

PAXON

BUSSELTON WATER CORPORATION

2022 OPERATIONAL AND ASSET MANAGEMENT
REVIEW

FINAL

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EXECUTIVE SUMMARY

Background

Busselton Water Corporation (BWC) is a water corporation that supplies drinking water to more than 26,000 people across the Busselton area of Western Australia. BWC has a Water Services Licence as issued by the Economic Regulation Authority (ERA) under the *Water Services Act 2012 (Act)*.

Paxon has been engaged by the Economic Regulation Authority (ERA) to audit and review BWC Operating Licence.

The audit and review cover the period from 1 April 2019 to 31 March 2022 (“audit period”).

The audit and review assessment is based on the compliance obligations as set out as per the following:

- Licence – WL003;
- Associated and applicable legislation;
- Regulatory Guidelines – Water Compliance Reporting Manual 2021 (and versions May 20 and May 18); and
- ERA 2019 Audit and Review Guidelines: Water Licences.

Operational Audit

Through the execution of the approved Audit Plan, Paxon has gained reasonable assurance that BWC has fully complied with its Water Services Licence obligations during the audit period.

Out of 211 application compliance obligations, the audit and review found:

- 153 obligations were rated compliant and 1 rated non-compliant (moderate impact).
- 57 were not rated for compliance, as no relevant activity took place during the audit period (45 with adequate controls and 12 where controls were not reviewed).

The audit confirmed that BWC has complied with its information reporting obligations for the audit period.

The control environment has been reviewed to be effective to meet compliance with the conditions of the ERA Licence.

Asset Management Review

Through the execution of the approved Audit Plan, Paxon determines that BWC operates its potable water supply services with professional efficiency. Its management and staff are a dedicated, competent team. BWC’s documentation of its policies, procedures and management of its assets are excellent. Overall, BWC operates an effective asset management system.

BWC is consistently achieving the service and quality standards of its customer commitments and the requirements of the various licences and agreements related to the services provided under its water services licence.

This review awarded the highest “A1” rating to fifty-six of the fifty-eight sub-processes associated with the twelve key processes reviewed.

Basis for Assigning Ratings for this (2022) Review

Tables 9 and 10 of the ERA’s: “2019 Audit and Review Guidelines - Water Licences – August 2022” provided the basis for the ratings allocated during the Review to:

- Asset Management;
- Policy; and
- Asset Management Performance.

Paxon’s rating of the twelve key processes (based on the above tables) of the effectiveness of BWC’s asset management system is summarised in the below table titled: “Summary of Review Ratings”.

Asset Management System	Process and Policy Rating				Performance Rating			
	Adequately Defined	Requires Some Improvement	Requires Substantial Improvement	Inadequate	Performing Effectively	Improvement Required	Corrective Action Required	Serious Action Required
Process	A	B	C	D	1	2	3	4
Asset Planning	√				√			
Asset Creation and Acquisition		√				√		
Asset Disposal	√				√			
Environmental Analysis	√				√			
Asset Operations	√				√			
Asset Maintenance	√				√			
Asset Management Information System	√				√			
Risk Management	√				√			
Contingency Planning	√					√		
Financial Planning	√				√			
Capital Expenditure Planning	√				√			
Review of Asset Management System	√				√			

Summary of Review Ratings

1. INDEPENDENT AUDITOR'S REPORT

Busselton Water Corporation has a Water Services Licence issued by the ERA under the auspice of the *Water Services Act 2012* to supply water to the Busselton and surrounding areas. BWC is required to comply under the specific conditions of the issued licence. During the review period, there were the following versions of the Water Licence WL003 in operation:

- Water Services Licence – Busselton Water Corporation – WL003, Version 8, 1 July 2016;
- Water Services Licence – Busselton Water Corporation – WL003, Version 9, 1 May 2020;
- Water Services Licence – Busselton Water Corporation – WL003, Version 10, 2 June 2021

Paxon has performed reasonable assurance engagement on BWC compliance as per the conditions set out within the issued licences over the review period (1 April 2019 to 31 March 2022).

Our assessment was made against the licence obligations listed in the Water Compliance Reporting Manual 2021 and previous versions May 2018 and May 2020 and in accordance with the ERA's 2019 Audit and Review Guidelines: Water Licences. The scope of our review relates to assessing BWC systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations required by the Licence issued under the Act.

Our opinion is based on the audit and review activities that were performed as per the approved Audit Plan by the ERA. This included collating, reviewing and retaining all evidence to determine that BWC has complied in all necessary aspects of the licence conditions and the respective legislative obligations during the review period.

Our engagement has been conducted on a risk assessment approach as per the Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements.

Summary of Procedures

Our procedures for this Review is as per the approved Audit and Review Plan as approved by the ERA, this in combination of the ERA's 2019 Audit and Review Guidelines: Water Licences. During our field work we interviewed relevant BWC'S staff who were involved in both the operational and asset maintenance. This allowed us to have an understanding of the control environment, processes and obligations as per BWC licence.

We reviewed the various plant and facilities with senior engineer and other staff. We also reviewed the various information that BWC provided, both electronic and in hard form to perform risk based testing that is aligned with the approved Audit and Review Plan.

Reasonable Assurance and Material Non-Compliance

Reasonable assurance is a high level of assurance but is not a guarantee that it will always detect a material non-compliance with the compliance requirements.

Instances of non-compliance are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken on the basis of the Licensee's compliance with the compliance requirements.

Inherent Limitations

Due to the inherent limitations in any internal control structure, it is possible errors, fraud or irregularities may occur and not be detected. Further, the internal control structure, within which the control procedures that have been reviewed operate, has not been reviewed in its entirety and therefore no opinion is expressed as to the effectiveness of the greater internal control structure.

A reasonable assurance engagement for the review period does not provide assurance for the Licensee that the compliance requirements will continue in the future.

Management's responsibility

BWC's management are responsible for:

- The compliance activities undertaken to meet the requirements of the Licence;
- Identifying risks that threaten the compliance requirements identified above being met and identifying, designing and implementing controls to enable the compliance requirements to be met and, monitoring ongoing compliance;
- Ensuring that it has complied in all material respects with the requirements of the Licence;
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements;
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the ERA; and
- Implementing corrective actions for instances of non-compliance (if any).

Our responsibility

Our responsibility is to perform a reasonable assurance engagement in relation to ERA's compliance with its Licence requirements throughout the period and to issue an assurance report that includes our conclusion.

Our Independence and Quality Control

We have complied with our independence and other relevant ethical requirements of the Code of Ethics for Professional Accountants issued by the Australian Professional and Ethical Standards Board and complied with the applicable requirements of Australian Standard on Quality Control 1 to maintain a comprehensive system of quality control.

We confirm that to the best of our ability and knowledge, this audit and review report is an accurate presentation of our findings and opinions.

Paxon Group

Cameron Palassis
Executive Director

2. OPERATIONAL AUDIT

2.1 Objective and Scope

The objective of the 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 Licence.

The Audit will be a reasonable assurance engagement.

The Audit will focus on the effectiveness of systems and processes used to ensure compliance with the standards, outputs and outcomes required by the Licence. The Audit Report will identify areas where improvement is required and recommend corrective action as deemed necessary.

The scope of the Audit will include the adequacy and effectiveness of performance against the requirements of the licence by considering:

Area	Description
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 output from systems and procedures throughout the Audit period (that is, proper records exist to provide assurance procedures are being consistently followed and controls are being 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 requirements imposed on the specific Licensee by the ERA or specific issues advised by the ERA.

2.2 Audit Compliance and Controls Rating Scale

The appropriateness of the controls and BWC compliance with the legislative obligations were reviewed against the following ratings scale.

Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improved 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

Table 1: Audit Compliance & Controls Rating Scale

2.3 Summary of Audit Ratings

BWC was assessed to have complied with the legislative obligations applicable to its activities during the Audit Period. Where deemed necessary, recommendations were made for these instances of non-compliance.

