

Post Audit and Post Review Implementation Plan August 2021

Performance Audit

Reference (No/year)	Non Compliance/Controls (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditor's Recommendation	Corrective Action to be Taken	Responsible Unit(s)	Due Date
2021 Operational Audit					
1/2021	- Number: 50; - Rating A2 174(1) 4.1.1 Notice of a proposed entry by the licensee must be in writing and must set out the purpose of the entry, including (if applicable) any work proposed to be carried out.	Recommendation 1/2021: The CKB must comply with the stipulations of section 174(1) of the Act by providing written notice of a proposed entry which set out the purpose of the entry, including (if applicable) any work proposed to be carried out.	Operating Procedure to be updated to reflect this stipulation.	Water Services	June 2022
2/2021	- Number: 51; - Rating A2 174(3) 4.1.1 Even if in a particular instance the licensee may enter a place under the Act without having to give notice of proposed entry, the licensee must when practicable, and when it will not compromise the reason for entry, give notice of entry to the occupier.	Recommendation 2/2021: The CKB must comply with the stipulations of section 174(3) of the Act in instances when it may enter a place without having to give notice by: Providing written notice of entry to the occupier; When practicable, and when it will not compromise the reason for entry.	Operating Procedure to be updated to reflect this stipulation.	Water Services	June 2022
3/2021	- Number: 55; - Rating A3 176(3) 4.1.1 The licensee must produce their certificate of authority if asked to do so, and must not perform, or continue to perform, a function under the Act if they are not able to do so.	Recommendation 3/2021: The CKB must issue its representatives with certificates of authority. These certificates should: Record the full name of the representative; and Refer to sections 115 and 116 of the Act.	Completed 17/3/2021. Individual Authorised Officer ID cards have been issued to Water Services Staff.	Water Services	Completed 17/3/2021
4/2021	Number: 65 to 72, 74, 75, 89, 92, 94, 95 to 98A, 101, 101A, 103 to 104, 104A, 105, 106, 111A, 112C, 117, 117A, 118, 122, 123, 126B, 128, 129B, 129C, 146, 152, 153, 154, 154A, 159, 160, 162, 165, 168, 169, 172, 172A to B, 175 to 180 and 183; Legislation - multiple Rating - multiple	Recommendation 4/2021: - The CKB should expand its "Responsibility Matrix" to include its obligations in terms of the: 2013 Regulations; 2018 Code of Conduct; and - WL4. - The "Responsibility Matrix" should also identify, per individual compliance obligation, appropriate policy and procedure document; and The ERA's document entitled: "Water Compliance Reporting Manual - Water Services Act 2012 – May 2020" may help the CKB to expand its "Responsibility Matrix".	CKB believes this is not a non-compliance however will review the matrix to assist with the operations and reporting.	Water Services	June 2022
5/2021	- Number: 102A; - Rating B2	Recommendation 5/2021: The CKB should comply with all the stipulations of clause 13(6) of the 2018 Code of Conduct, in	Completed in August 2021. Rates notice for FY 21/22 has been amended to include the 24 hours response number and the interpreter services information number and symbol.	Completed	Completed 2/8/2021

Reference (No/year)	Non Compliance/Controls (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditor's Recommendation	Corrective Action to be Taken	Responsible Unit(s)	Due Date
	13(6) 4.1.1 Each bill must contain the prescribed information.	respect of the of rate notices/tax invoices issued for sewerage charges. The following additional information should be disclosed on these tax invoices: - Clause 13(6)(e) - the telephone number of the 24- hour information line provided in accordance with clause 45 of the 2018 Code of Conduct; and - Clause 13(6)(g) - for a residential customer, the telephone number for interpreter services together with the National Interpreter Symbol and the words "Interpreter Services".			
6/2021	- Number: 114, 115, 116; - Rating B2 20(2)(3)(4) 4.1.1 The licensee must have a written procedure for the review of a bill on the customer's request.	Recommendation 6/2021: The CKB should: - Include the stipulations of clauses 20(2), (3) and (4) of the 2018 Code of Conduct in explicit detail in its Sewerage Services Charter; and - Ensure the Sewerage Services Charter is publicly available.	Customer Service Charter to be updated to reflect the recommendations	Water Services	June 2022
7/2021	- Number: 133A; - Rating D NR 32 4.1.1 The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances.	Recommendation 7/2021: The CKB's Sewerage Services Charter should provide for compliance with clauses 32(1)(b) and (c) of the 2018 Code of Conduct by stating the CKB must not charge interest or fees for late payment of a bill by a customer: If a complaint made by the customer to the CKB that directly relates to the non-payment of the bill is not resolved; or If a complaint made by the customer to the water services ombudsman (known to the City) that directly relates to the non-payment of the bill is not determined or is upheld by the water services ombudsman.	Customer Service Charter to be updated to reflect the recommendations	Water Services	June 2022
8/2021	- Number: 134A; - Rating D NR 33(1)(d)-(e) 4.1.1 The licensee must not commence or continue proceedings to recover a debt from a customer if a complaint made by the customer to the licensee or water services ombudsman, which directly relates to the water service charge to which the debt relates, is not resolved by the licensee (or is not determined or is upheld by the ombudsman).	Recommendation 8/2021: The CKB's Sewerage Services Charter should provide for compliance with clauses 33(1)(d) and (e) of the 2018 Code of Conduct by stating the CKB must not commence or continue proceedings to recover a debt from a customer if: A complaint made by the customer to the CKB that directly relates to the water service charge to which the debt relates is not resolved; or A complaint made by the customer to the water services ombudsman (known to the CKB) that directly relates to the water service charge to which the debt relates is not determined or is upheld by the water services ombudsman.	Customer Service Charter to be updated to reflect the recommendations	Water Services	June 2022
9/2021	Number: 146;	Recommendation 09/2021:	Complaints Handling Policy to be checked against the standard and the guidelines.	Water Services	

