration of AquaRate, that this obligation is met.	N/P	1
99B (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(2)</i> A licensee must inform the customer of any charge for sending a bill when offering the choice under subclause 12(1).	4	- Stantec confirmed with Manager Customer Services, and by reviewing bill samples, that Busselton Water does not charge customers for issuing a bill by mail or email. - Stantec reviewed the Tariffs, Fees and Charges for 2024-25 information sheet which is published on Busselton Water's website. There is a fee for obtaining a copy of an assessment notice/ account summary.	N/P	1
99C (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(4)</i> A bill sent by email must be sent to an email address provided by the customer.	4	Stantec confirmed with Manager Customer Service by demonstration of AquaRate, that this obligation is met.	N/P	1
99D (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 12(5)</i> A licensee must not charge for sending a bill when any one of the specified situations apply to the customer.	4	Refer obligation 99B	N/P	1
100	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(1) and 2024 Clause 13(2)</i> Each bill must contain the prescribed information.	4	Stantec reviewed sample bills and confirmed that the prescribed information is contained on the bill.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
100A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(3) and 2024 Clause 13(7)</i> A bill issued for 2 or more water services must specify the charge payable for each water service.	4	Stantec reviewed sample bills provided by Manager Customer Service to confirm that the water supply tax invoice includes tariff information for individual services.	N/P	1
101	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(4) and 2024 Clause 13(3)</i> Each bill for usage for a metered water service must contain the specified information.	4	Stantec reviewed sample bills provided by Manager Customer Service to confirm that this obligation is met.	N/P	1
101A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(5) and 2024 Clause 13(4)</i> If a bill for usage for a metered water service was based on an estimate, the bill must inform the customer that the licensee will tell the customer the prescribed information on request.	4	- Stantec confirms that Busselton Water has a Bill Estimates procedure (P10.PR14) and a corresponding webpage to inform customers of the bill estimation process. - Stantec confirmed that Busselton Water complies with the obligation by reviewing a sample bill which states that the basis of the estimate will be provided on request.	N/P	1
102A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(6) and 2024 Clause 13(5)</i> Each bill must contain the prescribed information.	4	Stantec reviewed sample bills provided by Manager Customer Service to confirm that this obligation is met.	N/P	1
103	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 14(1)</i> 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	Stantec confirmed with Manager Customer Service that Busselton Water will explain the basis of the estimate on request. The 'Estimate your bill' page on Busselton Water's website provides an example of how water consumption may be estimated.	N/P	1
104	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 14(2)</i> 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	Stantec confirmed with Manager Customer Service that Busselton Water is compliant with this obligation, and that appropriate procedures are in place.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
104A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 15(3)</i> Each bill for usage to which clause 15 applies must, in addition to the requirements of clause 13, contain the specified information.	4	Stantec reviewed sample bills provided by Manager Customer Service to confirm that this obligation is met.	N/P	1
105	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 16(1)</i> The licensee must provide to the customer on request either or both of the following: - a meter reading and a bill to determine the outstanding charges for a period that is not the same as the usual bill cycle, - if the customer disputes an estimate on which a bill is based, a meter reading and revised bill.	4	Stantec confirmed with Manager Customer Service that an interim meter reading and statement can be provided.	N/P	1
106	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 17(2) and (3)</i> 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 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.	4	- Stantec confirmed that Busselton Water has a Leak Allowance procedure (P10.PR021) plus a publicly available Leak Allowance page on their website. Customers must complete a Leak Allowance Application form to be eligible for a discount (leak allowance). - Stantec considers that Busselton Water is compliant with this obligation.	N/P	1
107	<i>Water Services Code of Conduct (Customer Service Standards) 2018 and 2024 Clause 18(2)</i> 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	- Stantec confirms that Busselton Water has the appropriate Bill Review procedure (P10.PR012) in place to meet this obligation. The procedure states that Busselton Water can only recover an undercharged amount as per clause 18(2). - Stantec confirmed with Manager Customer Service that no examples of undercharging occurred during the audit period.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
108	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(3)</i> An undercharged amount must be the subject of, and explained in, a special bill or a separate item in the next bill.	3	Stantec reviewed the Bill Review procedure and confirmed with Manager Customer Service that a special bill is issued to recover the undercharged amount.	A	1
109 (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(4)</i> The licensee must not charge interest or late payment fees on an undercharged amount.	3	Stantec reviewed the Bill Review procedure and confirmed with Manager Customer Service that Busselton Water will not charge interest or late payment fees for the recovery of an undercharged amount.	A	1
109 (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 18(4)</i> Subject to subclauses 18(6), (7), (8) or (9), the licensee must not charge interest or late payment fees on an undercharged amount	3	- Stantec reviewed the Bill Review procedure and confirmed with Manager Customer Service that Busselton Water will not charge interest or late payment fees for the recovery of an undercharged amount. - Furthermore, Stantec confirmed that Busselton Water's Bill Review procedure is compliant with subclauses 18(6), (7), (8) and (9).	A	1
110	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(5)</i> 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.	3	Stantec confirmed that Busselton Water's Bill Review procedure allows customers to pay an undercharged amount in accordance with subclause 18(5) of the Code of Conduct.	A	1
111A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(2)</i> 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 overcharged amount may be refunded or credited to the customer's account.	4	Stantec confirmed that Busselton Water's Bill Review procedure (P10.PR012) complies with this obligation. This is reinforced by the terms outlined on the 'Review your bill' webpage. Busselton Water's policy is to automatically credit the overcharge to the customer account within 15 days.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
112A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(3)</i> 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	- Stantec has confirmed with Manager Customer Service that Busselton water is compliant with this obligation. However, we observed that the wording of the Bill Review procedure (P10.PR012) is not consistent with subclause 19(3) of the Code. - Stantec has provided recommendations to Busselton Water to improve the procedure.	B	1
112B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(4)</i> 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	- Stantec has confirmed with Manager Customer Service that Busselton Water is compliant with this obligation. However, we observed that the wording of the Bill Review procedure (P10.PR012) is not consistent with subclause 19(4) of the Code. - Stantec has provided recommendations to Busselton Water to improve the procedure.	B	1
112C (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(5)</i> 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	Stantec confirmed that Busselton Water's Bill Review procedure (P10.PR012) complies with this obligation. This is reinforced by the terms outlined on the 'Review your bill' webpage.	N/P	1
112C (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 19(5)</i> The licensee must notify the customer immediately after crediting the overcharged amount to the customer's account under clause 19.	4	Stantec confirmed that Busselton Water's Bill Review procedure (P10.PR012) complies with this obligation. This is reinforced by the terms outlined on the 'Review your bill' webpage.	N/P	1
113	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(1) and 2024 Clause 21(1)</i> The licensee must review a bill on the customer's request.	4	Stantec confirmed that Busselton Water has the appropriate policy and procedure (P10.PR012 Bill Review) in place to comply with this obligation.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
113A (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 21(2)</i> 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 20 business days from the day the customer's request for review was received.	4	Stantec confirmed with Manager Customer Service that the Bill Review procedure includes a step to notify the customer of the outcome of the review within 15 business days. The customer's Water Bill Review Form is logged into AquaTact (CRM system) with a due date for response to ensure that this target is achieved.	N/P	1
113B (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 21(3)</i> If the licensee does not complete a review before the end of the 20 business days, the licensee must notify the customer of the status of the review as soon as practicable after the end of that period.	4	Stantec confirmed with Manager Customer Service that all bill reviews were completed on time. Consequently, this obligation is not rated.	N/P	N/R
114	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(2) and 2024 Clause 22(1)</i> The license must have a written procedure for the review of a bill on the customer's request.	4	- Stantec confirmed that Busselton Water has the appropriate policy and procedure (P10.PR012 Bill Review) in place to comply with this obligation. - The bill review process is explained on Busselton Water's website on the 'Review your bill' page.	N/P	1
115	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 20(3) & (6) and 2024 Clauses 22(2) & (4)</i> 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	- Stantec reviewed the bill review procedure and can confirm that the information specified in clause 20(2) is included. - Stantec also confirmed that the bill review procedure is available on Busselton Water's website. A hardcopy is available upon request.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
116 (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(4)</i> 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	Stantec confirmed that Busselton Water's bill review procedure includes the required statement regarding the options available to make a complaint or seek assistance of the ombudsman (for review or appeal).	N/P	1
116 (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 22(3)</i> The review procedure must state that the customer may, but is not required 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	Stantec confirmed that Busselton Water's bill review procedure includes the required statement regarding the options available to make a complaint or seek assistance of the ombudsman (for review or appeal).	N/P	1
117 (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(5)</i> 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	- Note that this obligation is replaced by 113A and 113B from 1 July 2024. - Stantec confirmed with Manager Customer Service that the Bill Review procedure includes a step to notify the customer of the outcome of the review within 15 business days. The customer's Water Bill Review Form is logged into AquaTact (CRM system) with a due date for response to ensure that this target is achieved.	N/P	1



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117A (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 21</i> 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).	2	- Stantec confirmed with Manager Customer Services that customers are notified of rate changes prior to the next bill that includes the rate rise. - Stantec reviewed the June 2024 Watersource newsletter which included information about the upcoming rate rise for the 2024/2025 financial year. A hardcopy of the newsletter is sent to all customers in June of each year prior to the issue of the July bill.	A	1
117A (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 20(1)</i> 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 subclause 20(2)	2	- Stantec confirmed with Manager Customer Services that customers are notified of rate changes prior to the next bill that includes the rate rise. - Stantec reviewed the June 2024 Watersource newsletter which included information about the upcoming rate rise for the 2024/2025 financial year. A hardcopy of the newsletter is sent to all customers in June of each year prior to the issue of the July bill.	A	1
118	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 23 and 2024 Clause 24</i> The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued.	4	Stantec confirmed by reviewing a sample of bills that the due date of the bill is 28 days after date of issue.	N/P	1
119	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 24(1) and 2024 Clause 25(1)</i> The licensee must allow a customer to pay a bill using any of the prescribed methods selected by the customer.	4	Stantec confirmed by reviewing sample bills that Busselton Water allows customers to pay by centrepay, internet, telephone or post.	N/P	1