The following table provides a summary of the Audit ratings for both controls and compliance

		Compliance Rating					Total
		1 Compliant	2 Non-compliant (minor impact)	3 Non-compliant (moderate impact)	4 Non-compliant (major impact)	N/R Not rated	
Controls Rating	Rating						
	A - Adequate	153	-	-	-	45	198
	B – Generally Adequate	-	-	1	-	-	1
	C - Inadequate	-	-	-	-	-	0
	D – No controls	-	-	-	-	-	0
	NP – Not performed	-	-	-	-	12	12
Total		153	0	1	0	57	211

Detailed Audit Ratings of Control and Compliance by Obligation

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
1	21(1)(a)	4.3.1(a)		2	✓					✓				
2	21(1)(b)	4.3.1(b)	Duty to provide services and do works	2	✓					✓				
3	21(1)(c)	4.3.1		2	✓					✓				
4	22	4.4.1(a)	Provision of water services outside operating areas	4	✓					✓				
5	23	4.5.1	Works holding arrangements	4	✓					✓				
6	24(1)(a) & (2)	5.1.1	Asset management system	4	✓					✓				
7	24(1)(b)	5.1.2 & 5.1.3	Changes to asset management system	4	✓					✓				
8	24(1)(c)	5.1.4	Asset management system review	4	✓					✓				
9	25	5.3.1	Operational audit	4	✓					✓				
10	26(3)	4.1.1	Compliance with codes of practice made by Minister	2	✓					✓				
11	Not Used													
12	Not Used													
13	36	4.1.1	Ceases to provide a water service in an area	4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
14	60	6.3.1	Duty to perform functions of supplier of last resort	4	✓									✓
15	70(2)	6.2.1	Water Services Ombudsman Scheme	4	✓					✓				
16	77(3)	4.1.1	Interruption of water services generally	2	✓					✓				
17	82(4) & (5)	4.1.1	Notification of and requirements as to building work	N/A					✓					✓
18	84(2)	4.1.1	Ensuring water service works are done	2	✓									✓
19	87(2)	4.1.1	Review of certain decisions under or relating to this division	4	✓									✓
20	90(7)	4.1.1	Construction over or in vicinity of water service works of licensee	5	✓									✓
21	95(3)	4.1.1	Cannot cut off the supply of water to an occupied dwelling unless the occupier agrees to that	2	✓					✓				
22	96(1)	4.1.1	Fire hydrants	4	✓					✓				
23	96(5)	4.1.1		5	✓									✓
24	98(3)	4.1.1	Minister may require connection to sewerage works	N/A					✓					✓
25	106(2)	4.1.1	Compliance notices (discharge or wastewater inlet)	N/A					✓					✓

Obligation Under:					Controls Rating					Compliance Rating				
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	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
26	110(3)	4.1.1	Minister may require connection to drainage works	N/A					✓					✓
27	112(5)	4.1.1	Requirement to maintain or modify drainage assets	N/A					✓					✓
28	119(2)	4.1.1	Compliance notices (non-compliance with specific sections of Act)	4	✓					✓				
29	122(2)	4.1.1	Review of decisions relating to giving compliance notices	4	✓					✓				
30	125(2)	4.1.1	Supplying groups of dwellings	4	✓					✓				
31	128(4)	4.1.1	Dealings of Memorials	4	✓					✓				
32	129(5)	4.1.1	Reading meters, routine inspection and maintenance	2	✓					✓				
33	139(3)	4.1.1	Ancillary works powers	5	✓					✓				
34	141(1)	4.1.1	Special provisions applicable to road works	4	✓					✓				
35	142	4.1.1	Prerequisites to provision of major works	4	✓									✓
36	143 (2)	4.1.1	Licensee to prepare plans and publish and give notice of major works	4	✓									✓
37	143 (3)	4.1.1		4	✓									✓
38	144(3)	4.1.1	Objections and submissions	4	✓									✓

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
39	145(2)	4.1.1	Licensee may amend proposal	4	✓									✓
40	147(3)	4.1.1	Powers of Minister in respect of proposal	5	✓									✓
41	147(4)	4.1.1		5	✓									✓
42	151(1)	4.1.1	Licensee to prepare plans and give notice of general works	4	✓									✓
43	151(2)	4.1.1		4	✓									✓
44	152(3)	4.1.1	Objections and submissions	4	✓									✓
45	153(3)	4.1.1	Licensee may amend proposal	4	✓									✓
46	166(5)	4.1.1	Taking an interest in land for purposes of licensee	5	✓									✓
47	166(6)	4.1		5	✓									✓
48	170	4.1.1	Sale of land	4	✓									✓
49	173(4)	4.1.1	Entry with consent or under notice or warrant	4	✓					✓				
50	174(1)	4.1.1	Notice of entry	4	✓					✓				
51	174(3)	4.1.1		4	✓					✓				
52	175(2)	4.1.1	Rights of occupier of dwelling	4	✓									✓
53	175(5)	4.1.1	When authorised person must leave	4	✓									✓
54	176(1)	4.1.1		4	✓									✓

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
55	176(3)	4.1.1		4	✓									✓
56	176(4)	4.1.1		4	✓									✓
57	181	4.1.1	Actions of authorised persons and others	5	✓									✓
58	186	4.1.1	Contents of application (warrant to enter)	4	✓					✓				
59	187(1) – (3)	4.1.1	How application to be made (warrant to enter)	4	✓					✓				
60	190(4)	4.1.1	Execution of warrant	4	✓					✓				
61	190(5)	4.1.1	Execution of warrant	4	✓					✓				
62	210(5)	4.1.1	Designation of inspectors and compliance officers	5	✓					✓				
63	218(2)	4.1.1	Liability of certain persons for damage caused in exercise of powers	5	✓					✓				
64	218(3)	4.1.1		4	✓					✓				
65	23(2)	4.1.1	Installation of certain meters	4	✓					✓				
66	24(4)	4.1.1	Access to meters	4	✓					✓				
67	26(3)	4.1.1	Testing water meters	4	✓					✓				
68	26(5)	4.1.1		4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
69	29(1)	4.1.1	Subdivision: deferring infrastructure contributions	4	✓					✓				
70	42(2)	4.1.1	Backflow prevention devices: installation	4	✓					✓				
71	43(3)	4.1.1	Backflow prevention devices: testing and maintenance	4	✓					✓				
72	43(6)	4.1.1	Backflow prevention devices: testing and maintenance	4	✓					✓				
73	Not Used													
74	60(2)	4.1.1	Altering position of service infrastructure in roads	4	✓					✓				
75	63	4.1.1	Roads broken up to be reinstated	4	✓					✓				
76	65(1)	4.1.1	Records	4	✓					✓				
77	65(2)	4.1.1		4	✓					✓				
78 – 78A	65(4) 65(6)	4.1.1	Records to be basis for water service charges	4	✓					✓				
79	67	4.1.1		4	✓					✓				
80	68(5)	4.1.1	Objections to entries in records	4	✓									✓
81	68(6)	4.1	Objections written notice	4	✓									✓

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
82	68(7)	4.1.1	Objection process	4	✓									✓
83	68(8)	4.1.1	Objection process	4	✓									✓
84	69(3)	4.1.1	State Administrative Tribunal review of licensee's decision on objection	4	✓									✓
85	70(2)	4.1.1	SAT review: licensee's decision not to extend time for objection/review	4	✓									✓
86	74(1)	4.1.1	Amending records after objection or review	4	✓									✓
87	74(2)	4.1.1	Amending records after objection or review	4	✓									✓
88	75(1)	4.1.1	Certain information to be available to tenants and others	4	✓					✓				
88A	80H	4.1.1	Water efficiency management plan	4	✓									✓
89	85	4.1.1	Compliance notices	4	✓					✓				
90	86(6)	4.1	Infringement notices	4	✓					✓				
91	86(9)	4.1.1		4	✓					✓				
92	8(2)a	4.1.1	Information about connections	4	✓					✓				
93	9(2) (4)	4.1	Minimum performance standards: standard water supply connections	4	✓					✓				
94	10(2)	4.1.1	Fixed charge	4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
95	11(2)	4.1.1	Bills for quantities charged	4	✓					✓				
96	11(3)	4.1.1	Bills for usage	4	✓					✓				
97	11(4)	4.1.1	Bill usage based on estimate	4					✓					✓
98	11(5)	4.1.1		4	✓					✓				
98A	11(6)	4.1.1	Sending bills	4	✓					✓				
99	12	4.1.1	Sending bills	4	✓					✓				
100	13(1)	4.1.1	Information on bills	4	✓					✓				
100A	13(3)	4.1.1		4	✓					✓				
101	13(4)	4.1.1		4	✓					✓				
101A	13(5)	4.1.1		4	✓					✓				
102	Not Used													
102A	13(6)	4.1.1	Information on bills	4	✓					✓				
103	14(1)	4.1.1	Bill estimate	4	✓					✓				
104	14(2)	4.1.1		4	✓					✓				
104A	15(3)	4.1.1	Bill for usage	4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
105	16(1)	4.1.1	Customer request on meter reading and charges on request	4	✓					✓				
106	17(2) & (3)	4.1.1	Undercharging in bills	4	✓					✓				
107	18(2)	4.1.1	Undercharging in bills	4	✓					✓				
108	18(3)	4.1.1		4	✓					✓				
109	18(4)	4.1.1		4	✓					✓				
110	18(5)	4.1.1		4	✓					✓				
111	Not used													
111A	19(2)	4.1.1	Overcharge in bills	4	✓									✓
112	Not used													
112A	19(3)	4.1.1	Overcharge Notice	4	✓									✓
112B	19(4)	4.1.1	Overcharge Notice	4	✓					✓				
112C	19(5)	4.1.1	Overcharge Notice	4	✓									✓
113	20(1)	4.1.1	Review of bills	4	✓					✓				
114	20(2)	4.1.1		4	✓									✓
115	20(3) & (6)	4.1.1		4	✓									

