

Shire of Brookton
POST AUDIT & POST REVIEW IMPLEMENTATION PLAN 2015

REVIEW ITEM REF No Year	NON COMPLIANCE CONTROLS	AUDITORS RECOMMENDATION	POST REVIEW IMPLEMENTATION PLAN ACTION	SHIRE OFFICER RESPONSIBLE	DATE OF IMPLEMENTATION
A1-2015	<p><i>Non-compliant - B2</i></p> <p><i>Water Services Licensing Act 1995, Clause 20.1</i></p> <p><i>Inadequate reporting performance standard procedure/ control</i></p>	<p>We recommend that the licensee prepare a compliance register and reporting procedure based on the Authority's Compliance Report Manual to assist in keeping track of its statutory and regulatory obligations. The observations detailed in table 5-1 in this audit report may be used as the basis for this. With appropriate correspondence retained and logged in a suitable named and located folder on the licensee's server.</p> <p>Note: reporting procedure to detail how the data is collected, validated, reviewed/analysed and reported to the ERA including aspects such as a procedure for calculating length of sewer pipe, validating the number of customers for performance reporting purposes.</p>	<p>The Shire of Brookton has developed a Recycled Water Quality Management Plan & Operations Manual which outlines Data Collection procedures in section 7. along with Reporting Dates and procedures as per our Licence conditions in section 11</p> <p>There is a compliance register in the front of the relevant ADM Files for all correspondence and also Licence Compliance Reporting Information.</p> <p>The length of our sewer pipe is calculated using the As Constructed Drawings as this is the most accurate way of measuring these.</p> <p>Validating the number of customers with connections is produced by our Rates Officer as this information is pulled directly off our rated properties. This procedure is also included in our RWQMP Section 11</p>	WATO – Melissa Pollock	March 2015

Post Audit Post Review Implementation Plan April 2015

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A2-2015	<p><i>Non-compliant – B2</i></p> <p><i>Water Services Licensing Act 1995, Licence Number 12, version OL2, Schedule 3 Clause 2.5</i></p> <p><i>Customer Service Charter not available to its customers in the three ways.</i></p>	No further recommendation as this obligation is no longer in effect.	No Further Action Required		
A3-2015	<p><i>Non-compliant – B2</i></p> <p><i>Water Services Licensing Act 1995, Licence Number 12, version OL2, Schedule 3 Clause 2.6 or 2.7</i></p> <p><i>Review of Customer Service Charter not undertaken at least once in every three year period.</i></p>	No further recommendation as this obligation is no longer in effect.	No Further Action Required		
A4-2015	<p><i>Non-compliant –B2</i></p> <p><i>Water Services Licensing Act 1995, Clause 8</i></p> <p><i>Licensee has not provided one of the other two consultation mechanisms identified in clause 4.1(b)</i></p>	No further recommendation as this obligation is no longer in effect.	No Further Action Required		

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A5-2015	<p><i>Non-compliant – B2 Water Services Licensing Act 1995, Schedule 3 Clause 4.1</i></p> <p><i>Licensee had not established a Customer Council or institute at least 2 of the following: establish a regular meeting; publish a newsletter or run other public forums, concerning the licensed activities.</i></p>	No further recommendation as this obligation is no longer in effect.	No Further Action Required		
A6-2015	<p><i>Non-compliant – B2 Water Services Licensing Act 1995, Clause 5.1</i></p> <p><i>Licensee has not complied with all applicable legislation.</i></p>	Refer to recommendation A1-2015	Refer A1-2015		
A7-2015	<p><i>Non-compliant – B2 Water Services Act 2012, Clause 5.3</i></p> <p><i>Licensee has not complied with all of the obligations of the Water Services Code of Conduct (Customer Service Standards) 2013</i></p>	We recommend that the licensee address the recommendations A11-2015 to A21-2015	Refer planned action in A11-2015 – A21-2015		

