

Recommendation Reference <sup>1</sup>	Non-compliance / Controls Improvement <sup>2</sup>	Auditor's Recommendation	Action Proposed to be taken by Licensee	Responsible person(s) <sup>3</sup>	Target Completion Date (Status 31/8/25)
1/2025	<p><b>Preserved Supply Register</b>  <b>Rating: C2</b> (Controls: Inadequate controls – _Significant improvement required/ Compliance: Non-compliant – _Minor impact)  <i>Obligation 154AA - The licensee must ensure that the specified information about Part 9 may be obtained from its website. (from July 2024)</i>  <b>Rating: C/NR</b> (Controls: Inadequate controls – _Significant improvement required/ Compliance: Not rated)  <i>Obligation 154CC - The licensee must, within 5 business days after recording a person on the register, provide the specified information in writing to the person. The licensee must, within 5 business days after recording a person on the register, provide the specified information in writing to the person.</i>  <i>Obligation 154C - The licensee must not, under section 95(1)(b) of the Act, reduce the rate of flow of a supply of water to a supply address recorded on the preserved supply register.</i>  <i>Obligation 154D - 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.</i></p> <p>The auditor sighted the Preserved Supply Register and confirmed that it included the prescribed information.</p>	<p>Information on how a customer can apply to be included on the Preserved Supply Register should be included on the website and have a link in the Establish an Account page.</p> <p>There should be a documented procedure for Preserved Supply including customer requests, not restricting supply and providing customer notifications and review every 3 years.</p>	<ul style="list-style-type: none"> <li>• Add information to the LSW web site regarding Part 9 of the Water Services Code of Conduct (Customer Service Standards) 2024 (Requirements for supply of water to persons with special requirements of needs).</li> <li>• Link this information to the 'Establish an Account' page.</li> <li>• Prepare a procedure for "Preserved Supply" including managing customer requests, not restricting flow, provision of information, and emergency contacts.</li> <li>• Procedure to be reviewed regularly (at least every 3 years)</li> </ul>	<p>BS, AR</p> <p>BS</p>	<p>29/8/25 <i>Complete</i></p> <p>29/8/25 <i>Complete</i></p>

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	<p>There were no customers recorded for Lancelin South Water.</p> <p>Part 9 of the Code of Conduct specifies the requirements for supply of water to persons with special requirements or needs. The GM, LSW confirmed there have been no requests from customers re preserved supply.</p> <p>However, there is no information on the website about how to apply to be included on the Preserved Supply Register.</p> <p>There is no procedure for requests from customers to be included on the Preserved Supply Register.</p> <p>There is no procedure for not restricting the rate of water flow for any customers included on the Preserved Supply Register.</p> <p>There is no procedure for giving notice re restricting the rate of water flow for any customers included on the Preserved Supply Register</p>		<ul style="list-style-type: none"> <li>Prepare a procedure regarding restricting flow to customers</li> </ul>	BS	<p>29/8/25</p> <p><i>Complete</i></p>
2/2025	<p><b>Asset Maintenance</b></p> <p><i>Risk management is applied to prioritise maintenance tasks.</i></p> <p><b>Rating: B3</b> (corrective action required with processes that require some improvement).</p> <p>The Maintenance Policy document states a risk assessment of the water system assets will be undertaken and annually reviewed, to focus maintenance strategies on assets at highest risk of failure. The asset risk assessment was last updated in March 2023, and prior to that in 2021 and 2019.</p> <p><b>Risk Management</b></p>	<p>The asset risk assessment should be reviewed as soon as possible and then at least every 2 years or if major changes occur in the assets or services.</p> <p>The Maintenance Policy should be updated for this requirement.</p>	<ul style="list-style-type: none"> <li>Update risk assessment</li> <li>Update Maintenance Policy to reflect requirement to review the risk assessment every 2 years (rather than annually)</li> </ul>	<p>BS</p> <p>BS</p>	<p>15/8/25</p> <p><i>Complete</i></p> <p>15/8/25</p> <p><i>Complete</i></p>