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
116	20(4)	4.1.1		4	✓					✓				
117	20(5)	4.1.1		4	✓									✓
117A	21	4.1.1	Notification of change of charge	4		✓						✓		
118	23	4.1.1	When payment due if not set under regulations	4	✓					✓				
119	24(1)	4.1.1	Payment methods	4	✓					✓				
120	24(2)	4.1.1		4	✓					✓				
121	25(1)	4.1.1	Consent for direct debits	4	✓					✓				
122	26(1)	4.1.1	Payment in advance	4	✓					✓				
123	27	4.1.1	Free redirection in absence, illness	4	✓					✓				
124	Not used													
124A	28(2)	4.1.1	Assistance for customers experiencing payment difficulties	4	✓					✓				
124B	28(3)	4.1.1		4	✓					✓				
124C	28(4)	4.1.1		4	✓					✓				
125	29(1) & (2)	4.1.1	Financial hardship policy	4	✓					✓				
126	Not Used													

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
126A	29(3)	4.1.1	Financial hardship policy	4	✓					✓				
126B	29(4)	4.1.1		4	✓					✓				
127	29(5)	4.1.1		4	✓					✓				
128	29(6)	4.1.1		4	✓					✓				
129	Not used													
129A	29(7)	4.1.1	Review financial hardship policy	4	✓					✓				
129B	29(8)	4.1.1		4	✓									✓
129C	29(9)	4.1.1		4	✓					✓				
130	Not used													
130A	30(2)	4.1.1	Financial hardship advice	4	✓					✓				
130B	30(3)	4.1.1	Formulating payment plan	4	✓					✓				
131	Not used													
131A	30(4)(a)	4.1.1	Matters relating to customers experiencing payment difficulties or financial hardship	4	✓					✓				
131B	30(4)(b)	4.1.1		4	✓					✓				
131C	30(4)(C)	4.1.1		4	✓					✓				
132	Not used													

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
133	31(4) & (5)	4.1.1	Information on payment schemes	4	✓					✓				
133A	32	4.1.1	No interest or fees for late payments for specified circumstances	4	✓					✓				
134	33(1)(a)-(c)	4.1.1	No debt collection in certain cases	4	✓					✓				
134A	33(1)(d)-(e)	4.1.1		4	✓					✓				
135	40(1)	4.1.1	Restoration of drinking water supply	4	✓					✓				
136	40(2)	4.1.1		4	✓					✓				
137	Not used													
137A	36(1)	4.1.1	Water supply restrictions in relation to debt collection	4	✓					✓				
137B	36(2)	4.1.1	Water supply restrictions in relation to debt collection	4	✓					✓				
137C	36(3)	4.1.1		4	✓					✓				
138	37(1)(a)-(e) & (h)	4.1.1	No reduction in certain cases	4	✓					✓				
138A	37(1)(f)-(g)	4.1.1		4	✓					✓				
138B	38	4.1.1		4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
139	39	4.1.1	Water flow not to be reduced below minimum rate	4	✓					✓				
140	41(2)	4.1.1		N/A					✓					✓
141	41(3)	4.1.1		N/A					✓					✓
142	41(4)	4.1.1	Restore of services within a specified timeframe	4	✓					✓				
143	41(5)	4.1.1		N/A					✓					✓
144	41(6)	4.1.1	90% Compliance Rate	4	✓					✓				
144A-B	43(1)-(2)	4.1.1	Notice of planned service interruptions	4	✓					✓				
144C-D	44(1)-(2)	4.1.1	Policy for dealing with leaks and blockages	4	✓					✓				
144E	45	4.1.1	24 hour information line	4	✓					✓				
145-146	46(1) - (2)	4.1.1	Complaints procedure - written	4	✓					✓				
147	46(3)	4.1.1	Complaints procedure - details	4	✓					✓				
148	Not used													
148A	46(4)	4.1.1	Complaints procedure – appeal	4	✓					✓				
149	46(5)	4.1.1	Complaints procedure publicly available	4	✓					✓				
149A	47	4.1.1	Resolution of complaints	4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
150	48(1)	4.1.1	No charge for information	4	✓					✓				
151	Not used													
152	48(2)	4.1.1	Access to customer information	4	✓					✓				
153-154	49(1) – (2)	4.1.1	All information to be publicly available	4	✓					✓				
154A	49(3)	4.1.1	Link to WA website	4	✓					✓				
154B	51(1) &(3),	4.1.1	Preserved supply register	4	✓					✓				
154C	52	4.1.1	Section 95(1)(b) reduce the rate of flow	5	✓					✓				
154D	53	4.1.1	Service Interruption for preserved supply register notice is required	4	✓					✓				
155	Section 12	4.2.1	Fees to regulator	4	✓					✓				
156	Not used													
157	Not used													
158	Not used													
159	Section 12	4.1.2	Direction from ERA	4	✓									✓
159A	Not used													
160	Section 12	4.6.1	Compliance with Accounting Standards	4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
161	Section 12	5.2.1	Compliance with performance standards	4	✓					✓				
162	Section 12	5.3.4	Operational audit	4	✓					✓				
163	Section 12	4.7.1(a),(b),(c)	External administration	4	✓					✓				
164	Not used													
165	Section 12	4.8.1	Provision of information to the ERA	4	✓					✓				
166	Not used													
167	Section 12	4.8.2	Performance reporting to ERA	4	✓					✓				
168	Section 12	3.8.1, 3.8.2	Publishing information	4	✓					✓				
169	Section 12	3.7.1	Notices in writing	4	✓					✓				
170	Not used													
170A	Section 12	5.1.2(a), (b)	Notify ERA of the details of AMS within 5 business days	4	✓					✓				
171	Section 12	5.1.3	Notify ERA of material change to AMS	4	✓									✓
172	Section 12	5.1.7	AMS review	4	✓					✓				
172A	Section 12	6.1.1	Standard terms	4	✓									✓
172B	Section 12	6.1.2	Comply with directions	4	✓									✓

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
173-180	Not used													
181	Section 12	6.3.1	Supplier of last resort	4	✓					✓				
182	Section 12	4.4.1(b)	No services outside operating area	4	✓					✓				
183	Not used													
184	Section 12	7.1.1	MOU with Department of Health exist for portable water	5	✓					✓				
184A	Section 12	7.1.2		N/A					✓					✓
184B	Section 12	7.1.3		N/A					✓					✓
185	Section 12	7.1.4	MOU with Department of Health exist for portable water with specified legal standing	4	✓					✓				
186	Section 12	7.1.5	MOU – compliance	4	✓					✓				
187	Section 12	7.1.6	MOU – publishing	4	✓					✓				
188	Section 12	7.1.7	MOU – publish audit report	4	✓					✓				
189	Section 12	7.1.7	MOU-publish other	4	✓					✓				
190	Section 12	Schedule 2	Service and performance standards	4	✓					✓				
Licence Conditions – Water Services Code of Practice (Family Violence) 2020														
191	5(1)	4.1.1	Family violence policy	4	✓					✓				

Obligation Under:					Controls Rating					Compliance Rating				
No.	Water Services Act 2012	Water Services Licence Version 10	Abbreviated Description of Obligation (See the Sources Quoted Below the Heading: "Obligation Under" for the Exact Wording of the Obligation)	Audit Priority Rating (1=high, 5=low)	Refer to rating in Table 1					Refer to rating in Table 1				
	Section Number	Clause Number			A	B	C	D	NP	1	2	3	4	NR
192	5(2)	4.1.1	Family violence policy prior to 9 December 2020	4	✓					✓				
193	6	4.1.1	Publish Family Violence Policy	4	✓					✓				
194	7	4.1.1	Review Family Policy	4	✓					✓				
195	8(1)	4.1.1	Adequate record keeping in compliance with the code	4	✓					✓				
196	8(2)	4.1.1	Record retained for at least 7 years	NA					✓					✓
197	9	4.1.1	Advising customer of complaints procedure	4	✓					✓				
198	10	4.1.1	Website that has provides access to the current version of the code	4	✓					✓				