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120	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 24(2) and 2024 Clause 25(2)</i> 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	Stantec confirms that Busselton Water informs customers of the fees and charges associated with bill payment options. The only payment method that attracts a fee is payment by credit card. We confirm that customers are informed of the transaction fee on the bill and on Busselton Water's website.	N/P	1
121 (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 25(1)</i> 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	Stantec confirmed with Manager Customer Service that consent is obtained from the customer via telephone or electronic Direct Debit Request form.	N/P	1
121 (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 26</i> Before receiving a bill payment by direct debit the licensee must obtain written or oral express consent of the customer or of an adult person nominated by the customer to give consent.	4	Stantec confirmed with Manager Customer Service that consent is obtained from the customer via telephone or electronic Direct Debit Request form.	N/P	1
122	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 26(1) and 2024 Clause 27(1)</i> The licensee must accept payment in advance from a customer on a customer's request.	4	Stantec confirmed with Manager Customer Service that Busselton Water accepts payment in advance from customers. A sample account was viewed to confirm compliance with this obligation.	N/P	1
123	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 27 and 2024 Clause 28</i> The licensee must on request and at no charge redirect a customer's bills because of the customer's absence or illness.	4	Stantec confirmed with Manager Customer Service, and by viewing and example customer record in AquaRate, that this obligation is met by Busselton Water.	N/P	1



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123A (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 29(1)-(2)</i> For each bill issued, the licensee must allow customers (all residential customers and the business customers who have notified the licensee that they are experiencing payment difficulties) to select one of the following options: - Additional time to pay a bill or - Choosing a payment plan for an amount owing by the customer to the licensee.	2	- Stantec confirmed that Busselton Water complies with this obligation. The payment section of the bill invites customers experiencing payment difficulties to call Busselton Water. - Busselton Water's Payment Arrangements – Water Supply Invoices (P10-PR09) procedure provides options for a payment extension (28 days) or a payment plan. This procedure is available to all customers and an assessment for payment difficulties is not required. - We also confirmed with Customer Service Manager that Busselton Water's billing system (AquaRate) include the necessary functionality to meet this obligation.	A	1
124A (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(2)</i> 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	Stantec confirmed with Manager Customer Service that customers experiencing payment difficulties are adequately supported under Busselton Water's Payment Arrangements – Water Supply Invoices (P10.PR09) procedure. Customers can be offered more time to pay (28 days) or enter into a payment arrangement.	N/P	1
124B (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(3)</i> 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	Stantec confirmed with Manager Customer Service that an in-depth conversation with the customer takes place to determine the customer's capacity to pay, with consideration of water usage patterns.	N/P	1



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124B (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(1)</i> When formulating a payment plan to assist a customer the licensee must take the customer's capacity to pay any bill. 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	- Stantec confirmed with Manager Customer Service that an in-depth conversation with the customer takes place to determine the customer's capacity to pay, with consideration of water usage patterns. - The Payment Arrangement calculator within AquaRate is used to guide the conversation with the customer. - Busselton Water will formulate payment plans that are spread over the 4-month billing period, or longer as required.	N/P	1
124C (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(4)</i> 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	Stantec can confirm from reviewing the Payment Arrangements – Water Supply Invoices (P10.PR09) procedure, that interest or overdue fees will not be charged while the customer is adhering to their agreed payment arrangement.	N/P	1
124D (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(4)</i> If a customer accepts a payment plan, the licensee must provide the customer the specified information in writing within 5 business days of the customer accepting the payment plan, unless the customer has provided the specified information in the preceding 12 months.	2	Stantec can confirm from reviewing the Payment Arrangements – Water Supply Invoices (P10.PR09) procedure, that a Confirmation of Payment Arrangement Letter is provided to customers within 5 business days.	A	1
124E (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(6)</i> A licensee must, in relation to a residential customer for whom a payment plan is being considered, offer the customer assistance to manage their bills for ongoing provision of services during the period of the payment plan.	2	Stantec confirmed with Manager Customer Service that support is provided in the form of using a payment planning calculator and setting up payment reminders via SMS. Stantec consider that this support is compliant with the intent of the obligation.	A	1



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124F (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 30(7)</i> A licensee must, in relation to a business customer, consider and decide whether or not a payment plan should be interest-free, fee-free or both.	4	Stantec confirmed with Manager Customer Service that business customers are treated the same as residential customers with regard to payment arrangements. Consequently, business customers are offered interest and fee free payment plans.	N/P	1
124G (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 31(1)</i> A licensee must review a payment plan at the request of a customer.	2	Stantec confirmed with Manager Customer Service that Busselton Water will review a payment plan at the customer's request. This is outlined in the Payment Arrangements – Water Supply Invoices procedure (P10.PR09).	A	1
124H (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 31(2)</i> The licensee must offer to vary a payment plan if a review of the payment plan, under subclause 31(1), indicates that the customer is unable to meet the payment plan obligations.	2	Stantec confirmed with Manager Customer Service that Busselton Water will offer to vary payment if the customer is unable to meet the plan obligations. This is outlined in the Payment Arrangements – Water Supply Invoices procedure (P10.PR09).	A	1
124I (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 31(3)</i> The licensee must, within 5 business days after the customer accepts an offer to vary the payment plan, provide the customer with information that clearly explains, and assists the customer to understand the variation.	2	Stantec confirmed with Manager Customer Service that Busselton Water provides the customer with a revised Confirmation of Payment Arrangement Letter that outlines the changes to the plan.	A	1
124J (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 32(1) and (2)</i> A licensee must not vary a payment plan without the customer's agreement, where the agreement relates to the particular variation rather than under a general agreement to future variations.	2	Stantec confirmed that Busselton Water has appropriate procedures in place to meet this obligation. However, no payment plans variations were undertaken during the audit period.	A	1
125	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 29(1) & (2) and 2024 Clauses 32(1) and (2)</i> The licensee must have a written policy in relation to financial hardship that is approved by the ERA.	4	Stantec can confirm that Busselton Water has a Financial Hardship Policy that was approved by ERA on 26/10/2024.	N/P	1



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126A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(3) and 2024 Clause 32(3)</i> 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	N/P	1
126B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(4) and 2024 Clause 32(4)</i> 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	N/P	1
128	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(6) and 2024 Clause 32(6)</i> 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	Stantec can confirm that the Financial Hardship policy is available on Busselton Water's website and a hardcopy can be provided at no charge.	N/P	1
129A (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(7)</i> The licensee must review its financial hardship policy at least once in every 5-year period.	4	Stantec can confirm that the review period of the policy is at least five years. It is next due for review by September 2029.	N/P	1
129B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(8) and 2024 Clause 32(7)</i> The licensee must review its financial hardship policy if directed to do so by the ERA.	4	Stantec confirmed with Manager Customer Service that the most recent review of the policy was made at the direction of ERA. We therefore consider that Busselton Water has complied with this obligation.	N/P	1
129C (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(9)</i> The licensee must consult with relevant consumer organisations when formulating or reviewing its financial hardship policy.	4	Stantec confirmed with Manager Customer Service, and reviewed correspondence, that Busselton Water consulted with the Financial Counsellors' Association for the 2023 review of the Policy.	N/P	1



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129C (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 32(8)</i> A licensee must consult with relevant consumer organisations whenever the licensee is developing a financial hardship policy or making a material amendment to its financial hardship policy.	4	Stantec confirmed with Manager Customer Service that Busselton Water did not make any material changes to the Policy during the audit period.	N/P	N/R
130A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(2) and 2024 Clause 33(2)</i> 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	- Stantec can confirm that Busselton Water's Financial Hardship procedure (P10.PR08) will be followed for customers experiencing financial hardship. Customers are advised of the options available that are consistent and compliant with this obligation. - Furthermore, information for customers experiencing financial hardship can be found on Busselton Water's website on the Financial Difficulty page.	N/P	1
130B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(3) and 2024 Clause 33(3)</i> When formulating a payment plan or other arrangement for a customer that the licensee has assessed as 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.	4	- Stantec confirmed with Manager Customer Service that an in-depth conversation with the customer takes place to determine the customer's capacity to pay, with consideration of water usage patterns. - The Payment Arrangement calculator within AquaRate is used to guide the conversation with the customer.	N/P	1
131A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(a) and 2024 Clause 33(4)(a)</i> The licensee must consider reducing the amount owing by the customer.	4	Stantec confirmed that the Financial Hardship policy states that Busselton Water will consider reducing the amount owed for customers affected by financial hardship.	N/P	1



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131B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(b) and 2024 Clause 33(4)(b)</i> 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	Stantec confirmed that this obligation is met by Busselton Water's Financial Hardship procedure (P10.PR08).	N/P	1
131C	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4) and 2024 Clause 33(4)</i> The licensee must provide the specified written information to a customer.	4	Stantec confirmed that this obligation is met by Busselton Water's Financial Hardship procedure (P10.PR08).	N/P	1
133	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 31(4) & (5) and 2024 Clauses 34(4) and (5)</i> 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	Stantec confirmed that information regarding payment schemes can be found on Busselton Water's website on the Financial Difficulty sub-page under the 'Paying Your Water Bill' page.	N/P	1
133A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 32 and 2024 Clause 35</i> The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances.	4	- Stantec confirmed that overdue fees or interest charges will not be levied on the extended time or payment arrangement, for customers experiencing financial hardship. This is outlined in Busselton Water's Financial Hardship procedure (P10.PR08) and Payment Arrangements – Water Supply Invoices procedure (P10.PR09). - The Complaint Management procedure (P10.PR014) instructs customer service staff to apply a 'waive interest' flag in the billing system if there is an unresolved billing complaint.	N/P	1