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	<p><i>Probability and consequences of asset failure are regularly assessed.</i></p> <p>Section 3.3 Risk of the AMP (3.3.1 Risk Identification) defines the likelihood and consequence criteria and the risk matrix used. Critical assets are also defined. Existing controls for a number of the risks are operating activities – typically monitoring and inspection tasks. The risk assessment is completed in a spreadsheet. This was provided and included the most recent update in March 2023.</p> <p>The risk assessment is planned to be updated at least every 2 years.</p>				
Suggested Improvement	<p><b>Domestic Violence Policy</b></p> <p>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.</p>	<p>Lancelin South's Domestic Violence Policy is available on the website and the GM, LSW confirmed that a hardcopy is available to a customer upon request and at no charge.</p> <p>The audit noted that the Family Domestic Violence Policy on the website is the 2021 version. There have been minor updates to the footer and web links.</p> <p><i>An improvement is that the website should be updated for the 2023 version of the Family Domestic Violence Policy.</i></p>	<ul style="list-style-type: none"> <li>Update link from the LSW web site 'Home Page' to the current (2023) version of the LSW "Family Domestic Violence Policy"</li> </ul>	BS, AR	<p>29/8/25</p> <p><i>Complete</i></p>

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Suggested Improvement	<b>Ongoing legal/environmental /safety obligations of the asset owner</b> The AMP references the ERA water services licence, DWER groundwater licence, Australian Drinking Water Guidelines (2011), Department of Health MoU and Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (2006) for the requirements for collection, treatment and disposal of sewerage. Section 2.3 of the AMP also lists legislative requirements relevant to Lancelin South Water operations. A range of obligations related to these requirements are included in section 2.4 (Levels of Service) and assigned as performance indicators. Job safety is referred to in section 3.3.4 of the AMP (within the section on Risk). Safety documents referenced as part of the AMP include Emergency Response Plan, Health and Safety Guideline, WTP Hazardous Substances Risk Assessment and Material Safety Data Sheets.	The AMP references the ERA water services licence, DWER groundwater licence, Australian Drinking Water Guidelines (2011), Department of Health MoU and Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (2006) for the requirements for collection, treatment and disposal of sewerage. Section 2.3 of the AMP also lists legislative requirements relevant to Lancelin South Water operations. A range of obligations related to these requirements are included in section 2.4 (Levels of Service) and assigned as performance indicators. Job safety is referred to in section 3.3.4 of the AMP (within the section on Risk). Safety documents referenced as part of the AMP include Emergency Response Plan, Health and Safety Guideline, WTP Hazardous Substances Risk Assessment and Material Safety Data Sheets. <i>An improvement is that in section 2.3 of the AMP - it should be clarified in an update to the AMP that as of January 2022 the relevant version of the ADWG is ADWG 2011 v3.7 (January 2022) and the relevant version of the Government Sewerage Policy is 2019. It should be confirmed that the location of the Lancelin South Water Reserve is incorporated into the Shire of Gingin's Local Planning Scheme (listed as recommendation 2 in the Lancelin South Water Reserve Drinking Water Source Protection Plan). A plan could not be located showing the location of the water reserve. The Drinking Water Source Protection</i>	<ul style="list-style-type: none"> <li>Update AMP to reflect current revisions of ADWG and Government Sewerage Policy.</li> </ul>	BS	29/8/25 <i>Complete</i>
			<ul style="list-style-type: none"> <li>Confirm that the location of the LS water Reserve is incorporated into the Shire of Gingin's Local Planning Scheme</li> </ul>	BS	29/8/25 <i>In progress – expect complete 26/9/25</i>

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		<i>Plan (2020) linked to the Lancelin South Water website does not include a site plan.</i>			
Suggested Improvement	<b>Operational Costs</b> Operational costs are measured and monitored.	The AMP only provides an operating expense forecast as part of the 10 year financial plan. There is no breakdown or discussion of monitoring actual operating cost. <i>An improvement is to include in the AMP a description of how the actual operating costs are monitored against budget.</i>	<ul style="list-style-type: none"> <li>Update AMP to include a description of how actual costs are monitored against budget</li> </ul>	BS	29/8/25  <i>In progress – expect complete 26/9/25</i>
Suggested Improvement	<b>Asset Maintenance</b> Maintenance policies and procedures are documented and linked to service levels required.	The maintenance schedule appears to be a more detailed schedule of maintenance requirements and frequency (than included in the maintenance procedure) but is not yet complete. <i>A minor update is required to reflect Pentium Water is now undertaking the role Urbaqua previously provided.</i>	<ul style="list-style-type: none"> <li>Update Maintenance Schedule to reflect service provision by Pentium Water</li> </ul>	BS	<i>Complete</i>

1. Reference number / year / Compliance Rating
2. Rating / Licence obligation number & Licence Obligation / Details of non-compliance or inadequacy of controls
3. BS = Blair Shackleton, General Manager Lancelin South Water; AR = Arthur Raykos, Director InDepth Design (web master)