2.4 Detailed Audit Observations

Obligation Under:			Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
No.	Water Services Act 2012	Water Services Licence Version 10				Controls	Compliance
	Section Number	Clause Number					
1	21(1)(a)	4.3.1(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	Paxon confirmed that BWC did provide potable water supply services to all entitled persons under the Act during the period	A	1
2	21(1)(b)	4.3.1(b)	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.	2	Paxon confirmed that BWC provides water to the Water Corporation in terms of an agreement between the parties	A	1
3	21(1)(c)	4.3.1	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).	2	The operation and maintenance of the water service has been confirmed by Paxon. This is documented in the Asset Management Plan.	A	1
4	22	4.4.1(a)	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	Paxon confirmed with BWC representatives and observations that the licence does not provide water services outside of the operating area, Plan Number OWR-OA-085/2(E)	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
5	23	4.5.1	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	Paxon confirmed with management of BWC and upon review of the Asset Management Plan that this obligation is met.	A	1
6	24(1)(a) & (2)	5.1.1	The licensee must provide for an asset management system in respect of the licensee's water service works.	4	Paxon confirm as per the Strategic Plan Asset Management D20/47.	A	1
7	24(1)(b)	5.1.2 & 5.1.3	The licensee must give details of the asset management system and any changes to it to the ERA (the licence prescribes timeframes for providing this information to the ERA – see obligations 170A and 171)	4	Paxon confirmed BWC's asset management system were provided to ERA when implemented and changed.	A	1
8	24(1)(c)	5.1.4	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	BWC Operational and Asset Management Review was last reported by Quantum Assurance dated June 2019 available on ERA website.	A	1
9	25	5.3.1	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	BWC Operational and Asset Management Review was last reported by Quantum Assurance dated June 2019 available on ERA website.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
10	26(3)	4.1.1	The licensee must comply with each code of practice made by the Minister to the extent to which it applies to the licensee.	2	Paxon confirms that there has been no codes of practice issued by the Minister	A	1
11	Not Used						
12	Not Used						
13	36	4.1.1	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	Paxon confirms that this obligation is documented within BWC Water Compliance Reporting checklist. There were no instances where BWC had not ceased to provide water service in the operation area.	A	1
14	60	6.3.1	If the licensee is the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of the supplier of last resort and must comply with the relevant duties and carry out the relevant operations prescribed.	4	Paxon confirms that this obligation is documented within BWC Water Compliance Reporting checklist. There were no instances of last resort.	A	NR

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
15	70(2)	6.2.1	<p>The licensee must not supply water services to customers unless the licensee:</p> <ul style="list-style-type: none"> • 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	Paxon has confirmed with the Energy and Water Ombudsman (WA) Annual Reports that were issued during the review period that BWC is a member of the scheme.	A	1
16	77(3)	4.1.1	The licensee must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for.	2	Paxon has confirmed that BWC has the necessary organisational structure in place via both operational & asset management with procedural documentation to ensure that interruption of water services are mitigated effectively. Where interruptions occurred they were recorded within BWC Interrupted Supply Register and appropriate actions were followed.	A	1
17	82(4) & (5)	4.1.1	If a person must give the licensee notice of any building work to be carried out on land in the operating area of a license, the licensee must return a copy of the plans and specifications contained in the notice with any written directions about the proposed building work that the licensee considers necessary to ensure the safety and efficacy of the provision of water services provided, or to be provided.	N/A	BWC advised that there were no instances occurred during the period nor is this obligation applicate to the Licensee.	NP	NR

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			The licensee must do this within 7 days of receiving the fee for dealing with the notification.			
18	84(2)	4.1.1	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.	2	Paxon confirms that this obligation is recorded within BWC Water Compliance checklist and that no notices were issued during the review period.	A NR
19	87(2)	4.1.1	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	Paxon confirms that this obligation is recorded within BWC Water Compliance checklist and the Manager Customer Services confirmed that there were no applications during the review period.	A N/R
20	90(7)	4.1.1	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	5	Paxon confirms that this obligation is recorded within BWC Water Compliance checklist and the Manager Customer Services confirmed that there were no compliance notices issued during the review period.	A N/R

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			the person to be given the notice is not the owner of the land.			
21	95(3)	4.1.1	The licensee cannot cut off the supply of water to an occupied dwelling unless the occupier agrees to that.	2	Paxon confirms that the obligation is met with BWC 'Our Customer Commitments' policy. In addition, it is confirmed that no disconnections occurred for the purposes of debt recovery during the period. Disconnections for purposes of redevelopment were made during the period and that in such instances the occupier's agreement was obtained.	A 1
22	96(1)	4.1.1	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	The Licensee has a Memorandum of Understanding (MOU) with DFES, dated 1 July 2015 for the licence to install manage fire hydrants within the operating area.	A 1
23	96(5)	4.1.1	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	As per obligation 22.	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
24	98(3)	4.1.1	If required to by the Minister, the licensee must connect a wastewater inlet on land to the sewerage works of the licensee.	N/A		NP	N/R
25	106(2)	4.1.1	The licensee must include the information specified in a compliance notice given in relation to failure to maintain fittings, fixtures and pipes.	N/A		NP	N/R
26	110(3)	4.1.1	If required to by the Minister, the licensee must connect a drainage asset on land to the drainage works of the licensee.	N/A		NP	N/R
27	112(5)	4.1.1	If required by the Minister, drainage connection.	N/A		NP	N/R
28	119(2)	4.1.1	The licensee must include the information specified in a compliance notice given in relation to the matters set out in section 119(1).	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation, as per the BWC Water Compliance checklist. There were no compliance notices issued during the review period.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
29	122(2)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation, as per the BWC Water Compliance checklist. There were no applications to the State Administrative Tribunal during the review period.	A	1
30	125(2)	4.1.1	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 <i>Strata Titles Act 1985</i> .	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation, as per the BWC Water Compliance checklist. There were no apportionment of fees during the audit review period.	A	1
31	128(4)	4.1.1	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	Paxon confirms that there no memorials lodged with the Register during the audit period.	A	1
32	129(5)	4.1.1	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	2	Paxon confirms that the licensee meet this obligation by having in place Policy P16. Asset Management and Operating	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			given to the occupier of the place unless the occupier agrees otherwise.		Procedures and Work Instructions. The review confirmed appropriate notice via letters of 48 hours notice has been given.	
33	139(3)	4.1.1	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	Paxon confirms that the licensee meet this obligation by having in place Policy P16. Asset Management and Operating Procedures and Work Instructions. The Licensee confirmed that there were no fences or gates removed or built during the review period and as such no notifications to owners were required.	A 1
34	141(1)	4.1.1	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	Paxon confirms that the licensee met this obligation by having in place Policy P16. Asset Management and Operating Procedures and Work Instructions, sampled notices were sighted during the review to the Busselton Shire Council provided the appropriate notices of works within the time period as per the obligation.	A 1
35	142	4.1.1	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	Paxon confirms BWC has the appropriate policy and procedure documentation, as per the BWC Water Compliance checklist. There were no major works, as defined by	A N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
					the <i>Water Services Act 2012</i> during the review period.		
36	143 (2)	4.1.1	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	Paxon confirms BWC that the appropriate policy and procedure documentation e.g F98 Planning Template., as per the BWC Water Compliance checklist. There were no activity during the review period.	A	N/R
37	143 (3)	4.1.1	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 36.	A	N/R
38	144(3)	4.1.1	The licensee must have regard to an objection or submission lodged within the relevant period.	4	As per obligation 36.	A	N/R
39	145(2)	4.1.1	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 36.	A	N/R
40	147(3)	4.1.1	The licensee must comply with a direction given by a Minister in respect of a proposal to provide water service	5	As per obligation 36.	A	N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			works that are major works under section 143(3).				
41	147(4)	4.1.1	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.	5	As per obligation 36.	A	N/R
42	151(1)	4.1.1	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	Paxon confirms BWC has the appropriate control environment by having policy and procedure documentation as per the BWC Water Compliance checklist.	A	N/R
43	151(2)	4.1.1	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	As per obligation 42.	A	N/R
44	152(3)	4.1.1	The licensee must have regard to an objection or submission lodged by the date specified in the notice given under section 151(2).	4	As per obligation 42.	A	N/R
45	153(3)	4.1.1	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	As per obligation 42.	A	N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
46	166(5)	4.1.1	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.	5	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. BWC confirmed that no advice was received during the review period.	A	N/R
47	166(6)	4.1	Any costs incurred in taking an interest in land are to be paid by the licensee.	5	As per obligation 46.	A	N/R
48	170	4.1.1	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 <i>Planning and Development Act 2005</i> , unless the Minister permits the licensee to do so.	4	As per obligation 46.	A	N/R
49	173(4)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. In addition supported with the "Our Customer Commitments" charter that is readily available on BWC website. Notice provided to owners were as per the licence obligations.	A	1
50	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,	4	As per obligation 49.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			including (if applicable) any work proposed to be carried out.				
51	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.	4	As per obligation 49.	A	1
52	175(2)	4.1.1	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	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, there were no instances of this during the review period.	A	N/R
53	175(5)	4.1.1	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	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, there were no instances of this during the review period.	A	N/R
54	176(1)	4.1.1	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	4	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager	A	N/R