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134 (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 33(1)(a)-(c)</i> The licensee must not commence or continue proceedings to recover a debt 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.	4	Stantec confirmed that Busselton Water did not commence or continue proceedings to recover debt from customers experiencing payment difficulties or financial hardship as per this obligation. This is outlined in Busselton Water's Financial Hardship procedure (P10.PR08) and the Water Sales Debt Recovery procedure (P10.PR05).	N/P	1
134 (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 36(1)(a)-(c)</i> The licensee must not commence or continue proceedings to recover a debt from a customer if the customer is complying with a payment plan or other arrangement or is being assessed for financial hardship.	4	Stantec confirmed that Busselton Water did not commence or continue proceedings to recover debt from customers on payment plans or experiencing financial hardship as per this obligation. This is outlined in Busselton Water's Water Sales Debt Recovery procedure (P10.PR05) and Financial Hardship procedure (P10.PR08).	N/P	1
134A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 33(1)(d)-(c) and 2024 Clause 36(1)(d)-(c)</i> 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	Stantec confirmed with Manager Customer service that a Forced Note is applied to the customer's account in AquaRate when notified by the Ombudsman of a customer complaint.	N/P	1
135	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 40(1) and 2024 Clause 43(1)</i> 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	Stantec confirms that Busselton Water's Installation and Removal of Restriction Devices procedure (P10.PR013) sets out the conditions for removal of a restriction device which complies with this obligation.	N/P	1



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136	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 40(2) and 2024 Clause 43(2)</i> 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 135	N/P	1
137A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(1) and 2024 Clause 39(1)</i> The licensee must not start a water supply restriction unless the licensee has given the customer a reminder notice (that includes the information specified in clause 38), the water service charge has still not been paid in full, and the licensee has given the customer a restriction notice.	4	Stantec confirmed that Busselton Water's Water Sales Debt Recovery procedure (P10.PR05) issues the customer with a final notice 7 days after the bill due date, requiring payment within 14 days. If the bill remains unpaid, written notice is provided to the customer that flow restriction will be implemented. This procedure is compliant with the obligation.	N/P	1
137B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 39(2) and 2024 Clause 36(2)</i> 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	Stantec confirmed that restriction notices were issued during the audit period. We reviewed a water restriction notice and can confirm that at least 7 days' notice was provided to the customer. The process is outlined in the Installation and Removal of Restriction Devices procedure (P10.PR013).	N/P	1
137C	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(3) and 2024 Clause 39(3)</i> The restriction notice must include the specified information.	4	Stantec can confirm that the sample restriction notice viewed for obligation 137B contained the required information.	N/P	1



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138	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 37(1)(a) and (e) and 2024 Clause 40(1)(a) and (c)-(h)</i> The licensee must not start a water supply restriction if any of the specified circumstances apply.	4	- Stantec confirms that restrictions were imposed during the audit period. - Busselton Water's Installation and Removal of Restriction Devices procedure (P10.PR013) outlines the conditions that would prevent a restriction device being applied which complies with this obligation. - The process is automated via AquaRate according to the conditions outlined in the procedure (P10.PR013). All restrictions generated by AquaRate are reviewed by customer support staff before proceeding. - With these measures in place, Stantec confirm that Busselton Water have complied with this obligation.	N/P	1
138B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 38 and 2024 Clause 41</i> The licensee must not start a water supply restriction on or during the specified times.	4	- Stantec confirms that Busselton Water's Installation and Removal of Restriction Devices procedure (P10.PR013) outlines the times/days when restriction may not commence which complies with this obligation. - Works are only schedule from Busselton Water's asset management system (Confirm) on days specified in the procedure (P10.PR013). Furthermore, installation of restriction devices requires attendance of a customer service officer to ensure the procedure is followed.	N/P	1
139	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 39 and 2024 Clause 42</i> 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	Stantec confirmed with Manager Customer Service that a standard restriction device is used which is calibrated to a minimum flow rate of 2.3 litres per minute.	N/P	1



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142	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(4) and 2024 Clause 44(5)</i> 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	- Stantec confirms that according to the Installation and Removal of Restriction Devices procedure (P10.PR013), Busselton Water restored water supply in accordance with this obligation. - Busselton Water provided a list of supply restoration (restrictor removals) that demonstrates supply was restored within the specified timeframe.	N/P	1
144	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(6) and 2024 Clause 44(6)</i> The licensee (other than the Water Corporation) must ensure that there is at least a 90% compliance rate with subclause 44(5) in any 12-month period ending on 30 June.	4	Stantec confirmed with General Manager Operations and Planning that this compliance rate is monitored via the monthly performance report. The current compliance rate is 100%.	N/P	1
144A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 43(1) and 2024 Clause 46(1)</i> The licensee must give notice of any planned service interruption to each customer that will be affected by the service interruption.	4	Stantec confirmed with General Manager Operations and Planning that all planned interruptions are managed within Busselton Water's CMMS. Network services staff follow standard work instructions within the Work Instruction Manual which includes required customer notification requirements. Accordingly, this obligation is met.	N/P	1
144B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 43(2) and 2024 Clause 46(2)</i> The notice of any planned service interruption must be given within the prescribed timeframes.	4	As per obligation 144B	N/P	1
144C	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 44(1) and 2024 Clause 47(1)</i> 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	Stantec confirmed that Busselton Water's Asset Management procedures and Work Instruction Manual provides the necessary procedures to respond to and minimise the impact of water supply defects.	N/P	1



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144D	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 44(2) and 2024 Clause 47(2)</i> The policies, practices and procedures under clause 44(1) must deal with the prescribed matters.	4	As per obligation 144C	N/P	1
144E	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 45 and 2024 Clause 48</i> 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 expected duration of, any unplanned service interruption.	4	Stantec confirmed by calling Busselton Water's 24-hour information line that this obligation is met.	N/P	1
145	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(1) and 2024 Clause 49(1)</i> 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	- Stantec confirmed with Manager Customer Service that Busselton water has an internal written complaints management procedure (P10.PR014). - Customer complaints are recorded in Busselton Water's customer relationship management tool (AquaTact). Each month all registered complaints are manually exported from AquaTact and copied into the Complaints Register (MS Excel) which is kept in the records database (Monarch).	N/P	1
146	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(2) and 2024 Clause 49(2)</i> The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS 10002:2022 and the ERA's guidelines (if any).	<u>2</u>	Stantec confirmed that Busselton Water's complaints management procedure is aligned with the guiding principles of AS 10002:2022 including enabling complaints, managing complaints, and managing the parties.	A	1



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147 (2021)	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(3)</i> The licensee's complaints procedure must provide for the matters specified in relation to lodgement of complaints, responding to complaints, dispute resolution arrangements and resolving complaints.	2	Stantec confirmed by reviewing Busselton Water's complaints procedure and register, that specified matters are addressed.	A	1
147 (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 49(3)</i> The licensee's complaints procedure must provide for the matters specified in relation to lodgement of complaints, acknowledging complaints, responding to complaints, and dispute resolution arrangements.	2	- Refer obligation 147 (2021) - Furthermore, Stantec reviewed the complaints register and confirmed that Busselton Water acknowledged complaints within 10 days. - Stantec considers that Busselton Water's complaints procedure does not adequately address acknowledgement of complaints submitted online or by mail.	B	1
148A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(4) and 2024 Clause 49(4)</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).	4	Stantec confirmed that Busselton Water's complaints procedure includes the required steps available to the customer to apply to the Ombudsman for a review or to make an appeal.	N/P	1
149	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(5) and 2024 Clause 49(5)</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.	4	- Stantec confirmed that Busselton Water has a customer facing Customer Complaints Resolution procedure on the Complaints page of their website. This procedure is aligned with Complaints Management procedure (P10.PR014) and complies with obligations 146 to 148A. - This procedure is available upon request as a hard copy at no charge to the customer.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
149A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 47 and 2024 Clause 50</i> 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.	2	- Busselton Water reported in their 2021/22 compliance report that 3 out of 19 complaints were not sent close-out letters. - Stantec confirmed that Busselton Water has implemented appropriate measures to prevent this from reoccurring. Therefore, a recommendation has not been made.	B	2
150	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 48(1) and 2024 Clause 51(1)</i> The licensee must provide a customer with the specified services on request and at no charge.	4	- Stantec can confirm that Busselton Water provides national relay service for the hearing or speech impaired, and translating and interpreting service contact details on their website. Details of these services are also included on the customer's bill. - Stantec confirmed with Manager Customer Service that large print copies of documents are available on request.	N/P	1
152	<i>Water Services Code of Conduct (Customer Service Standards) 2013 Clause 48(2) and 2024 Clause 51(2) and (3)</i> 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	- Stantec confirmed with Manager Customer Service that account information (dating back to 2003) will be provided over the phone to customers on request. - Furthermore, Stantec viewed customer billing data across several billing periods to validate this obligation. The General Manager of Operations and Planning confirmed that no one had been charged during audit. - However, in their Tariffs, Fees and Charges for 2024-25 a customer can be charged \$7.30 for a copy of assessment notice/account summary. If this fee were to be charged, this obligation would not be met.	B	1
153	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(1) and 2024 Clause 52(1)</i> The licensee must make the prescribed information publicly available.	4	Stantec confirmed that the prescribed information is available on Busselton Water's website via Our Customer Commitment and various factsheets.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
154	<i>Water Services Code of Conduct (Customer Service Standards) 2013 Clause 49(2) and 2024 Clause 52(2)</i> The licensee must ensure that the specified information about bills may be obtained from its website.	4	Stantec confirmed that the prescribed information is available on Busselton Water's website via Our Customer Commitment and various factsheets.	N/P	1
154AA (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 52(3)</i> A licensee must ensure that the specified information about Part 9 may be obtained from its website.	4	- Stantec could not locate the specified information about the preserved supply register on Busselton Water's website. Recommendation A1/2025: - 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)	B	2
154A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(3) and 2024 Clause 52(4)</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 public access to electronic versions of Western Australian legislation.	4	Stantec can confirm that Busselton Water's website contains a link to the current version of the Code.	N/P	1
154B	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 51(1) & (3) and 2024 Clause 54(2)</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 54(1). The register must record the prescribed information in clauses 54(2)(b) and 54(4).	4	Stantec viewed a copy of the preserved supply register (R29 – Emergency Notification Register) and can confirm that the prescribed information is recorded.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
154CC (2024)	<i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 54(3)</i> The licensee must, within 5 business days after recording a person on the register, provide the specified information in writing to the person.	4	Stantec confirmed with General Manager Operations and Planning that no persons have been added onto the preserved supply register since this obligation came into effect. Consequently, this obligation has not been rated.	N/P	N/R
154C	<i>Water Services Code of Conduct (Customer Service Standards) 20218 Clause 52 and 2024 Clause 55</i> 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.	2	- Stantec can confirm that Busselton Water's Installation and Removal of Restriction Devices procedure (P10.PR013) states that water supply will not be restricted for a customer listed on the preserved supply register (R29 – Emergency Notification Register). - Stantec confirmed with Manager Customer Service that a customer service officer attends all supply restriction installations with the operations crew to ensure this obligation is met.	A	1
154D	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 53 and 2024 Clause 56</i> Despite clause 46(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 46(1) must be given in the specified manner.	4	- Stantec confirmed that the R29 – Emergency Notification Register is used to ensure that customers on the preserved supply register are appropriately notified. - Stantec viewed a template of a water supply notification letter as evidence that Busselton Water provides notification in the prescribed manner.	N/P	1
Licence obligations					
155	<i>Licence Condition Clause 4.2.1</i> The licensee must pay the applicable fees and charges in accordance with the Economic Regulation Authority (Licensing Funding) Regulations 2014.	4	Stantec confirms that Busselton Water have paid the applicable fees and charges.	N/P	1
159	<i>Licence Condition Clause 4.1.2</i> The licensee must comply with a direction from the ERA in relation to a breach of applicable legislation.	4	Stantec are not aware of any directions from ERA in relation to a breach of legislation. Consequently, this obligation has not been rated.	N/P	N/R