Reference (No/year)	Non Compliance/Controls (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditor's Recommendation	Corrective Action to be Taken	Responsible Unit(s)	Due Date
	Rating D 2 46(2) 4.1.1 The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's guidelines (if any).	The CKB should review its "Complaints Handling" policy using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's "Customer Complaints Guidelines: distinguishing customer queries from complaints".			June 2022
10/2021	Number: 152; 48(2) 4.1.1 The licensee must make available to each customer, at no charge, the customer's personal account information including information about bills previously issued to the customer and about the quantity of water supplied to, or wastewater discharged by, the customer in previous billing periods.	Recommendation 10/2021: The CKB must make historical financial information regarding sewerage services provided available at no charge.	Customer Service Charter to be updated to reflect the recommendations	Water Services	June 2022
11/2021	- Number: 165 - Rating D 2 Section 12, 4.8.1 The licensee must provide the ERA specified information relevant to the operation of the licence or the licensing scheme, or the performance of the ERA's function under the Act in the manner and form specified by the ERA.	Recommendation 11/2021: The CKB must on a timely basis provide the ERA with specified information relevant to the operation of WL4 version 7 or the licensing scheme, or the performance of the ERA's function under the Act in the manner and form specified by the ERA.	Noted. No further action.		

Asset Management Review

Reference (No/year)	Asset System Deficiency (Rating / Asset Management System Component & Effectiveness Criteria / Details of Asset System Deficiency)	Auditor's Recommendation	Corrective Action to be Taken	Responsible Unit(s)	Due Date
Previous Audit Recommendations					
2021 Audit					
R1/2021 to R4/2021	- Number: 6; Rating: C 1; Process: Asset Planning; Effectiveness criterion: Asset Management Plan covers key requirements; and Details: - Despite both being covered by WL4, until recently, the Kalgoorlie sewerage system (sewers, pumping stations and wastewater treatment plant (WWTP)) was operated by the CKB's Water Services group. However, the re-cycled water system was operated by CKB's Parks and Gardens department; - CKB has recently decided to amalgamate both systems under the management of the Water Services group - necessitating the transfer of Parks and Gardens staff associated with the re-cycled water system to the Water Services group; - Although CKB committed to create an updated AMP by March 2020, the document is not completed in a readily accessible format. A significant amount of documentation exists but is difficult to access - as it is located across three	Recommendation R1/2021: - All information relevant to the licensed water services should be consolidated in a single AMP, prepared in the form of four separate sections: i.e., section 1 - general information, section 2 - sewers and pumping stations, section 3 - WWTP and section 4 - re-cycled water system. Recommendation R2/2021: - The AMP was programmed for completion during March 2020, but significant input is required to consolidate the AMP as indicated above. In view of the workload of the small Water Services group tasked with operation and maintenance of the system, supervision of capital works and integration of Parks and Gardens staff, the Reviewer considers CKB should assign or appoint an experienced	No action required. A single AMP has been developed for both wastewater and recycled water services. The AMP was implemented in June 2020. No action required. A single AMP has been developed for both wastewater and recycled water services. The AMP was implemented in June 2020.		