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			owner or occupier has refused or withdrawn their consent.		Customer Service, there were no instances of this during the review period.	
55	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.	4	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist.	A N/R
56	176(4)	4.1.1	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	Paxon confirms has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. All staff carry the appropriate identification and uniform. There were no instances where staff were asked to leave a property due to lack of appropriate authority.	A N/R
57	181	4.1.1	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	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. There were no instances where a request where owners or occupiers to leave the property.	A N/R
58	186	4.1.1	If the licensee applies for a warrant, the application must contain the prescribed information.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
					Water Compliance checklist. There were no instances during the review period.		
59	187(1) – (3)	4.1.1	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.	A	1
60	190(4)	4.1.1	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.	A	1
61	190(5)	4.1.1	On completing the execution of a warrant the licensee must record the prescribed information on that warrant.	4	As per obligation 58.	A	1
62	210(5)	4.1.1	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.	5	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, there were no one employed as inspector or compliance office.	A	1
63	218(2)	4.1.1	In the exercise or purported exercise of a power under the Act, the licensee must ensure that, to the extent	5	As per obligation 62.	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			practicable, the free use of any place is not obstructed, and that as little damage, harm or inconvenience is caused as is possible.			
64	218(3)	4.1.1	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	As per obligation 62.	A 1
65	23(2)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, there were none received during the review period.	A 1
66	24(4)	4.1.1	If the licensee gives a compliance notice to a person in respect of access to meters, the notice must specify the specified information.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, there were no requests received during the review period.	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
67	26(3)	4.1.1	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	Paxon confirms that BWC has the appropriate procedures in place to meet this obligation. This is via 'Testing of Water Meters', P14.PR06. BWC advised that there were no instances of meters having results outside the tolerance levels as per BWC policy.	A	1
68	26(5)	4.1.1	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	Paxon confirms that BWC has the appropriate procedures in place to meet this obligation. This is via 'Testing of Water Meters', P14.PR06. BWC advised that there were no instances of meters having results outside the tolerance levels as per BWC policy.	A	1
69	29(1)	4.1.1	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	Paxon confirms that BWC has the appropriate procedures in place to meet this obligation. This is via 'Deferred Headworks Payments' P13.PR04. BWC advised that there were no requests during the review period.	A	1
70	42(2)	4.1.1	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	4	Paxon confirms that BWC has the appropriate procedures in place to meet this obligation. This is via 'Backflow Prevention Device' P13.PR09. BWC advised that there were no requests during the review period.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			order is given to the owner or occupier).				
71	43(3)	4.1.1	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	Paxon confirms that BWC has the appropriate procedures in place to meet this obligation. This is via 'Backflow Prevention Device' P13.PR09. BWC advised that there were no tests during the review period.	A	1
72	43(6)	4.1.1	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	As per obligations 71.	A	1
73	Not Used						
74	60(2)	4.1.1	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	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			the person make the alterations within the time specified in the notice.		Customer Service, there were no recorded instances.	
75	63	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service.	A 1
76	65(1)	4.1.1	The licensee must maintain records for all land in respect of which water service charges apply.	4	Paxon confirm this obligation is met by the license, via sophisticated rates system, electronic and hard copies.	A 1
77	65(2)	4.1.1	The records for all land in respect of which water service charges apply must contain the prescribed information.	4	Paxon confirms the licensees records are being retained as per the requirements of this obligation. Paxon sighted samples of customer's information to confirm they retained the necessary information.	A 1
78	65(4)	4.1.1	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 prescribed charge, if any, for giving a copy of the records.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, and as per the 'Our Customer Commitments Charter'.	A 1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
78A	65(6)	4.1.1	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.		As per obligation 78.	A 1
79	67	4.1.1	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	Paxon confirms that BWC did comply with the stipulations of this clause during the period as all residential customers were charged the same service charge whilst business customers were charged for services with reference to size of meter. This was confirmed also by the Senior Business Service Officer.	A 1
80	68(5)	4.1.1	The licensee must consider an objection to the records maintained by a licensee under regulation 65 as soon as practicable.	4	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, and there was no record of objections during the review period.	A N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
81	68(6)	4.1	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	As per obligation 80.	A	N/R
82	68(7)	4.1.1	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	As per obligation 80.	A	N/R
83	68(8)	4.1.1	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	As per obligation 80.	A	N/R
84	69(3)	4.1.1	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	As per obligation 80.	A	N/R
85	70(2)	4.1.1	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	4	As per obligation 80.	A	N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			decision to the State Administrative Tribunal for a review.				
86	74(1)	4.1.1	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 <i>Valuation of Land Act 1978</i> or as a consequence of a review by the State Administrative Tribunal.	4	As per obligation 80.	A	N/R
87	74(2)	4.1.1	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	As per obligation 80.	A	N/R
88	75(1)	4.1.1	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	Paxon confirmed compliance of this obligation by the licensee by reviewing a sample of invoices to determine the appropriate information that is provided so the customer can determine their liability under their respective lease agreements.	A	1
88A	80H	4.1.1	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	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, and there were no requests during the review period.	A	N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
89	85	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This was confirmed also by the Manager Customer Service, and there were no notices during the review period.	A	1
90	86(6)	4.1	If the licensee appoints an employee as an authorised or approved officer for the purposes of the <i>Criminal Procedure Act 2004</i> 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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. There were no compliance officers appointed during the review period.	A	1
91	86(9)	4.1.1	The licensee must maintain a list of persons appointed to be authorised officers or approved officers for the purposes of the <i>Criminal Procedure Act 2004</i> 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 <i>Criminal Procedure Act 2004</i> .	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. The Manager Customer Service confirmed there were no appointments of employees under this obligation during the review period.	A	1
92	8(2)a	4.1.1	The licensee must have written information for customers about the prescribed matters regarding	4	Paxon confirms that BWC complies with this obligation as per the Licensees charter 'Our Customer Commitments'. Other relevant	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			connections and the information must be publicly available.		information pertaining to the customers meters and fees and charges are readily available on the licensee's website.	
93	9(2) (4)	4.1	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	Paxon can confirm that the licensee has met the requirements of this obligation. Paxon has sighted and reviewed the New Services Report, where it captures the 10 business dates requirements as per this obligation. The review of this report noted that BWC did meet the requirements. In addition to this, it is noted that General Manager Operations, monitors this via monthly reports	A 1
94	10(2)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This is confirmed by Senior Business Service Officer by a review of a sample within the audit period.	A 1
95	11(2)	4.1.1	If the licensee charges a quantity charge, the licensee must issue a bill - for a quantity charge to each customer at least once in every 4-month period.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This is confirmed by Senior Business Service Officer, via a sample of	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
					invoices that were provided during the review period, were issued to customers every 4 months.		
96	11(3)	4.1.1	A bill for usage must be based on a meter reading to ascertain the quantity supplied or discharged.	4	Paxon can confirm that water consumption is based on meter readings by the licensee.	A	1
97	11(4)	4.1.1	If an accurate meter reading is not possible, a bill for usage must be based on an estimate, in accordance with the prescribed regulations (if any), of the quantity of water supplied or wastewater discharged. (Note: The <i>Water Services Regulations 2013</i> did not address the estimation of bills at the time this Reporting Manual was published).	4	Not applicable	N/A	N/A
98	11(5)	4.1.1	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 prescribed methods.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. As per BWC procedure 'Bill Estimates', P12.PR09. BWC did estimate water usage in cases where accurate meter readings were not possible during the period.	A	1
98A	11(6)	4.1.1	Despite subclauses 11(4) and (5), a bill for usage based on a meter reading	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			must be issued at least once in every 12-month period.		Water Compliance checklist. As per BWC procedure 'Bill Estimates', P12.PR09.	
99	12	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, in addition to the sample audit of customer invoices to support the confirmation over the review period.	A 1
100	13(1)	4.1.1	Each bill must contain the prescribed information.	4	As per Obligation 99.	A 1
100A	13(3)	4.1.1	A bill issued for 2 or more water services must specify the charge payable for each water service.	4	As per Obligation 99.	A 1
101	13(4)	4.1.1	Each bill for usage for a metered water service must contain the specified information.	4	As per Obligation 99.	A 1
101A	13(5)	4.1.1	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	As per Obligation 99.	A 1
102	Not Used					