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
160	<i>Licence Condition Clause 4.6.1</i> 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	Stantec confirms that Busselton Water has maintained appropriate financial records as reported and audited in their annual reports.	N/P	1
161	<i>Licence Condition Clause 5.2.1</i> The licensee must comply with any individual performance standards specified by the ERA.	4	The Licensee does not have individual performance standards specified by the ERA. This obligation has not been rated.	N/P	N/R
162	<i>Licence Condition Clause 5.3.4</i> The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the operational audit.	4	Stantec confirms that Busselton Water representatives were very cooperative during the audit and complied with the applicable guidelines.	N/P	1
163	<i>Licence Condition Clauses 4.7.1(a), (b), (c)</i> 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	Stantec confirms that Busselton Water is not under external administration, nor has there been any change in the circumstances upon which the licence was granted. Consequently, this obligation is not rated.	N/P	N/R
165	<i>Licence Condition Clause 4.8.1</i> 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.	2	- The 2022 Water Sewerage and Irrigation Licence Performance Reporting Datasheets were submitted to ERA late. Due 10 October 2022, submitted 18 October 2022. - Stantec confirmed that Busselton Water have appropriate measures in place to prevent this from reoccurring. Therefore, a recommendation is not required.	B	2
167	<i>Licence Condition Clause 4.8.2</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.	4	Stantec confirmed that Busselton Water has provided the required performance datasheet to ERA as per the Water, Sewerage and Irrigation Licence Performance Reporting Handbook, and the National Performance Framework. A copy of the email and associated datasheet was viewed for confirmation.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
168	<i>Licence Condition Clauses 3.8.1 and 3.8.2</i> 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	Stantec confirmed that Busselton Water did not receive any directions from ERA relating to this obligation. Consequently, this obligation is not rated.	N/P	N/R
169	<i>Licence Condition Clause 3.7.1</i> Unless otherwise specified, all notices must be in writing.	4	Stantec confirmed with Busselton Water representatives that all notices are in writing.	N/P	1
171	<i>Licence Condition Clause 5.1.3</i> The licensee must notify the ERA of any material change to the asset management system within 10 business days of the change.	3	Stantec confirms that material changes were not made to the Asset Management System during the audit period.	N/P	N/R
172	<i>Licence Condition Clause 5.1.7</i> 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	Stantec confirms that Busselton Water representatives were very cooperative during the audit and complied with the applicable guidelines.	N/P	1
172A	<i>Licence Condition Clause 6.1.1</i> 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 to do so within a specified period.	4	The ERA has not provided any directions regarding this obligation. Consequently, it is not rated.	N/P	N/R
172B	<i>Licence Condition Clause 6.1.2</i> The licensee must comply with a direction given to the licensee under clause 6.1.1.	4	Stantec has confirmed with Busselton Water representatives that any directions given by ERA are complied with.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
182	<i>Licence Condition Clause 4.4.1(b)</i> 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	Stantec has confirmed with Busselton Water that a water service was not provided outside of the operating area.	N/P	N/R
184	<i>Licence Condition Clause 7.1.1</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.	4	Stantec confirmed that Busselton Water entered into an MOU with Department of Health on 23/12/2019.	N/P	1
185	<i>Licence Condition Clause 7.1.4</i> 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	Stantec have confirmed with Busselton Water that an audit of the MOU was not requested during the audit period.	N/P	1
186	<i>Licence Condition Clause 7.1.5</i> The licensee must comply with the terms of a Memorandum of Understanding.	4	- Stantec observed that under the terms of the MOU, Busselton Water is required to ensure that the Memorandum is reviewed and renewed not less than once every five years. - Stantec confirmed with General Manager Operations and Planning that the updated MOU has been submitted to Department of Health for review and will be signed on 6/06/2025 at the next quarterly meeting. - Stantec considers that Busselton Water has complied with the terms of the MOU.	N/P	1
187	<i>Licence Condition Clause 7.1.6</i> The licensee must publish in the form agreed with the Department of Health, a Memorandum of Understanding and any amendments to a Memorandum of Understanding within one month of signing or making the amendment.	4	Stantec confirmed that the MOU with Department of Health is published on Busselton Water's website. There have been no amendments to the MOU.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
188	<i>Licence Condition Clause 7.1.7</i> 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.	4	Stantec confirmed with Busselton Water that an audit of the obligations under the MOU was not undertaken during the audit period.	N/P	N/R
189	<i>Licence Condition Clause 7.1.8</i> 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	Stantec confirmed with Busselton Water that quarterly and annual water quality reports are published as per Department of Health requirements. The reports are publicly available on Busselton Water's website.	N/P	1
190 (2021)	<i>Licence Condition Schedule 2</i> The licensee must comply with the standards set out in Schedule 2 of the licence.	4	- Stantec confirmed that Busselton Water has appropriate policies, procedures and standards in place to comply with the standards set out in Schedule 2. - Information is provided on Busselton Water's website to inform customers of flow and pressure supply standards. - Performance is monitored and included in the General Manager Operations and Planning Monthly Report. - The Pipeline Construction and Design Standard sets out the requirements for design, construction and testing of water supply networks. - The Operations and Planning Work Instruction Manual includes procedures such as 'Investigate and Correct Poor Water Pressure'. - Stantec considers that these measures ensure compliance with this obligation.	N/P	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
190A (2024)	<i>Licence Condition Schedule 2 Clause 1.1</i> The water service works provided by the licensee, for the purpose of water supply services, shall be designed, constructed, operated and maintained to provide continuity of pressure and flow for the services in accordance with the specified standards in Schedule 2.	4	Refer obligation 190 (2021)	N/P	1
190B (2024)	<i>Licence Condition Clause Schedule 2 Clause 1.2</i> The licensee must notify: - new customers upon purchase of the affected property as soon as practicable; and - existing customers at least annually, if the pressure and flow of the water supplied to the customer's property falls outside of the pressure and flow range standards specified in Schedule 2 clause 1.1.	4	Stantec confirmed with General Manger Operations and Planning that no properties fall outside the pressure and flow standards. Consequently, this obligation has not been rated.	N/P	N/R
190C (2024)	<i>Licence Condition Clause Schedule 2 Clause 1.3</i> The licensee must notify the ERA annually of any restrictions applied in accordance with the Water Services Regulations 2013 to a potable water supply, detailing restrictions by scheme, type (severity), duration, start date and number of services affected.	4	Stantec confirmed that Busselton Water has not applied any restrictions to the potable water supply. Consequently, this obligation has not been rated.	N/P	N/R
Water Services Code of Practice (Family Violence) 2020					
191	<i>Water Services Code of Practice (Family Violence) 2020 Clause 5(1)</i> The licensee must have a family violence policy that sets out the matters specified in clause 5(1).	1	- Stantec confirmed that Busselton Water has a Family Violence Policy in place. The Manager Customer Service outlined the approach to responding to a customer affected by family violence which includes referral to a senior customer support officer (case manager). - Training is provided to customer support staff and this was confirmed by viewing the Training Plan for 2024/25. - The billing system (AquaRate) includes functionality to lock the account of a customer affected by family violence and provide a 'forced note'.	B	2



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
			- 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. Recommendation A2/2025 - 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:: - 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 Recommendation A3/2025 - 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.		