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A8-2015	<p><i>Non-compliant – B2</i> <i>Water Services Act 2012, Clause 5.4</i></p> <p><i>The licensee has not fully complied with a direction from the Authority in relation to a breach of applicable legislation, notably addressing all of the deficiencies identified in the Authority's Section 39(1) notice</i></p>	Implement the remaining Section 39(1) Notice recommendations identified in Table 3-1 of this document.	<p>Refer A1-2015 <i>This review item is covered in A1-2015 where it refers to the compliance register.</i></p>		
A9-2015	<p><i>Non-compliance – B2</i> <i>Water Services Act 2012, Sections 82(4) & (5)</i></p> <p><i>The licensee to provide required notification of and requirements as to building work within 7 days of receiving the fee for dealing with the notification.</i></p>	Licensee to amend its current approval approach to accommodate the response times of both the Building Act 2011 (Regulation 20, Clause 10 of the Building Act 2011) and the Water Service Act 2012.	<p>The Shire of Brookton will ensure that it meets the 7 day notification after receiving the fee but please note that this clause is out of date and needs to be reviewed.</p>	EHO – Tim Jurmann	Immediately
A10-2015	<p><i>Non-compliance – B2</i> <i>Water Services Act 2012, Clause 5.3</i></p> <p><i>Licensee has not complied with all of the obligations of the Water Services Code of Conduct (Customer Service Standards) 2013</i></p>	Refer to recommendation A7-2015	<p>Refer A7-2015</p>		

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A11-2015	<p><i>Non-compliance – B2</i></p> <p><i>Water Services Code of Conduct (Customer Service Standards) 2013, Clause 7</i></p> <p><i>Licensee must have written information for customers about the specified matters under section 21(2)(c) or (3)(c) and section 73 of the Act.</i></p>	Amend the latest version of the Customer Service Charter to reflect the required information about connections as required under section 21(2)(c) or (3)(c) and section 73 of the Act. (obligation 93 of the 2014 compliance manual).	<p>This is now reflected in the Shire of Brookton’s RWQMP, Customer Services Charter.</p> <p><i>The revised and updated Customer Services Charter has now been loaded onto the Shires website</i></p>	WATO – Works Administration Technical Officer	March 2015
A12-2015	<p>Non-compliance – C2</p> <p>Water Services Code of Conduct (Customer Service Standards) 2013, Clause 18(2)</p> <p>License does not have a formal written procedure for the review of a bill on the customer’s request.</p>	Prepare a written procedure for review of a bill consistent with the requirements of the Code, compliance manual 2014 obligations 114 to 116	A Bill reviewed procedure is now included in our Customer Services Charter 2015 Version, which is found on the Shire Website & available at our Customer Service Centre.	WATO – Works Administration Technical Officer	March 2015
A13-2015	<p><i>Non-compliance – C2</i></p> <p><i>Water Services Code of Conduct (Customer Service Standards) 2013, Clauses 18(3) & (6)</i></p> <p><i>License does not have a formal written procedure for the review of a bill on the customer’s request.</i></p>	Refer to recommendation A12-2015	A Bill reviewed procedure is now included in our Customer Services Charter 2015 Version, which is found on the Shire Website & available at our Customer Service Centre.	WATO – Works Administration Technical Officer	March 2015

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A14-2015	<p><i>Non-compliance – C2</i> <i>Water Services Code of Conduct (Customer Service Standards) 2013, Clause 18(4)</i></p> <p><i>License does not have a formal written procedure for the review of a bill on the customer's request.</i></p>	Refer to recommendation A12-2015	A Bill reviewed procedure is now included in our Customer Services Charter 2015 Version, which is found on the Shire Website & available at our Customer Service Centre.	WATO – Works Administration Technical Officer	March 2015
A15-2015	<p><i>Non-compliance – B2</i> <i>Water Services Code of Conduct (Customer Service Standards) 2013, Clause 21(1)</i></p> <p><i>The licensee does not have direct debit payment method to allow a customer to pay a bill.</i></p>	In addition to the other bill payment options, the licensee to make provision of direct debit services available as identified in Section 7 of its Financial Hardship Policy and as consistent with the Authority's Financial Hardship Policy Guidelines. Make the direct debit consent forms available on the licensee's website	<p>There was a wording error made when Council adopted the policy in March 2014. Direct Debit is not available and as per new Bank requirements the Shire is no longer able to accept over the phone payments for security reasons.</p> <p><i>Direct Debit payment method is not available due to small number of instances where this method is required therefore the cost of a new software module to cater for this method is not cost effective.</i></p> <p><i>Phone payment method was removed on advice from our Bank when credit card signature authorization was replaced with PIN number only.</i></p> <p><i>The Shire therefore does not propose to implement Direct Debit or Phone payment methods.</i></p>	WATO – Works Administration Technical Officer	Policy to be amended in the June 2015 Council Meeting