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
102A	13(6)	4.1.1	Each bill must contain the prescribed information.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, in addition to the sample audit of customer invoices to support the confirmation over the review period	A	1
103	14(1)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, reference to procedure 'Bill Estimates' and BWC's website document 'Estimating Your Bill Information Sheet. Water supply tax invoices issued, in respect of estimates during the period did disclose the reason for the estimate.	A	1
104	14(2)	4.1.1	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	As per obligation 103.	A	1
104A	15(3)	4.1.1	Each bill for usage to which clause 15 applies must, in addition to the	4	Paxon confirms BWC compliance with this obligation by having the	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			requirements of clause 13, contain the prescribed information.		appropriate policy and procedure documentation as per the BWC Water Compliance checklist, in addition to the sample audit of customer invoices to support the confirmation over the review period. This is supported by the relevant information pertaining to this obligation via fact sheets on BWC's website.	
105	16(1)	4.1.1	The licensee must provide to the customer on request a meter reading and a bill (or revised bill if applicable) for outstanding charges outside of the usual bill cycle, or in case the customer disputes an estimate.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, in addition to the sample audit of customer invoices to support the confirmation over the review period.	A 1
106	17(2) & (3)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per P12.PR32 Leak Allowance policy that is publicly available on the website.	A 1
107	18(2)	4.1.1	The licensee cannot recover an undercharged amount from a customer unless it is for water services provided	4	Paxon confirms there was no undercharging during the review	A 1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			in the 12-month period ending on the day on which the licensee informed the customer of the undercharging.		period. Confirmation of adherence of this obligation is as per P12.PR019, "Bill Review".	
108	18(3)	4.1.1	An undercharged amount must be the subject of, and explained in, a special bill or a separate item in the next bill.	4	As per Obligation 107.	A 1
109	18(4)	4.1.1	The licensee must not charge interest or late payment fees on an undercharged amount.	4	As per Obligation 107.	A 1
110	18(5)	4.1.1	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.	4	As per Obligation 107.	A 1
111	Not used					
111A	19(2)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per P12.PR019, "Bill Review, that is publicly available on the website via 'Review your Bill'. A sample was reviewed within the audit period with the Senior Business Service Officer and no instances were recorded.	A N/R

Obligation Under:								
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)		
	Section Number	Clause Number				Controls	Compliance	
112	Not used							
112A	19(3)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per P12.PR019, "Bill Review", that is publicly available on the website via 'Review your Bill'. A sample was reviewed within the audit period with the Senior Business Service Officer and no instances were recorded.	A	N/R	
112B	19(4)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per P12.PR019, "Bill Review". Confirmation via Manager Customer Service that there were none recorded during the review period.	A	1	
112C	19(5)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per P12.PR019, "Bill Review". A review	A	N/R	

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
					of a sample period noted no instances.	
113	20(1)	4.1.1	The licensee must review a bill on the customer's request.	4	BWC adhered to this obligation as per P12.PR019, "Bill Review". As per Paxon's review of sampled invoices, the Senior Business Service Officer confirmed the process.	A 1
114	20(2)	4.1.1	The license must have a written procedure for the review of a bill on the customer's request.	4	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per per P12.PR019, "Bill Review", that is publicly available on the website via 'Review your Bill'.	A N/R
115	20(3) & (6)	4.1.1	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	Paxon confirms that the licensee has the necessary information available online via its website and in hard copy when requested.	A N/R
116	20(4)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per per P12.PR019, "Bill Review", that is publicly available on the website via 'Review your Bill'.	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
117	20(5)	4.1.1	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	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, as per P12.PR019, "Bill Review".	A	N/R
117A	21	4.1.1	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).	4	<p>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.</p> <p>Recommendation 01/2022</p> <p>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.</p>	B	3
118	23	4.1.1	The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, Paxon	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
					sample auditing confirmed the obligation requirements being adhered to by BWC		
119	24(1)	4.1.1	The licensee must allow a customer to pay a bill using any of the prescribed methods selected by the customer.	4	As per this obligation, BWC meet the requirements as per the Code of Conduct, a sample of invoices were sighted for water charged to customers and the review determined that the invoice amounts included the applicable payment methods.	A	1
120	24(2)	4.1.1	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	BWC customer invoices state the transaction fee that twill apply to payments where fees and charges are applicable.	A	1
121	25(1)	4.1.1	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	Paxon can confirm that BWC uses a document entitled 'Direct Debit Request Application' during the review period. This document provides for the signature of both the account holder and the applicant(s).	A	1
122	26(1)	4.1.1	The licensee must accept payment in advance from a customer on a customer's request.	4	Paxon confirms that BWC has a procedure document titled 'Refund of credit balances-water supply debtors'. BWC did accept payment in advance from a customer on a customer's request during the audit period.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
123	27	4.1.1	The licensee must on request and at no charge redirect a customer's bills because of the customer's absence or illness.	4	Paxon can confirm that this obligation was met by the licensee, via the Customer Service Manager that on request bills were redirected and at no charge.	A	1
124	Not used						
124A	28(2)	4.1.1	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	Paxon can confirm that BWC has an active procedure called 'Financial Hardship' and information sheet on the website. BWC did allow customers to pay bills under a payment plan or other arrangement under which the customer is given more time to pay the bill or to pay arrears during the period. This was determined via a sample of customer invoices that were sighted from within the review period. Water supply tax invoices refers to 'payment difficulties' and request such customers to contact BWC. This is also aligned with P12.PR016 Payment Arrangements – Water Supply Invoices.	A	1
124B	28(3)	4.1.1	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	4	Paxon can confirm that BWC has an active procedure called 'Financial Hardship' and information sheet on the website. BWC did allow customers to pay bills under a payment plan or other arrangement	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			licensee must also take into account how much water has been supplied or wastewater has been discharged in previous billing periods.		<p>under which the customer is given more time to pay the bill or to pay arrears during the period.</p> <p>The Business Service Officers that deal with these instances actively support the customers with their payment plans. They are trained to follow the procedure document. As part of Paxon's interview with the staff, they advise that they work with the customers to ensure that the payments plans are economic both for BWC and the customer.</p> <p>Water supply tax invoices refers to 'payment difficulties' and request such customers to contact BWC. This is also aligned with P12.PR016 Payment Arrangements – Water Supply Invoices.</p>	
124C	28(4)	4.1.1	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	Paxon can confirm that BWC has an active procedure called 'Financial Hardship' and information sheet on the website. BWC did allow customers to pay bills under a payment plan or other arrangement under which the customer is given more time to pay the bill or to pay arrears during the period. The Business Service Officers that deal with these instances actively support the customers with their payment plans and considerations for penalties are applied based on the	A 1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
					customers history and is treated on a case by case scenario, and if they are either interest-free, fee-free or both. Water supply tax invoices refers to 'payment difficulties' and request such customers to contact BWC. This is also aligned with P12.PR016 Payment Arrangements – Water Supply Invoices	
125	29(1) & (2)	4.1.1	The licensee must have a written policy in relation to financial hardship that is approved by the ERA.	4	Paxon confirms that BWC has a policy titled P12 PR012 Financial Hardship. The amended policy was approved by ERA in December 2018, there have been no amendments since.	A 1
126	Not Used					
126A	29(3)	4.1.1	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.	A 1
126B	29(4)	4.1.1	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.	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
127	29(5)	4.1.1	The licensee's financial hardship policy must be in effect within 6 months of the day of the grant of the license.	4	Paxon can confirm that the hardship policy was in place within 6 months of the licence being granted.	A	1
128	29(6)	4.1.1	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	Paxon can confirm that the financial hardship policy is available on the website.	A	1
129	Not used						
129A	29(7)	4.1.1	The licensee must review its financial hardship policy at least once in every 5-year period.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager, that the financial hardship policy was last reviewed in December 2018.	A	1
129B	29(8)	4.1.1	The licensee must review its financial hardship policy if directed to do so by the ERA.	4	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager. There has been no requests from ERA to review this policy prior to the five year period.	A	N/R
129C	29(9)	4.1.1	The licensee must consult with relevant consumer organisations when formulating or reviewing its financial hardship policy.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
					per the Customer Service Manager, WACOSS was consulted as part of the review in 2020.		
130	Not used						
130A	30(2)	4.1.1	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	Paxon can confirm that BWC has an active procedure called 'Financial Hardship' and information sheet on the website. BWC did allow customers to pay bills under a payment plan or other arrangement under which the customer is given more time to pay the bill or to pay arrears during the period. This was also confirmed by the Senior Business Service Officer.	A	1
130B	30(3)	4.1.1	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	As per obligation 130A.	A	1
131	Not used						