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
192	<i>Water Services Code of Practice (Family Violence) 2020 Clause 5(2)</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.	2	Stantec confirmed that policy was issued within the required timeframe in May 2021.	A	1
193	<i>Water Services Code of Practice (Family Violence) 2020 Clause 6</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.	2	Stantec confirmed with Manager Customer Service that hard copies of the policy are available on request at no charge (no requests have been made to date). The policy is available via the customer support and assistance page on Busselton Water's website.	A	1
194	<i>Water Services Code of Practice (Family Violence) 2020 Clause 7</i> 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.	2	- Stantec confirmed that the review period of the policy is "at least every 5 years". The next review date in May 2026. - Busselton Water has not been directed by the Minister to review the policy.	A	1
195	<i>Water Services Code of Practice (Family Violence) 2020 Clause 8(1)</i> A licensee must maintain adequate records in relation to compliance with this code or any policy made under the code. If the licensee is a government organisation, as defined in section 3(1) of the State Records Act 2000 (WA), then records must be maintained in accordance with its obligations under that Act.	2	Stantec has confirmed with the Manager Customer Service that appropriate records are kept in the billing system (AquaRate) and document management system.	A	1



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Ref No.	Licence reference & Summary of licence obligation	Audit priority	Observations and recommendations	Controls rating	Compliance Rating
197	<i>Water Services Code of Practice (Family Violence) 2020 Clause 9</i> 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.	2	- Stantec has confirmed with the Manager Customer Service that customers are informed of the complaints procedure. However, there is insufficient evidence to provide a compliance rating. - Furthermore, there is no documented procedure for customer service staff to follow with respect to family violence cases. For this reason, Stantec have assessed the controls as inadequate. Recommendation A4/2025 - 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.	C	N/R
198	<i>Water Services Code of Practice (Family Violence) 2020 Clause 10</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.	2	Stantec confirmed that a 'Legislation' link to the current version of the code is provided on the family violence page of Busselton Water's website.	A	1



3.6 Audit recommendations

Under Section 5.1.8 of the ERA's 2019 Audit and Review Guidelines – Water Licences, recommendations on actions the licensee should take to address are required to be included for:

- Compliance rating – licence obligations that were rated non-compliant (rating 2, 3 or 4).
- Controls rating – licence obligations that were rated C or D.

A. Resolved during current Audit period			
Manual Ref.	Non-Compliance / Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Date Resolved (& management action taken)	Auditors' comments
149A	<i>Water Services Code of Conduct (Customer Service Standards) 2018 Clause 47 and 2024 Clause 50</i> 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. Busselton Water reported in their 2021/22 compliance report that 3 out of 19 complaints were not sent close-out letters.	June 2022 Manager Customer Service commenced monthly review of the complaints register.	Stantec confirmed that customer complaint records are exported from AquaTact into the Complaint Register on a monthly basis. This allows Manager Customer Service to monitor status and ensure compliance with the code.



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A. Resolved during current Audit period			
Manual Ref.	Non-Compliance / Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Date Resolved (& management action taken)	Auditors' comments
165	<i>Licence Condition Clause 4.8.1</i> 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. 2022 Water Sewerage and Irrigation Licence Performance Reporting Datasheets submitted to ERA late. Due 10 October 2022, submitted 18 October 2022	Added to Manager Customer Service calendar as a recurring item to be completed each year and printed & displayed on MCS board in office. Manager Customer Service added to ERA mailing list to be advised of future due dates.	Stantec confirmed that appropriate controls are in place to prevent this from recurring.

B. Unresolved during current Audit period			
Reference (no./year)	Non-Compliance / Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditor's recommendation	Management action taken by end of Audit period
A1/2025	Obligation 154AA (2024) (B2) <i>Water Services Code of Conduct (Customer Service Standards) 2024 Clause 52(3)</i> A licensee must ensure that the specified information about Part 9 may be obtained from its website. Stantec could not locate the specified information about the preserved supply register on Busselton Water's website.	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)	



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B. Unresolved during current Audit period			
Reference (no./year)	Non-Compliance / Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditor's recommendation	Management action taken by end of Audit period
A2/2025	Obligation 191 (B2) <i>Water Services Code of Practice (Family Violence) 2020 Clause 5(1)</i> The licensee must have a family violence policy that sets out the matters specified in clause 5(1). 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.	- 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: - 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	
A3/2025	Obligation 191 (B2) <i>Water Services Code of Practice (Family Violence) 2020 Clause 5(1)</i> The licensee must have a family violence policy that sets out the matters specified in clause 5(1). 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.	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.	



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B. Unresolved during current Audit period			
Reference (no./year)	Non-Compliance / Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditor's recommendation	Management action taken by end of Audit period
A4/2025	Obligation 197 (CN/R) <i>Water Services Code of Practice (Family Violence) 2020 Clause 9</i> 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. There is no documented procedure for customer service staff to follow with respect to family violence cases.	- 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	



4 Asset management review

4.1 Review overview

The review of Busselton Water's asset management system occurred at the same time as the audit. The comments made in section 3.1 are also applicable to the review.

4.2 Asset management system review scope

The scope of the review was an assessment of the adequacy and effectiveness of Busselton Water's asset management system by evaluating the following 12 key asset management processes:

- | | |
|-------------------------------|---|
| 1. Asset planning | 7. Asset Management Information System |
| 2. Asset creation/acquisition | 8. Risk management |
| 3. Asset disposal | 9. Contingency Planning |
| 4. Environmental analysis | 10. Financial Planning |
| 5. Asset operations | 11. Capital expenditure planning |
| 6. Asset maintenance | 12. Review of the asset management system |

Each asset management process has corresponding effectiveness criteria which were individually rated against two measures:

- Process and policy definition
- Performance

The effectiveness criteria are detailed in the Audit and Review Guidelines.

The following key documents were reviewed to undertake the asset management system review:

- Asset Management Policy
- Asset Management System Framework (AMSF)
- Water System Guiding Framework (WSGF)
- Strategic Asset Plan (SAP)
- Asset Management Procedures (P18)
- Operations and planning work instruction manual



4.3 Previous review deficiencies and recommendations

The previous review did not identify any deficiencies or recommendations regarding Busselton Water's asset management system.

4.4 Review effectiveness summary

The asset management system review assessed the effectiveness of the asset management system in delivering the services as required under the operating licence.

The review was conducted utilising the asset management adequacy and performance ratings as outlined in the Audit Guidelines. The overall effectiveness rating for each process is determined by combining the ratings for each effectiveness criterion. Our approach is to only provide an 'A1' for the process if all criteria are rated 'A1'.

A summary of the outcomes of the review is provided in Table 12.

Table 12: Asset management review effectiveness summary

Asset management process & effectiveness criteria	Asset management process and policy rating	Asset management performance rating
Asset planning	A	1
Asset management plan covers key requirements	A	1
Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning	A	1
Service levels are defined in the asset management plan	A	1
Non-asset options (e.g., demand management) are considered	A	1
Lifecycle costs of owning and operating assets are assessed	A	1
Funding options are evaluated	A	1
Costs are justified and cost drivers identified	A	1
Likelihood and consequences of asset failure are predicted	A	1
Plans are regularly reviewed and updated	A	1
Asset creation/acquisition	A	1
Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	A	1
Evaluations include all life-cycle costs	A	1
Projects reflect sound engineering and business decisions	A	1
Commissioning tests are documented and completed	A	1
Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	A	1



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Asset management review

Asset management process & effectiveness criteria	Asset management process and policy rating	Asset management performance rating
Asset disposal	A	1
Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
Disposal alternatives are evaluated	A	1
There is a replacement strategy for assets	A	1
Environmental analysis	A	1
Opportunities and threats in the system environment are assessed	A	1
Performance standards (availability of service, capacity, continuity, emergency response, etc) are measured and achieved	A	1
Compliance with statutory and regulatory requirements	A	1
Service standard (customer service levels etc) are measured and achieved	A	1
Asset operations	A	1
Operational policies and procedures are documented and linked to service levels required	A	1
Risk management is applied to prioritise operations tasks	A	1
Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition	A	1
Accounting data is documented for assets	A	1
Operational costs are measured and monitored	A	1
Staff resources are adequate, and staff receive training commensurate with their responsibilities	A	1
Asset maintenance	A	1
Maintenance policies and procedures are documented and linked to service levels required	A	1
Regular inspections are undertaken of asset performance and condition	A	1
Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	A	1
Failures are analysed and operational / maintenance plans adjusted where necessary	A	1
Risk management is applied to prioritise maintenance tasks	A	1
Maintenance costs are measured and monitored	A	1
Asset management information system	A	1



Audit and review report
Asset management review

Asset management process & effectiveness criteria	Asset management process and policy rating	Asset management performance rating
Adequate system documentation for users and IT operators	A	1
Input controls include appropriate verification and validation of data entered into the system	A	1
Logical security access controls appear adequate, such as passwords	A	1
Physical security access controls appear adequate	A	1
Data backup procedures appear adequate, and backups are tested	A	1
Computations for licensee performance reporting are accurate	A	1
Management reports appear adequate for the licensee to monitor licence obligations	A	1
Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	A	1
Risk management	A	1
Risk management policies and procedures exist and are being applied to minimise internal and external risks	A	1
Risks are documented in a risk register and treatment plans are implemented and monitored	A	1
The probability and consequence of risk failure are regularly assessed	A	1
Contingency planning	A	1
Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	A	1
Financial planning	A	1
The financial plan states the financial objectives and identifies strategies and actions to achieve those	A	1
The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period	A	1
The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
Capital expenditure planning	A	1



Audit and review report
Asset management review

Asset management process & effectiveness criteria	Asset management process and policy rating	Asset management performance rating
There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
There is an adequate process to ensure that the capital expenditure plan is regularly updated and implemented	A	1
Review of AMS	A	2
A review process is in place to ensure the asset management plan and the asset management system described in it remain current	A	2
Independent reviews (e.g., internal audit) are performed of the asset management system	A	1