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A16-2015	<p><i>Non-compliance – B2 Water Services Code of Conduct (Customer Service Standards) 2013, Clause 26(3)</i></p> <p><i>Licensee did not have the financial hardship policy in place by required timeframes.</i></p>	<p>No recommendation required as Financial Hardship Policy is now in place</p>	<p>No Further Action Required</p>		
A17-2015	<p><i>Non-compliance – B2 Water Services Code of Conduct (Customer Service Standards) 2013, Clause 35(2)</i></p> <p><i>Licensee's complaints procedure not developed using provisions of the AS ISO 10002</i></p>	<p>Amend the current complaints procedure to reflect the relevant provision of AS ISO 10002</p>	<p>The complaints handling policy was adopted by council in March 2014 and complies with clause 35 (2) of the water services code of conduct which we could not locate at the time of the audit.</p> <p>Complaints Handling Procedures are also located in our Customer Services Charter, in our RWQMP and are available on our website or at our customer services centre.</p> <p>These documents meet all parts of Clause 35. Of the Water Services Code of Conduct Customer Services Standards 2013</p>		<p>MARCH 2015</p>

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A18-2015	<p><i>Non-compliance – B2 Water Services Code of Conduct (Customer Service Standards) 2013, Clause 35(3)</i></p> <p><i>Licensee's complaints procedure does not fully address the matters specified in relation to lodgement of complaints, responding to complaints, dispute resolution arrangements and resolving complaints.</i></p>	Amend the current complaints procedure to better align with the matters identified in clause 35(3) of the Water Code.	<p>The complaints handling policy was adopted by council in March 2014 and complies with clause 35 (2) of the water services code of conduct which we could not locate at the time of the audit.</p> <p>Complaints Handling Procedures are also located in our Customer Services Charter, in our RWQMP and are available on our website or at our customer services centre.</p> <p>These documents meet all parts of Clause 35. Of the Water Services Code of Conduct Customer Services Standards 2013</p>		MARCH 2015

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A19-2015	<p><i>Non-compliance – B2 Water Services Code of Conduct (Customer Service Standards) 2013, Clause 35(4)</i></p> <p><i>Licensee’s complaints procedure does not set out the costs and benefits to the customer if the use the complaint resolution procedure or instead of the procedures under the Act.</i></p>	<p>Amend the current procedure to better align with the matters identified in clause 35(4) of the Water Code.</p>	<p>The complaints handling policy was adopted by council in March 2014 and complies with clause 35 (2) of the water services code of conduct which we could not locate at the time of the audit.</p> <p>Complaints Handling Procedures are also located in our Customer Services Charter, in our RWQMP and are available on our website or at our customer services centre.</p> <p>These documents meet all parts of Clause 35. Of the Water Services Code of Conduct Customer Services Standards 2013.</p> <p><i>The benefits to the customer of using the Shires complaints procedure will be included in the next review of the Customer Service Charter</i></p>		<p>MARCH 2015</p> <p>July 2015</p>

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A20-2015	<p><i>Non-compliant – B2</i></p> <p><i>Water Services Code of Conduct (Customer Service Standards) 2013, Clause 35(6)</i></p> <p>The licensee's complaints procedure must be publicly available.</p>	<p>Licensee to publish policy 2.22 (Complaints Handling) in the Shire's Policy Manual</p>	<p>The complaints handling policy was adopted by council in March 2014 and complies with clause 35 (2) of the water services code of conduct which we could not locate at the time of the audit.</p> <p>Complaints Handling Procedures are also located in our Customer Services Charter, in our RWQMP and are available on our website or at our customer services centre.</p> <p>These documents meet all parts of Clause 35. Of the Water Services Code of Conduct Customer Services Standards 2013</p>		MARCH 2015
A21-2015	<p><i>Non-compliance – B2</i></p> <p><i>Water Services Code of Conduct (Customer Service Standards) 2013, Clause 37(1)</i></p> <p><i>The licensee does not make all of the prescribed information publicly available</i></p>	<p>Provide more information on bill payment methods available on the Shire's website.</p> <p>Provide more information in the Customer Service Charter and Financial Hardship Policy for :</p> <ul style="list-style-type: none"> • addressing the matters detailing exemptions, rebated, discounts are on the customer's bill, and • information on the services provided under Clause 36 of the Code. 	<p>Bill payment options are stated on the Rates Notice. Pensioner Rebate information is on the back of the rates notice. Payment information has been updated in the Customer Services Charter. Payment information in the Financial Hardship Policy will be amended in the June Council Meeting.</p> <p><i>The required information on Bill payment methods, exemptions, discounts and rebates will be included in the next review of the Customer Service Charter and Financial Hardship</i></p>	<p>WATO – Works Administration Technical Officer</p> <p>CEO – Kevin O'Connor</p>	<p>March 2015</p> <p>June 2015</p>