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
131A	30(4)(a)	4.1.1	Matters relating to customers experiencing payment difficulties or financial hardship	4		A	1
131B	30(4)(b)	4.1.1	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	As per obligation 130A.	A	1
131C	30(4)(C)	4.1.1	The licensee must provide the specified written information to a customer.	4	As per obligation 130A.	A	1
132	Not used						
133	31(4) & (5)	4.1.1	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	As per obligation 130A.	A	1
133A	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.	4	As per obligation 130A.	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
134	33(1)(a)-(c)	4.1.1	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	Paxon can confirm that BWC complied with this obligation during the review period. Paxon reviewed a sample of debt arrangements during the audit period with the Senior Business Service Officer and confirmed the practicable approach to debt collection which is as per the policy and also considerate to the customer's changing circumstances.	A 1
134A	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).	4	As per obligation 134.	A 1
135	40(1)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager, that the procedure document P12.PR10 Water Sales Debt Recovery and P12.PR21 Installation and Removal of Restriction Devices,	A 1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
					through sample testing confirm the adherence to this obligation.	
136	40(2)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager, that the procedure document P12.PR10 Water Sales Debt Recovery and P12.PR21 Installation and Removal of Restriction Devices, through sample testing confirm the adherence to this obligation.	A 1
137	Not used					
137A	36(1)	4.1.1	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 35), the water service charge has still not been paid in full, and the licensee has given the customer a restriction notice.	4	Paxon confirms procedure in place called 'Installation and Removal of Restriction Devices'. BWC did comply with the stipulations of this clause during the period. BWC's procedure includes five different notifications to the customer prior to reduction in water flow: note on the relevant water supply tax invoice, further notice, 72 hour notice, site visit and door knock on date of reduction.	A 1
137B	36(2)	4.1.1	The licensee must not give a customer a restriction notice less than 7 days	4	Paxon confirms procedure in place called 'Installation and Removal of Restriction Devices' and adherence	A 1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			before the day on which the water supply restriction is proposed to start.		of this obligation during the review period, this was confirmed via the sample that was reviewed over the audit period.	
137C	36(3)	4.1.1	The restriction notice must include the specified information.	4	As per obligation 137B.	A 1
138	37(1)(a)-(e) & (h)	4.1.1	The licensee must not start a water supply restriction if the specified circumstances apply.	4	Paxon confirms procedure in place called 'Installation and Removal of Restriction Devices' and adherence of this obligation during the review period, via a sample during the period and as per the interview with the Senior Business Service Officer.	A 1
138A	37(1)(f)-(g)	4.1.1	The licensee must not start a water supply restriction if the specified circumstances apply.	4	Refer to obligation 138.	A 1
138B	38	4.1.1	The licensee must not start a water supply restriction on or during the specified times.	4	Refer to obligation 138.	A 1
139	39	4.1.1	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	Refer to obligation 138.	A 1
140	41(2)	4.1.1	The Water Corporation must restore a water supply to land in the metropolitan region within the specified timeframe,	N/A		NP N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			unless the licensee and customer expressly agree otherwise.				
141	41(3)	4.1.1	The Water Corporation must restore a water supply to land outside the metropolitan region within the specified timeframe, unless the licensee and customer expressly agree otherwise.	N/A		NA	NA
142	41(4)	4.1.1	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	Paxon confirms that the 'Installation and Removal of Restriction Devices' procedure section 2, provides guidance for this obligation. From the sample of information provided, and as per Senior Business Service Officer, confirmed that where they did restore water supply, it is as per the following: in cases, where the restoration event occurred before 3pm on a business day-on the same business day; and in cases where the restoration event occurred after 3pm on a business day - by the next business day.	A	1
143	41(5)	4.1.1	The Water Corporation must ensure that there is a 90% compliance rate with clauses 41(2) and 41(3) in any 12-month period ending on 30 June.	N/A		NA	NA
144	41(6)	4.1.1	The licensee (other than the Water Corporation) must ensure that there is	4	Paxon confirms procedure in place called 'Installation and Removal of	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			a 90% compliance rate with clause 41(4) in any 12-month period ending on 30 June.		Restriction Devices' and adherence of this obligation during the review period.		
144A	43(1)	4.1.1	The licensee must give notice of any planned service interruption to each customer that will be affected by the service interruption.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist that the procedure document PR16.PR010 Asset Management and Operating Work Instructions. This was confirmed via the sample reviewed during the audit and as per the interview with the Customer Service Manager.	A	1
144B	43(2)	4.1.1	The notice of any planned service interruption must be given within the prescribed timeframes.	4	As per obligation 144A.	A	1
144C	44(1)	4.1.1	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	As per obligation 144A.	A	1
144D	44(2)	4.1.1	The policies, practices and procedures under clause 44(1) must deal with the prescribed matters.	4	As per obligation 144A	A	1
144E	45	4.1.1	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	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
			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.		Water Compliance checklist, and as per the Customer Service Manager, Telephone number 08 9781 0500 serves this purpose. Calls are answered by Busselton Water staff during normal working hours. The number is automatically answered by an After-Hours Call Centre at all other times.	
145	46(1)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager as per policy PR12.PR021 Complaints Management	A 1
146	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).	4	Licensee confirms the Customer Service Manager as per policy PR12.PR021 Complaints Management, was developed to align with this obligation requirements.	A 1
147	46(3)	4.1.1	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.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager as per policy PR12.PR021 Complaints Management	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
148	Not used						
148A	46(4)	4.1.1	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager as per policy PR12.PR021 Complaints Management	A	1
149	46(5)	4.1.1	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	Paxon confirm that this obligation is being met with access to the Complaints Management policy, PR12.PR021 is available via the website and on request.	A	1
149A	47	4.1.1	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.	4	Paxon confirm that this obligation is being met with adherence to the Complaints Management policy, PR12.PR021, as advised by interview with the Customer Service Manager where samples from the audit period were reviewed and the process followed as per BWC policy.	A	1
150	48(1)	4.1.1	The licensee must provide a customer with the specified services on request and at no charge.	4	Paxon confirms adherence to this obligation as per BWC 'Our Customer Commitments' and 'Water Services Information Sheet.'	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
151	Not used					A 1
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.	4	Paxon confirms adherence to this obligation as per BWC 'Our Customer Commitments' and 'Water Services Information Sheet.'	A 1
153	49(1)	4.1.1	The licensee must make the prescribed information publicly available.	4	Paxon confirms that the requirements of this obligation are met with Code of Conduct information available via website 'Estimating your bill', 'Our Customer Commitments-Requested Meter Readings', 'Review Your Bill' and 'Customer Complaints Information Sheet'	A 1
154	49(2)	4.1.1	The licensee must ensure that the specified information about bills may be obtained from its website.	4	Paxon confirms that the requirements of this obligation are met with Code of Conduct information available via website and on request.	A 1
154A	49(3)	4.1.1	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	4	Paxon reviewed BWC's website and confirmed that this obligation is being met.	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			access to electronic versions of Western Australian legislation.				
154B	51(1) &(3),	4.1.1	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 51(2). The register must record the prescribed information in clause 51(3) if the criteria in clause 51(2) applies to the licensee.	4	Paxon reviewed with the Customer Service Manager, R29 - Emergency Notification Register, confirmed that the obligation is being met.	A	1
154C	52	4.1.1	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.	5	As per obligation 154B.	A	1
154D	53	4.1.1	Despite clause 43(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 43(1) must be sent by post or delivered to that supply address.	4	As per obligation 154B.	A	1
155	Section 12	4.2.1	The licensee must pay the applicable fees and charges in accordance with the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i>	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager	A	1