4.5 Detailed review observations

Table 13: Asset management system review observations

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
1	Asset planning Asset planning strategies focuses on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).			A	1
1.1	Asset management plan covers the processes in this table	4	- Busselton Water's Strategic Asset Plan (SAP) addresses the processes in this table. As a state government agency, Busselton Water is required to comply with the Western Australian Government Strategic Asset Management Framework. (SAMF). The SAMF provides a template and guidelines for creating the SAP. - The Asset Management Framework (AMF) is Busselton Water's overarching document that describes the asset management system. - Busselton Water has an Asset Management Policy (P18) that was issued 17/03/2025 to ensure that assets are effectively managed across the complete asset lifecycle in a safe, efficient, co-ordinated, and environmentally sensitive manner.	A	1
1.2	Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning	4	- The Asset Management procedures manual (P18) is integrated with Busselton Water's business management framework of policies and procedures. Key planning procedures include: - Scan business environment and drivers - Plan infrastructure system upgrades - Manage capital programs - Register capital requirements - Develop asset investment plan - Maintain assets - Utilise (operate) assets - Planning objectives are documented within the SAP which provide a line of sight to Busselton Water's Strategic Plan and the WA State Infrastructure Strategy (SIS). This approach is considered to be good practice.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
1.3	Service levels are defined in the asset management plan	4	- Levels of service are defined within the SAP (Table 8 BW Existing Infrastructure Asset Portfolio – Portfolio Performance against Customer Levels of Service (LoS)). - Busselton Water's customer charter 'Our Customer Commitments' also contains levels of service commitments pertaining to flow, pressure and water quality.	A	1
1.4	Non-asset options (e.g., demand management) are considered	4	Demand management is the key non-asset solution and is executed through programs such as Water for Tomorrow. Customers are educated on the importance of managing consumption through water saving tips and addressing leaks.	A	1
1.5	Lifecycle costs of owning and operating assets are assessed	4	- The Asset Management Framework 2025 document provides a strategic perspective on the framework implemented across all areas of Busselton Water's services. It emphasises the importance of achieving a balance of costs, risks, and benefits over different timescales, which includes asset operation, maintenance, and forward planning. This indicates that lifecycle costs are considered in the decision-making process. - Additionally, the Asset Management Procedure (P18) outlines the procedures for managing capital programs, developing asset investment plans, and estimating operating costs. These procedures ensure that the lifecycle costs of assets are assessed and factored into the overall asset management strategy. - These documents demonstrate that Busselton Water has a systematic process in place for assessing the lifecycle costs of owning and operating assets.	A	1