Reference (No/year)	Asset System Deficiency (Rating / Asset Management System Component & Effectiveness Criteria / Details of Asset System Deficiency)	Auditor's Recommendation	Corrective Action to be Taken	Responsible Unit(s)	Due Date
	separate documents, each of which contain some information relevant to both systems. i.e., the Water Services Asset Management Plan (AMP), the Standard Operating Procedures (SOP) and the Water Quality Management Plan; and Reviewer considers that for clarity, a single AMP should be prepared for the water services - in the form of four separate sections i.e.: - Section 1 - General Information common to all water systems i.e., Background, Asset Creation and Acquisition, Asset Disposal, Environmental Analysis, Overall Risk Assessment, Asset Management Information System (MIS), overall Financial and Capital Expenditure Planning, and Review of the Asset Management System (AMIS); - Section 2 - sewers and pumping stations planning, operations, maintenance and capital expenditure planning; - Section 3 - WWTP - as recorded for section 2 above; and Section 4 - re-cycled water system - as recorded for section 2 above.	person to complete the AMP as a matter of urgency; and - The AMP contains some one hundred and twenty pages of Appendices containing specialist consultant's reports. These address demand forecast for sewerage, water balance of the WWTP, meter calibration, bore logs, recycled water issues and SCADA upgrades. The clarity of the AMP could be improved by removing and relocating these documents elsewhere. Their conclusions could be included in the AMP - with a cross reference to the reports and their location on the CKB's server. Recommendation R3/2021: - Clarity of the AMP should be improved by removing and relocating consultants and other reports elsewhere. Relevant summaries of their conclusions could be included in the AMP - with a cross reference to the reports and their location on CKB's server; and - The AMP basically addresses the sewerage system - but mainly, fails to address the recycled water system as a functioning facility of CKB's water licence. Recommendation R4/2021: - Planning, operation, maintenance, contingency and capital expenditure planning etc. for the re-cycled water system should be included in the AMP	No action required. CKB has included these documents in Appendices which are easily separated depending on what the AMP is being used for. The AMP is a live document that is reviewed at least annually. The documents in the Appendices are important documents relating to the current state of the Assets. No action required. CKB has included these documents in Appendices which are easily separated depending on what the AMP is being used for. The AMP is a live document that is reviewed at least annually. The documents in the Appendices are important documents relating to the current state of the Assets No action required. A single AMP has been developed for both wastewater and recycled water services. The AMP was implemented in June 2020. No action required. A single AMP has been developed for both wastewater and recycled water services. The AMP was implemented in June 2020.		
R5/2021	- Number: 6; - Rating: C 1; - Process: Asset Creation and Acquisition; - Effectiveness criterion: Full project evaluations are undertaken for new assets including comparative estimates of non-asset solutions; and Details: - Section 5.5 of the AMP sets out the principles of evaluation and procedures to be followed in the acquisition of assets. - Approval for acquisition is required from Council or Council approved budget proposals. Reference is made to CKB's standard procedures for purchasing, tender criteria and application of regional price preference; and - There appears to be no documented procedure for the evaluation of asset considered for acquisition, e.g., competing options available, initial and ongoing costs, reliability, local suppliers, availability of spares or replacement items etc.	Procedures should be prepared for assessing options for acquisition, replacement, or disposal including competing options available, initial and ongoing costs, reliability, local suppliers, availability of spares or replacement items.	The AMP does not contain procedures. Asset Lifecycle Management is included in the AMP in Section 5. Procedures will be developed and included in the Water Services Quality Management Plan that will align with the AMP section 5.	Water Services	June 2022
R6/2021	Number: 6;	That the AMP should contain a procedure for evaluating the various age, economic or	The AMP does not contain procedures. Asset Lifecycle Management is included in the AMP in Section 5. Procedures will	Water Services	June 2022

Reference (No/year)	Asset System Deficiency (Rating / Asset Management System Component & Effectiveness Criteria / Details of Asset System Deficiency)	Auditor's Recommendation	Corrective Action to be Taken	Responsible Unit(s)	Due Date
	- Rating: C 1; - Process: Asset Disposal; - Effectiveness criterion: There is a replacement strategy for assets; and - Details: The AMP does not contain a procedure for evaluating the various age, economic or performance related criteria leading to a decision to replace, refurbish, or dispose of assets.	performance related criteria leading to a decision to replace, refurbish, or dispose of assets.	be developed and included in the Water Services Quality Management Plan that will align with the AMP section 5.		
R7/2021	- Number: 6; - Rating: C 2; - Process: Asset Operations; - Effectiveness Criterion: Staff resources are adequate, and staff receive training commensurate with their responsibilities; and - Details: - Reviewer notes the management team is always extremely busy - possibly explaining the delay in completing the AMP in favour of implementing other operational procedures, including the complete data entry and implementation of RAMM; and - Reviewer was unable to access a training schedule for the water services team.	- CKB should consider the implications of the current workload of existing Water Services staff together with the future overall workload and staff numbers following the transfer of Parks and Gardens staff associated with the water re-cycling system; and - A training program should be prepared for the present/future staff.	Recruitment of staff is in progress and ongoing. A formal training programme for new and existing staff and contractors will be developed and implemented.	Water Services	June 2022
R8/2021	- Number: 6; - Rating: C 1; - Process: Asset Maintenance; - Effectiveness Criterion: Maintenance policies and procedures are documented and linked to service levels required; and - Details: Planned and un-planned maintenance are carried out by contractors for the sewer, pumping stations WWTP and the re-cycled water systems. Contract documents for mechanical, electrical, jetting works inspected by Reviewer included the maintenance schedules for each contract. Copies of the respective maintenance schedules should also be included in the AMP.	An inspection and maintenance schedule for the sewer, WWTP and re-cycling systems should be included in the AMP for each system; and Procedures for each of these inspections and their recording, follow up work etc. should be documented in the AMP for each system.	No action required. The inspection and maintenance schedules and procedures are included in the Water Services Quality Management Plan in Appendices P – Recycled Water AA - WWTP DD – Sewer Reticulation; Planning Assessments, Admin		
R9/2021	- Number: 6; - Rating: C 1; - Process: Asset Maintenance;	A procedure for each of these inspections and their recording, follow up work etc should be documented in the AMP, together with similar documentation for inspections, recording and un-planned	No action required.		