			<i>Policy.</i>		
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A22-2015	<p><i>Non-compliant - B2</i></p> <p><i>Water Services Act 2012, Section 12 (Clause 16)</i></p> <p><i>Responses to the Authority have not been in the time specified by the Authority over the audit period.</i></p>	Refer to recommendation A1-2015	Refer A1-2015		
A23-2015	<p><i>Non-compliant - B2</i></p> <p><i>Water Services Act 2012, Section 12 (Clause 16)</i></p> <p><i>The licensee did not provide a compliance report to the Authority for 2011/12 reporting period on time.</i></p>	Refer to recommendation A1-2015	Refer A1-2015		
A24-2015	<p><i>Non-compliant - B2</i></p> <p><i>Water Services Act 2012, Section 12 (Clause 20)</i></p> <p><i>The licensee notification to the Authority of a material change to the asset management system was longer than the prescribed 10 days following the post implementation review.</i></p>	Refer to recommendation A1-2015	Refer A1-2015		

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25-2015	<p><i>Non-compliant – B2</i></p> <p><i>Water Services Act 2012, Section 29 (Clause26)</i></p> <p><i>The licensee has not complied with all the duties imposed on it by the Act as it not fully addressed all asset management deficiencies under section 39(1) notice issued by the Authority and was unable to meet all Code requirements.</i></p>	Refer to recommendation A8-2015 and A7-2015	Refer A7-2015 & A8-2015		
A26-2015	<p><i>Non-compliant - B2</i></p> <p><i>Water Services Act 2012, Section 12 (Clause 30)</i></p> <p><i>Late approval of the Financial Hardship Policy does not comply with the Authority's guideline timeframes.</i></p>	Refer to recommendation A1-2015	Refer A1-2015		
R1-2015	<p><i>B2</i></p> <p><i>Asset planning - Asset management plan covers key requirements</i></p> <p><i>Process and policy documentation requires improvement</i></p>	Although the AMP covers the licensee's sewerage scheme, we recommend that either additional section be added to the document to relate to the non-potable water assets and associated operations and maintenance requirements. We suggest this is informed by DWA's 2013 report titled Brookton Water Reuse System Review and Improvement Recommendations	<p>Is this a requirement of our asset management system? All non-potable water assets are already included in the AMP. The operations and maintenance requirements of the non-potable water scheme are now included in our Recycled Water Quality Management Plan & Operations Manual.</p> <p><i>The RWQMP was sent to the Health Department on 30th March 2015 for their review and subsequent approval.</i></p>	WATO – Melissa Pollock	<p>July 2015</p> <p>September 2015</p>

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R2-2015	<p><i>B2</i></p> <p><i>Asset planning - Asset management plan covers key requirements</i></p> <p><i>Process and policy documentation requires improvement</i></p>	<p>Revise the Risk Management Section of the AMP (including risk assessment) to better align with Shire's the corporate risk management framework and thus better reflect the requirements of ISO 31000.</p>	<p>This document has been completed by our DCEO – Evelyn Arnold and Consultant Matt Ryding to update in the AMP</p>	<p>WATO – Melissa Pollock & Matt Ryding – DWA - Consultant</p>	<p>MAY 2015</p>
R3-2015	<p><i>B2</i></p> <p><i>Environmental analysis - Opportunities and threats in the system environment are assessed</i></p> <p><i>Process and policy documentation requires improvement</i></p>	<p>We recommend that the AMP be updated to reflect the new legislative framework and that the number and date of the ERA licence be corrected to indicate the current licence.</p>	<p>Update AMP</p>	<p>Matt Ryding DWA - Consultant</p>	<p>MAY 2015</p>
R4-2015	<p><i>B2</i></p> <p><i>Environmental analysis - Opportunities and threats in the system environment are assessed</i></p> <p><i>Process and policy documentation requires improvement</i></p>	<p>Refer to recommendation A1-2015</p>	<p>Refer A1-2015</p>		