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Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
1.6	Funding options are evaluated	4	- The Project Delivery Procedure (P19) outlines a structured process for evaluating, approving, and monitoring capital investment proposals and projects. This procedure includes the assessment of financial viability and funding options by the Finance Department. The document also details the submission of a business case, which includes estimated costs and funding sources. - Additionally, the Asset Management Procedure (P18) emphasises the importance of recording the scope, estimated cost, and expenditure timeframe for all investments required to meet business needs over the next 1 to 30 years. This procedure ensures that funding options are considered and evaluated as part of the capital program management process. - These documents demonstrate that Busselton Water has a systematic process in place for evaluating funding options for capital investments.	A	1
1.7	Costs are justified and cost drivers identified	4	As per above, the capital works program highlights the relevant cost drivers such as climate adaptation, growth, renewal, quality and standards (compliance).	A	1
1.8	Likelihood and consequences of asset failure are predicted	4	- Asset risk is managed via the State of the Assets (SotA) PowerBI dashboard. Key asset health data is exported from Confirm and analysed with deterioration modelling to provide risk identification and forecasting. - The SotA dashboard considers the asset consequence of failure (criticality) and probability of failure (health) to calculate an overall risk score. The dashboard provides an effective view of the asset portfolio risk to support asset lifecycle planning processes.	A	1
1.9	Plans are regularly reviewed and updated	4	- Stantec reviewed several asset management system artefacts and found that a rigorous review process is in place at Busselton Water. This is supported by an evident continuous improvement culture. - The Improve Asset Management System procedure (P18.PR010) describes the annual review process in detail which is coordinated by the Asset Information Officer.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
2	Asset creation/acquisition Asset creation/acquisition is the provision or improvement of assets.			A	1
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	4	- Busselton Water undertakes full project evaluations for new assets, including comparative assessments of non-asset options. Stantec reviewed various infrastructure planning reports and business cases that are used to evaluate new projects. This also includes development planning reports, hydraulic reports, and a 30-year development example, which help in assessing the need for new assets and comparing them with non-asset options. - Additionally, the Asset Management Procedure (P18) describes the process of planning infrastructure upgrades and managing capital programs. This procedure involves reviewing the business justification, scale, and timing of proposed capital project investments, and in justified cases, adding proposals to the corporate capital works program. This ensures that all potential options, including non-asset solutions, are considered before making investment decisions. - These documents collectively demonstrate that Busselton Water conducts thorough evaluations for new assets, including comparative assessments of non-asset options, to ensure that the most effective and efficient solutions are implemented.	A	1
2.2	Evaluations include all life-cycle costs	4	- The SAP outlines the strategic context and alignment for Busselton Water's asset management, including detailed business cases for various projects. These business cases incorporate all life-cycle costs, ensuring that the financial implications of acquiring, operating, maintaining, and disposing of assets are thoroughly evaluated. - Additionally, the Project Delivery Procedure (P19) specifies the procedures for estimating a project's capital cost and managing capital project delivery. This includes tracking and reporting project progress, actual costs, budgeted costs, and estimated costs at completion. The procedure ensures that all life-cycle costs are considered during project evaluations. - These documents collectively demonstrate that Busselton Water conducts comprehensive evaluations of projects, including all life-cycle costs, to ensure effective and efficient asset management.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
2.3	Projects reflect sound engineering and business decisions	4	- Busselton Water's projects reflect sound engineering and business decisions. The Asset Management Framework 2025 outlines the strategic context and alignment for Busselton Water's asset management. This framework ensures that projects are planned and executed based on thorough evaluations and sound engineering principles. - Additionally, the capital works program includes detailed business cases for various projects, such as the Smart Metering Business Case, Inland Bore-Field Transition (Plant 8) Business Case, and Dunsborough Bulk Water Transfer Upgrade Business Case. These business cases provide comprehensive assessments of the projects, including their strategic importance, financial implications, and expected outcomes. - The Asset Management Procedure (P18) further emphasises the importance of scanning the business environment and reviewing business drivers to refine capital and operational planning. This procedure ensures that projects are aligned with current and future requirements, considering factors such as asset condition, capacity, demand trends, and environmental performance. - These documents collectively demonstrate that Busselton Water's projects are based on sound engineering and business decisions, ensuring effective and efficient asset management.	A	1
2.4	Commissioning tests are documented and completed	3	Busselton Water ensures that commissioning tests are documented and completed as part of their asset management system. The Asset Management Procedure (P18) outlines the purpose and objectives of Busselton Water's Asset Management System, which includes the establishment, implementation, and maintenance of all assets. This procedure ensures that commissioning tests are systematically documented and completed to align with Busselton Water's various licenses and legislative requirements.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	4	- Busselton Water ensures that ongoing legal, environmental, and safety obligations are assigned and understood as part of their asset management system. - Regarding environmental obligations, the Environmental Management Procedure (P13) details Busselton Water's Environmental Management System (EMS), which is aligned with ISO 14001. This procedure includes defining roles, responsibilities, and authorities with respect to environmental aspects, ensuring that environmental obligations are understood and maintained. - For safety obligations, the Health, Safety and Wellbeing Procedures (P06) outlines Busselton Water's commitment to managing health, safety, and wellbeing through the implementation of the Work, Health, and Safety Policy. This procedure includes maintaining a Safety Management Plan and providing access to relevant legislation and guidelines. - These documents collectively demonstrate that Busselton Water assigns and understands ongoing legal, environmental, and safety obligations, ensuring compliance and effective management across their operations.	A	1
3	Asset disposal Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets.			A	1
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	4	- Busselton Water's Asset Replacement and Disposal procedure (P18.PR013) aims to ensure that an asset is replaced and disposed of at the most optimum, economical and/or conditionally appropriate time of its life cycle. This will ensure the efficient and effective management of BW's assets. - Busselton Water systematically reviews asset performance annually as per the Scan Business Environment and Driver procedure (P18.PR02). Underperforming assets are identified during the 'Review Asset Condition' step. - The SAP identifies assets that require disposal.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	4	- Stantec examined the Plant 8 Business Case - December 2024 which outlines the Inland Bore-Field Transition (Plant 8) Project by Busselton Water. The project aims to transition to an inland bore-field to ensure a sustainable water supply. - The business case highlights several reasons for the poor performance of Plant 8 including aging infrastructure, water quality issues, and operational inefficiencies. - To address these issues, the following corrective actions will be taken, infrastructure upgrade, implementation of Advanced Technology, enhanced water treatment processes. - This business case demonstrates that Busselton Water critically examines the reasons for poor performance and undertakes appropriate corrective action or disposal.	A	1
3.3	Disposal alternatives are evaluated	4	Disposal of assets is the responsibility of the Supply Officer who will evaluate options and recommend disposal for approval by the relevant Manager/CEO.	A	1
3.4	There is a replacement strategy for assets	4	The bulk of Busselton Water's end of useful life, obsolete, under-utilised and underperforming infrastructure assets are identified or forecast to expire through the Asset Management System (AMS). Asset replacements are budgeted in both the 10 Year Capital works/ Operations Plan and annual budget.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
4	Environmental analysis Environmental analysis examines the asset management system environment and assesses all external factors affecting the asset management system.			A	1
4.1	Opportunities and threats in the system environment are assessed	4	- Busselton Water's analysis of the external environment includes assessing opportunities and threats in the organisational environment. The Policy Statement Manual 2025 outlines Busselton Water's commitment to delivering water services safely, sustainably, and commercially, while collaborating with customers. This manual includes a comprehensive policy framework that addresses various aspects such as enterprise risk management, business improvement, and environmental management. - Additionally, the Enterprise Risk Management - Procedure (P02) provides a detailed framework for identifying, analysing, and evaluating risks, including those related to the organisational environment. This procedure ensures that operational incidents and safety incidents are managed effectively, with clear responsibilities assigned to various roles within the organisation. - These documents collectively demonstrate that Busselton Water effectively assesses opportunities and threats in their organisational environment, ensuring compliance and effective management across their operations.	A	1
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc) are measured and achieved	4	- Busselton Water does measure and achieve performance standards related to availability of service, capacity, continuity, and emergency response. - The General Manager Operations and Planning Monthly Report - April 2025 includes detailed sections on key performance outcomes, network pressure, continuity of supply, operational incidents, and treatment plant performance. These sections highlight the ongoing monitoring and achievement of performance standards in various operational areas. - Furthermore, the Water System Guiding Framework outlines the standards for hydraulic service levels, continuity of supply, emergency storage, and critical disinfection systems. This framework ensures that performance standards are clearly defined and measured. - These documents demonstrate that Busselton Water has a systematic process in place for measuring and achieving performance standards related to availability of service, capacity, continuity, and emergency response.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
4.3	Compliance with statutory and regulatory requirements	4	- Busselton Water monitors compliance with statutory and regulatory requirements as part of their asset management system. - The Policy Statement Manual 2025 outlines Busselton Water's policy framework, which includes compliance with statutory and regulatory requirements. This manual is reviewed and updated annually to ensure that all policies, procedures, and work instructions are aligned with the latest regulatory standards. - Additionally, the annual ERA Compliance Reports confirm that Busselton Water has complied with its licence obligations and outlines actions taken to prevent recurrence of any breaches. This report further demonstrates the organisation's commitment to monitoring and maintaining compliance with statutory and regulatory requirements. - These documents demonstrate that Busselton Water has a systematic process in place for monitoring compliance with statutory and regulatory requirements.	A	1
4.4	Service standard (customer service levels etc) are measured and achieved	4	- Busselton Water measures and achieves service standards related to customer service levels. - The Customer Service Procedure (P10) outlines Busselton Water's approach to delivering excellence within customer service. It includes sections on meter replacement, temporary water service connection, and AquaRate user access review. This procedure ensures that customer service standards are clearly defined and measured. - Furthermore, the Our Customer Commitment charter provides a clear statement of intent to customers about service standards. - These documents demonstrate that Busselton Water has a systematic process in place for measuring and achieving service standards related to customer service levels.	A	1
5	Asset operations Asset operations is the day-to- day running of assets (where the asset is used for its intended purpose).			A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
5.1	Operational policies and procedures are documented and linked to service levels required	4	- Busselton Water's operational policies and procedures are documented and linked to service levels. The Policy Statement Manual 2025 outlines Busselton Water Corporation's policy statements set out in their policy framework, which links policies to business objectives. This manual includes various policies, procedures, and work instructions that support the Corporate Planning Framework, ensuring that operational activities are aligned with service levels. - Additionally, the Asset Management Procedure (P18) emphasises the importance of deriving optimal value from existing assets and maximising service delivery performance while minimising operating costs. This procedure ensures that asset management activities are linked to service levels, aligning with best practices as documented in ISO 55000. - These documents collectively demonstrate that Busselton Water's operational policies and procedures are well-documented and linked to service levels, ensuring effective and efficient service delivery.	A	1
5.2	Risk management is applied to prioritise operations tasks	4	Stantec reviewed work prioritisation with Team Leader Networks and can confirm that operation tasks are appropriately prioritised according to risk.	A	1
5.3	Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition	4	- Busselton Water maintains an Asset Register in Confirm that includes detailed information about assets such as asset type, location, material, plans of components, and an assessment of their physical/structural condition. - Stantec reviewed an extract of the Asset Register as of 9 May 2025 and confirmed it provided a comprehensive list of assets, including details like asset type, location, material, and other relevant information. This document is a clear indication that Busselton Water systematically documents and maintains an Asset Register. - Additionally, the State of the Assets PowerBI Dashboard includes an amalgamated asset register extract with assigned attributes to unique IDs, such as unit type, install date, diameter/length/material, condition, and current replacement cost. This further supports the fact that Busselton Water assesses and documents the physical and structural condition of their assets. - These documents demonstrate that Busselton Water has a systematic process in place for documenting assets in an Asset Register, including all the necessary details.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
5.4	Accounting data is documented for assets	4	Busselton Water maintains a financial asset register in Synergy Soft that is compliant with Australian accounting standards.	A	1
5.5	Operational costs are measured and monitored	4	Operational costs are budgeted and monitored by General Manager Operations and Planning.	A	1
5.6	Staff resources are adequate, and staff receive training commensurate with their responsibilities	4	Stantec considers that the staff resources at Busselton Water are adequate for the size and scale of their operations. Stantec attending a monthly toolbox talk with operational staff and it was evident from this meeting and follow up discussions that staff are adequately trained to perform their duties.	A	1
6	Asset maintenance Asset maintenance is the upkeep of assets.			A	1
6.1	Maintenance policies and procedures are documented and linked to service levels required	4	- Busselton Water's maintenance procedures are indeed linked to levels of service. The Asset Management Framework 2025 outlines the desired levels of service and how they are integrated into the operation and maintenance of assets. This framework ensures that maintenance activities are aligned with the service levels expected by customers and regulatory requirements. - Additionally, the Asset Management Procedure (P18) describes how the asset management system is designed to establish, implement, and maintain all assets while continually improving the system. This procedure aligns with ISO 55000 - Asset Management, which emphasises the importance of coordinated activities to realise value from assets in delivering outcomes or objectives. - These documents collectively demonstrate that Busselton Water's maintenance procedures are closely linked to their levels of service, ensuring that the organisation meets its service delivery goals while maintaining compliance with relevant standards and regulations.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
6.2	Regular inspections are undertaken of asset performance and condition	4	- Regular inspections of asset performance and condition are undertaken as part of Busselton Water's asset management system. The Asset Management Framework 2025 outlines the procedures for monitoring and assessing asset performance and condition. This framework ensures that assets are regularly inspected to maintain their optimal performance and condition. - Inspections are detailed in the Operations and Planning Work Instruction which are then scheduled with the Confirm system. - Additionally, the Asset Management Procedure (P18) specifies that Busselton Water's asset management system aims to establish, implement, and maintain all assets while continually improving the system. - These documents collectively demonstrate that regular inspections are a key component of Busselton Water's asset management system, ensuring that assets are maintained in good condition and perform as expected.	A	1
6.3	Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	4	- Busselton Water's maintenance plans, including emergency, corrective, and preventative maintenance, are documented and completed on schedule. The Operations and Planning Work Instruction Manual outlines various work instructions related to maintenance activities, ensuring that they are systematically documented and followed. This manual includes instructions for installing, repairing, and modifying water services, as well as investigating and correcting issues such as poor water pressure. - A maintenance plan is called a 'Regime' in Confirm terminology. Stantec was provided with a list of regimes for review. - Additionally, the General Manager Operations and Planning Monthly Report provides insights into the completion of work orders and network maintenance activities. This report highlights the importance of maintaining continuity of supply and network pressure, which are critical aspects of Busselton Water's maintenance plans. - The Borefield Maintenance Operating Strategy document further emphasises the implementation of a preventative maintenance schedule, which is regularly revised to ensure efficient and uninterrupted operation of the borefield. This schedule is developed in consideration of local hydrogeology and integrates with Busselton Water's operations. - These documents collectively demonstrate that Busselton Water's maintenance plans are well-documented and completed on schedule, ensuring the reliability and performance of their assets.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
6.4	Failures are analysed and operational / maintenance plans adjusted where necessary	4	- Busselton Water ensures that failures are analysed and operational/ maintenance plans are adjusted accordingly. - The Asset Management Procedure (P18) emphasizes the importance of continually improving the asset management system by analysing failures and adjusting maintenance plans as necessary. - These documents demonstrate that Busselton Water has a robust process for analysing failures and adjusting operational and maintenance plans to ensure the reliability and performance of their assets.	A	1
6.5	Risk management is applied to prioritise maintenance tasks	4	The Borefield Maintenance Operating Strategy outlines the procedures for identifying and mitigating risks associated with unexpected events. This includes preparing a Job Hazard Analysis (JHA) or a Safe Working Method Statement (SWMS) for each bore maintenance activity, ensuring that all personnel are aware of the procedures and risk mitigation strategies.	A	1
6.6	Maintenance costs are measured and monitored	4	- Busselton Water measures and monitors maintenance costs as part of their asset management system. The Cost of Service Procedure (P17) outlines the procedures for tracking and managing costs associated with water mains and other services. This ensures that all costs are accurately recorded and monitored to maintain financial accountability. - Additionally, the General Manager Operations and Planning Monthly Report provides detailed insights into the value of quotations issued and paid for various maintenance activities. This report highlights the importance of tracking maintenance costs to ensure that they are within budget and aligned with the organization's financial goals. - These documents demonstrate that Busselton Water has a robust system in place for measuring and monitoring maintenance costs, ensuring financial transparency and accountability.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
7	Asset management information system An asset management information system is a combination of processes, data and software supporting the asset management functions.			A	1
7.1	Adequate system documentation for users and IT operators	4	- Busselton Water are using Brightly's Confirm as their enterprise asset management information system. Field workers access the system using tablets loaded with Confirm Connect. - The Operations and Planning Work Instruction Manual includes a dedicated section for Confirm usage. This manual demonstrates that there is adequate system documentation in place.	A	1
7.2	Input controls include suitable verification and validation of data entered into the system	4	Stantec reviewed input controls with the Asset Information Officer and confirm that they are suitable.	A	1
7.3	Security access controls appear adequate, such as passwords	4	Stantec reviewed access controls with the Asset Information Officer and confirm that they are adequate. The security controls include password and role-based access levels.	A	1
7.4	Physical security access controls appear adequate	4	Stantec visited Busselton Water's head office building and Plant 2, and we can confirm that adequate physical access controls are in place to prevent unauthorised entry.	A	1
7.5	Data backup procedures appear adequate, and backups are tested	4	Stantec confirm that data backup procedures appear adequate.	A	1
7.6	Computations for licensee performance reporting are accurate	4	All reporting generated from Confirm data is generated by the Field Services Officer. All reports are reviewed for accuracy by the relevant manager.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
7.7	Management reports appear adequate for the licensee to monitor licence obligations	4	- The General Manager Operations and Planning Monthly Report is prepared by the Field Services Officer from validated data sources such as Confirm. The report includes key performance data and information about the asset management activities and performance of the water supply assets. - The report includes key reportable business targets related to licence obligations. Detailed trend charts are provided for key water supply performance measures to enable timely intervention to be taken by management as required. - Stantec confirm that this report is adequate for Busselton Water to monitor licence obligations.	A	1
7.8	Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	4	Stantec can confirm that adequate measures are in place with building security and electronic security measures in place.	A	1
8	Risk management Risk management involves the identification of risks and their management within an acceptable level of risk.			A	1
8.1	Risk management policies and procedures exist and are being applied to minimise internal and external risks	4	- The Policy Statement Manual 2025 document describes Busselton Water's Enterprise Risk Management System (ERMS), which includes risk appetite, risk management, risk treatment, business continuity, and fraud and corruption. The ERMS empowers management to make effective risk-based decisions and operate within acceptable and agreed levels of risk. - Furthermore, the P02 Enterprise Risk Management - Procedure document outlines the purpose of the risk management process, which is to mitigate risks associated with all aspects of business activities in a structured manner. This procedure ensures that risk management is consistently applied across business activities and is scrutinised as part of internal and external audits. Additionally, the document mentions the establishment and maintenance of a Business Continuity Management Plan (BCMP) and Emergency Response Plans (ERP) with annual reviews. - Busselton Water has an Enterprise Risk Management Policy (P2) that is aligned to AS/NZS ISO 31000:2108 with an associated Enterprise Risk Management procedures manual. - The SynergySoft application is used to manage the risk register and associated actions. The risk register is routinely reviewed.	A	1