Reference (No/year)	Asset System Deficiency (Rating / Asset Management System Component & Effectiveness Criteria / Details of Asset System Deficiency)	Auditor's Recommendation	Corrective Action to be Taken	Responsible Unit(s)	Due Date
	- Effectiveness Criterion: Regular inspections are undertaken of asset performance and condition; and Details - Regular (monthly?) inspections of representative access chambers are undertaken in the sewer reticulation system and considered in conjunction with overflows/blockages in related pipework. If appropriate, detailed inspection of adjacent access chambers and sewers in the zone including CCTV inspection of related sewers is undertaken. If necessary, un-planned maintenance works are instigated by the relevant maintenance contractors. Procedures for these inspections are not documented.	maintenance for pumping stations, the WWTP and re-cycled water system.	The inspection and maintenance schedules are included in the Water Services Quality Management Plan in Appendices P – Recycled Water AA - WWTP DD – Sewer Reticulation; Planning Assessments, Admin		
R10/2021	- Number: 6; - Rating: C 3; - Process: Contingency Planning; - Effectiveness Criterion: Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks; and - Details: - Section 3 of the SOP contains detailed descriptions of the initial procedures to be followed in assessing the extent and consequence of emergencies in the sewer collection system, together with the level of CBK staff input including decision on mitigation and clean-up procedures. A broad variety of response options are provided for various scenarios including contact details of trade and equipment services contractors whose assistance may be required; - There are no contingency plans in the AMP for the WWTP or re-cycled water system. Reviewer briefly inspected related plans in the Water Quality Management Plan, which was initially prepared as part of the Memorandum of Understanding between DOH and CKB for the re-cycled water scheme; - Reviewer considers that contingency plans for sewers and pumping stations, together with copies from the WQMP of contingency plans for the WWTP and the re-cycled water system should all reside in the AMP - see Recommendation 1/2021; and - The AMP has no procedure for testing the contingency plans. Reviewer recognises that staff have a sound knowledge of the systems due to daily involvement in their operation and maintenance.	CKB should include contingency plans for sewers, pumping stations, WWTP and re-cycled water systems in their respective volumes of the AMP. The contingency procedure for sewers in the SOP should be transferred to the AMP for sewers; and CKB should conduct in-house workshops at which staff and selected maintenance contractors discuss and define the implications, reporting and actions required to manage and minimize the effects of selected asset malfunction or failure scenarios. The scenarios should be prepared by the Water Services Project Manager (or external facilitator) who should facilitate, rather than lead the discussions. Participants should be encouraged to consider implications such as cost, damage, time intervals, access, delays etc. Minutes of proceedings should be prepared and distributed to participants. Existing procedures should be amended if considered necessary. It is suggested that workshops be conducted twice yearly, each considering one major and one minor scenario.	Contingency planning is included in the AMP in section 5.7 Contingency Planning Contingency plan procedures to support the contingency plans included in the AMP are contained in the Water Services Quality Management Plan. A workshop schedule will be developed for asset and failure scenarios.	Water Services	June 2022
R11/2021	- Number: 6; - Rating: C 3; - Process: Review of the Asset management system; - Effectiveness Criterion: Independent reviews (e.g., internal audit) are performed of the asset management system; and - Details: - An internal review of the overall Asset Management System (AMS) has not been undertaken.	That CKB prepares procedures for and implements an annual review of the AMP and an audit of the performance of the AMS. Evidence of the reviews and any corresponding revisions should be noted on the front face sheet of the relevant section - and be signed off and dated by the reviewer.	No action required. The AMP defines "Plan Improvement and Monitoring in Section 7. Procedures are not required to audit the City's compliance with the AMP and the supporting procedures outlined in the Water Services Quality Management Plan		