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R5-2015	<i>B2 Asset operations - Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data Processes and policies do not adequately document the required performance of the assets.</i>	We recommend that a column be provided in the asset registers to accommodate asset condition rating scoring (1-5) consistent with Form ASSET 02.	AMP to be updated with fixed asset register list numbers	Matt Ryding – DWA Consultant	MAY 2015
R6-2015	<i>B2 Asset operations - Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data Process and policy documentation requires improvement.</i>	We recommend that the operational and financial asset registers be aligned using a unique asset identification number, alternatively a table inserted into the AMP clearly detailing the corresponding reference identification numbers between the two registers.	Asset documentation is now recorded in the Brookton Sewerage System – Asset Condition Maintenance Assessment Spreadsheets to reflect this AMP to reflect Shires Asset Register by assigning identification Numbers	DWS – Matt Ryding DCEO - Evelyn Arnold	June 2015
R7-2015	<i>B2 Asset operations - Operational policies and procedures are documented and linked to service levels required. Processes and policies do not adequately document the required performance of the assets.</i>	We recommend that sampling procedures for the scheme be detailed in the Operations Manual.	A procedure for this is included in our RWQMP	WATO – Melissa Pollock	February 2015

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R9-2015	<p><i>B2 Risk management - Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system</i></p> <p><i>Risk assessment needs to be updated to reflect corporate risk management framework to better reflect the requirements of ISO 31000.</i></p>	Refer to recommendation R2-2015	Refer R2-2015		
R10-2015	<p><i>B2 Financial planning - The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)</i></p> <p><i>Approach to integrated budget planning not detailed.</i></p>	As previously noted, the licensee advised that it is currently refining this approach to integrated budgeting process to be informed better by the licensee's AMPs as part of the next revision of the 5 year capital expenditure plan for 2016 to 2021. A copy of the process to be included in the AMP. Finalised budgets are to be reflected back into respective AMPs with details of works not proceeding and why.	When R5-2015 & R6-2015 have been completed this will allow correct information for R10-2015 to be completed	DCEO Evelyn Arnold Consultant – Matt Ryding - DWP	JUNE 2015

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R11-2015	<p><i>B3 Asset maintenance – Regular inspections are undertaken of asset performance and condition</i></p> <p><i>Improvement opportunity to enhance operation efficiency through assessment of WWTP and scheme performance</i></p>	<p>We recommend that as good operational practice an analysis of available flow data and water quality characteristics data be undertaken to determine the efficiency of the treatment plant including accounting for evaporative losses.</p> <p>A representative sample of WWTP inflow BOD and SS be undertaken over a representative short-term period as a reference point in time. Analysis to be documented in the AMP.</p> <p>The analysis to also include the strength of the inflow compared with that expected from a septic tank in order to assess whether or not septic tanks connected to the system were (as a whole) operating effectively. This should eventually form part of the Department of Health’s Recycled Water Quality Management Plan.</p>	<p>This analysis is undertaken on the outflow of the treated water which is used for the reuse scheme.</p> <p>Flow volumes are also measured on the outflow of the treated water. This is documented in the Asset Condition Maintenance Assessment Spreadsheets which is also included in the amp</p> <p>We believe this will be a limited benefit as the waste water has minimal environmental impact as after being treated the water is used in a reuse scheme and the effluent is not discharged into the waste water lagoon or environment.</p> <p>We believe this is a limited benefit that will not provide any worthwhile performance measures</p>		

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R12-2015	<p>B3</p> <p><i>Asset creation/acquisition – Commissioning tests are documented and completed</i></p> <p><i>Recent works on the pump station have not been thoroughly commissioned</i></p>	Complete commissioning exercise and documentation for the recent pump station works and retain records in AMIS.	Remote Alarm System in place & working effectively and is recorded in the Facility Repair Register in the Shires Asset Condition Maintenance Assessment 2014	<p>PWS – Geoff Forward</p> <p>WATO – Melissa Pollock</p>	FEBRUARY 2015
R13-2015	<p>A2</p> <p><i>Asset creation/acquisition - Full project evaluations are undertaken for new assets</i></p> <p><i>Use of Form Asset 03 not yet implemented</i></p>	Implement the use of Asset Planning & Acquisition Form (Form Asset 03) when appropriate project need arises.	This has now been implemented	WATO – Melissa Pollock	FEBRUARY 2015