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Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
8.2	Risks are documented in a risk register and treatment plans are implemented and monitored	4	The process of systematically identifying, assessing and treating corporate and operational risks is conducted by the Asset Information Officer with respective managers, and any specialist staff required for their expertise. They meet bi-annually to develop and review the risk register as a team through appropriate consultation, consideration and endorsement. Treatment plans are monitored and reviewed as part of this meeting.	A	1
8.3	The probability and consequence of risk failure are regularly assessed	4	- Asset risk is managed via the State of the Assets (SotA) PowerBI dashboard. Key asset health data is exported from Confirm and analysed with deterioration modelling to provide risk identification and forecasting. - The SotA dashboard considers the asset consequence of failure (criticality) and probability of failure (health) to calculate an overall risk score. The dashboard provides an effective view of the asset portfolio risk to support asset lifecycle planning processes.	A	1
9	Contingency planning Contingency plans document the steps to deal with the unexpected failure of an asset.			A	1
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	3	- A Business Continuity Management Plan (BCMP) and Emergency Response Plans (ERP) are established and maintained with annual reviews. - Busselton Water has a mature contingency planning framework in place as evidenced by the Water Quality Incident Response Plans. This is a collection of incident response plans for different water quality incidents. Each plan outlines the roles and responsibilities for Busselton Water staff and the actions to be taken. - The plans are tested using mock emergency scenarios to assess the effectiveness of staff and incident response plans. Minutes from the simulated gas release mock event were made available for review. The event was attended by internal staff and key external stakeholders in March 2024. Actions were identified to improve the response plan.	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
10	Financial planning		Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term.	A	1
10.1	The financial plan states the financial objectives and identifies strategies and actions to achieve those	4	- The Financial Management Procedure (P16) outlines the purpose of the financial management process, which includes protecting investments while optimising returns. It details the delegation of authority, authorised investments, and guidelines for managing investments. This procedure ensures that financial objectives are clearly defined and that there are specific strategies and actions in place to achieve them. - Additionally, the SAP highlights Busselton Water's commitment to financial stability and sustainability. It mentions objectives such as achieving the lowest whole-of-life costs for customers, improving productivity, and transitioning to cost-reflective pricing for water and infrastructure funding. The document also outlines various investment activities and continuous improvement initiatives that contribute to meeting these financial objectives. - These documents demonstrate that Busselton Water has a comprehensive financial plan that states its financial objectives and identifies strategies and actions to achieve those objectives.	A	1
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs	4	Funds are sourced from revenue, capital other reserves and borrowing from the WA Treasury Corporation against an annual borrowing allowance. Some leasing is undertaken. The annual financial plans provide information on the source of all funds and the levels of proposed annual expenditure for the particular assets / asset types and year.	A	1
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	4	Profit and loss and balance sheet information is provided in Busselton Water's Water Fund Cash Budget Summary for 2024-2025. This budget summary is submitted and approved by WA Treasury. This budget summary provides a 10-year forecast of Busselton Water's financial position.	A	1
10.4	The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period	4	In addition to budget and actual information for the preceding two years, the plan provides estimates of income and expenditure for the forthcoming ten years	A	1



Audit and review report

Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	4	As stated above the plan provides for operation, maintenance, administration and capital expenditure for the forthcoming ten years	A	1
10.6	Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	4	A full summary of budget and actual income and expenditure (together with project progress) is provided to the Senior Executive Group (SEG) monthly. Appropriate action taken to address any discrepancies	A	1
11	Capital expenditure planning The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure for these works over the next five or more years. Since capital investments tend to be large and lumpy, projections would normally be expected to cover at least 10 years, preferably longer. Projections over the next five years would usually be based on firm estimates.			A	1
11.1	There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	4	- The Asset Management Procedure (P18) sets out the sequence of processes to be undertaken to register, develop and fund the Asset Investment Plan. - Investigations to be taken to identify the necessity for capital works, together with options available, timing, cost and financing. Reporting and approval procedure to Busselton Water management and Board are also outlined.	A	1
11.2	The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	4	Reasons for each capital expenditure item are included in the Asset Investment Plan. Recommendations are provided for inclusion of items in capital expenditure together with priority.	A	1
11.3	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	4	- Investigations leading to formation of the Asset Investment Plan include the annual assessment and reporting of condition of assets, their performance and age – which is recorded in Confirm. - For assets at or approaching their useful life a decision is made to either continue their maintenance, or to include a renewal project in the capital expenditure program.	A	1
11.4	There is an adequate process to ensure that the capital expenditure plan is regularly updated and implemented	4	Busselton Water's policy and procedures ensure capital expenditure plans are updated annually.	A	1



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Asset management review

Ref no	Asset Management Process or Effectiveness Criteria	Review priority	Observations and recommendations	Process and policy rating	Performance rating
12	Review of AMS The asset management system is regularly reviewed and updated.			A	2
12.1	A review process is in place to ensure the asset management plan and the asset management system described in it remain current	4	- Stantec reviewed several asset management system artefacts and found that a rigorous review process is in place at Busselton Water. This is supported by an evident continuous improvement culture. - The Improve Asset Management System procedure (P18.PR010) describes the annual review process in detail which is coordinated by the Asset Information Officer. - The Water System Guiding Framework (WSGF) is a key element of the Asset Management System. The last revision of the WSGF was 2/10/2019 and it should be reviewed and updated to ensure that it remains current and fit for purpose. This feedback was provided to Busselton Water.	A	2
12.2	Independent reviews (e.g., internal audit) are performed of the asset management system	4	- Busselton Water considers the Improve Asset Management System procedure (P18.PR010) to be their internal audit process. The last review was undertaken from February to April 2025 and improvements are reflected in the Asset Management Framework document and Asset Management Procedures. - This is supported by an independent review conducted every three years by an ERA appointed asset management assessor.	A	1



4.6 Review recommendations

Under Section 5.1.8 of the ERA's 2019 Audit and Review Guidelines - Water Licences, recommendations on actions the licensee should take to address when an asset management process or effectiveness criteria are required to be included for:

- Performance rating – Asset management processes or effectiveness criteria that were rated 3 or 4.
- Process and policy rating – Asset management processes or effectiveness criteria that were rated C or D.

A. Resolved during current audit period			
Ref.	Asset System Deficiency (Rating / Asset Management System Component & Effectiveness Criteria / Details of Asset System Deficiency)	Date Resolved (& management action taken)	Auditor's Comments
N/A	N/A	N/A	N/A

B. Unresolved at end of current Audit period			
Reference (no./year)	Asset System Deficiency (Rating / Asset Management System Component & Effectiveness Criteria / Details of Asset System Deficiency)	Auditor's recommendation	Management action taken by end of Audit Period
N/A	N/A	N/A	N/A



5 Confirmation of the audit and review

I confirm that the audit/review carried out at Busselton Water on 12-14 May 2025 and recorded in this report is an accurate presentation of our findings and opinions.



Brad Thompson

Stantec Pty Ltd

52 Merrivale Street

South Brisbane QLD 4101

4 July 2025





Appendices



Appendix A Rating scale definitions

A.1 Licence condition compliance rating scales

This report adopts the compliance rating scales, set out in Table 6 of the 2019 Audit and Review Guidelines - Water Licences (August 2022), to assess the licensee's compliance against each licence condition. The rating scale and description of compliance is reproduced below.

Table 14: Compliance and controls rating scales (audits)

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 effect on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate effect on customers or third parties
D	No controls evident	4	Non-compliant – major effect on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period

A.2 Asset management system effectiveness rating scales

This report adopts the process and policy, and performance rating scales, set out in Tables 9 and 10 of the 2019 Audit and Review Guidelines - Water Licences (August 2022), to assess the effectiveness of the asset management system. The rating scales are reproduced below.

Table 15: Process and policy rating scale (reviews)

Rating	Description	Criteria
A	Adequately defined	- 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 being managed.
B	Requires some improvement	- Processes and policies 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 substantial improvement	- Processes and policies are incomplete or require substantial improvement. - Processes and policies do not document the required performance of the assets.



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Appendix A Rating scale definitions

Rating	Description	Criteria
		- Processes and policies are considerably out of date. - The asset management information system(s) requires substantial improvements (taking into consideration the assets being managed).
D	Inadequate	- Processes and policies are not documented. - The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

Table 16: Performance rating scale (reviews)

Rating	Description	Criteria
1	Performing effectively	- 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	- The performance of the process requires some improvement to meet the required level. - Process effectiveness reviews are not performed regularly enough. - Recommended process improvements are not implemented.
3	Corrective action required	- The performance of the process requires substantial improvement to meet the required level. - Process effectiveness reviews are performed irregularly, or not at all. - Recommended process improvements are not implemented
4	Serious action required	Process is not performed, or the performance is so poor the process is considered to be ineffective.

Section 2





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Stantec is a global leader in sustainable engineering, architecture, and environmental consulting. The diverse perspectives of our partners and interested parties drive us to think beyond what's previously been done on critical issues like climate change, digital transformation, and future-proofing our cities and infrastructure. We innovate at the intersection of community, creativity, and client relationships to advance communities everywhere, so that together we can redefine what's possible.