Obligation Under:						
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)
	Section Number	Clause Number				Controls Compliance
					and review of the annual fee amounts that were paid to the ERA were applicable for the period.	
156	Not used					
157	Not used					
158	Not used					
159	Section 12	4.1.2	The licensee must comply with a direction from the ERA in relation to a breach of applicable legislation.	4	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist, and as per the Customer Service Manager.	A N/R
159A	Not used					
160	Section 12	4.6.1	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	BWC maintains accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards. The Office of Auditor General expressed unqualified audit opinions in respect of the annual financial statements. Paxon confirms compliance with this obligation.	A 1
161	Section 12	5.2.1	The licensee must comply with any individual performance standards prescribed by the ERA.	4	Paxon confirms that BWC complies with this obligation as per the Water Services Operating License and	A 1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
					Water Services Compliance Reporting Manual, as issued by the ERA. Schedule 3 of the WSOL stipulates specific standards (values) for continuity of pressure and flow of water. The performance report datasheets indicates that the percentage of connected properties that have been supplied at a pressure and flow that meets the standards set out in the licence		
162	Section 12	5.3.4	The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the operational audit.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. This review is as per the ERA Audit Guidelines. BWC management and staff have assisted professionally with this review.	A	1
163	Section 12	4.7.1(a),(b),(c)	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	The licensee is not under external administration during the review period.	A	1
164	Not used					A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
165	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.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. In accordance with the Water Compliance Reporting Manual 2021, the licensee is required to submit to the ERA Annual Performance Reports and Compliance reports by the legislated due dates. Paxon can confirm that during the review period, BWC met this obligation.	A	1
166	Not used					A	1
167	Section 12	4.8.2	The licensee must provide the ERA with the data required for performance reporting purposes that is specified in the <i>Water, Sewerage and Irrigation Licence Performance Reporting Handbook</i> , and the National Performance Framework that apply to the licensee.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. Paxon can confirm that during the review period, BWC met this obligation.	A	1
168	Section 12	3.8.1, 3.8.2	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	The licensee was not directed by ERA during the audit period as per the conditions of this obligation.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
169	Section 12	3.7.1	Unless otherwise specified, all notices must be in writing.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. Paxon can confirm that during the review period, BWC met this obligation as all correspondence is written letters or email.	A	1
170	Not used					A	1
170A	Section 12	5.1.2(a), (b)	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 b) the completion of construction of the licensee's water service works.	4	BWC has met this obligation. There has not been any notification required during the review period.	A	1
171	Section 12	5.1.3	The licensee must notify the ERA of any material change to the asset management system within 10 business days of the change.	4	Paxon confirms BWC has the appropriate policy and procedure documentation as per the BWC Water Compliance checklist.	A	N/R
172	Section 12	5.1.7	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	Paxon can confirm that BWC has complied with this obligation, including providing all the necessary assistance.	A	1
172A	Section 12	6.1.1	If the ERA considers that one or more of a licensee's standard terms and	4	ERA has not directed BWC during the review period as per this	A	N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			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 b) to do so within a specified period.		obligation. BWC's Water Service Licence (version 10) was renewed in June 2021.		
172B	Section 12	6.1.2	The licensee must comply with a direction given to the licensee under clause 6.1.1	4	As per obligation 172A	A	N/R
173-180	Not used						
181	Section 12	6.3.1	If the licensee is appointed as the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of a supplier of last resort, comply with the duties imposed by the Act and carry out its operations under or for the purpose of the last resort plan in accordance with the Act.	4	Paxon confirmed with Business Service Manager that BWC was not appointed a supplier of last resort during the review period.	A	1
182	Section 12	4.4.1(b)	If the licensee provides a water service outside of the operating area the	4	Paxon confirmed with BWC representatives and observations	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			licensee must apply to amend the licence unless otherwise notified by the ERA.		that the licence does not provide water services outside of the operating area, Plan Number OWR-OA-085/2(E)		
183	Not used						
184	Section 12	7.1.1	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.	5	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist and as per the procedure Water Compliance Reporting and the Document Management for the MoU between the DoH and BWC procedure. The audit sighted the Memorandum of Understanding for Drinking Water with the Department of Health (MOU).	A	1
184A	Section 12	7.1.2	Where the licensee provides sewerage services, the licensee must, if required by the Department of Health, enter into a Memorandum of Understanding with the Department as soon as practicable after the commencement date or as otherwise agreed with Department.	N/A		N/P	N/R
184B	Section 12	7.1.3	If the licensee provides both potable water and sewerage services, the licensee must enter into a separate Memorandum of Understanding with	N/A		N/P	N/R

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			the Department of Health in respect of each of the potable water service and sewerage service.				
185	Section 12	7.1.4	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	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist and as per the procedure Water Compliance Reporting and the Document Management for the MoU between the DoH and BWC procedure. The audit sighted the Memorandum of Understanding for Drinking Water with the Department of Health (MOU).	A	1
186	Section 12	7.1.5	The licensee must comply with the terms of a Memorandum of Understanding.	4	As per obligation 185.	A	1
187	Section 12	7.1.6	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	The audit confirmed that the MOU is published on BWC website.	A	1
188	Section 12	7.1.7	The licensee must publish the audit report on compliance with its obligations under a Memorandum of Understanding on its website within	4	The Licensee confirms that there has been no audit by the Department of Health during the review period.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
			one month of the completion of the audit.				
189	Section 12	7.1.7	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	Paxon can confirm that drinking quality reports are regularly published on BWC website during the review period.	A	1
190	Section 12	Schedule 2	Service and performance standards	4		A	1
Licence Conditions – Water Services Code of Practice (Family Violence) 2020							
191	5(1)	4.1.1	The licensee must have a family violence policy that sets out the matters specified in clause 5(1).	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy that sets out the requirements as per Clause 5(1).	A	1
192	5(2)	4.1.1	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	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist.	A	1
193	6	4.1.1	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.	4	Paxon confirms that BWC Family Violence Policy is available on the website and on request at no charge.	A	1

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
194	7	4.1.1	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.	4	Paxon confirms that BWC Family Violence Policy was last prepared in May 2021, will not need to be reviewed for 5 years. There has been no requests by the Minister during the audit period	A	1
195	8(1)	4.1.1	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 <i>State Records Act 2000 (WA)</i> , then records must be maintained in accordance with its obligations under that Act.	804	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. With an approved Record Keeping Plan as issued by the State Records Commission of WA, 31 October 2019. A review of the plan will be required within five years of this date.	A	1
196	8(2)	4.1.1	If the licensee is not a government organisation according to the <i>State Records Act 2000 (WA)</i> , a record that relates to a customer, must be retained for at least 7 years after the last communication between the licensee and the customer, or water services ombudsman. If the record does not relate to a customer, then the record must be kept for at least 7 years after the record is made.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. With an approved Record Keeping Plan as issued by the State Records Commission of WA, 31 October 2019.	NA	NA

Obligation Under:							
No.	Water Services Act 2012	Water Services Licence Version 10	Description	Audit Priority Rating (1=high, 5=low)	Observations & Recommendations	Ratings (as per Table 1)	
	Section Number	Clause Number				Controls	Compliance
197	9	4.1.1	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.	4	Paxon confirms BWC compliance with this obligation by having the appropriate policy and procedure documentation as per the BWC Water Compliance checklist. By interview with the Manager Customer Services and other relevant staff, it is confirmed that when a customer states that they are affected by family violence they are advising them of the complaints procedure.	A	1
198	10	4.1.1	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.	4	Paxon confirms that BWC met the requirements as per this obligation.	A	1

2.5 Previous Audit Recommendations

Table 2 Previous Audit Non-Compliances and Recommendations

Resolved during the current audit period

No.	Adequacy of Controls and Compliance Rating / Legislative Reference Description	Auditor's Recommendation	Management Action	Auditor Review
11	<p>B2; Code of Conduct, Section 27 The licensee must comply with the code of conduct that may be made by the ERA to the extent to which it applies to the licensee and is not inconsistent with the licence.</p>	<p>The audit reviewed compliance with the <i>Water Services Code of Conduct (Customer Service Standards) 2018 and previous versions</i> as per obligations listed in this audit report, and concluded that the licensee complies with the Code of Conduct with the exception of 1 non-compliance with a moderate effect on customers and 11 non-compliances with a minor effect on customers.</p>	<p>The non-compliance with moderate effect on customers is listed in table 1 the remaining 11 non-compliances with a minor effect on customers are listed in this table including this item. Action by BWC to address these recommendations is listed in tables 1 and 2.</p>	<p>Paxon can confirm in review with Business Service Manager that this has been actioned by BWC during the audit period.</p>
12	<p>B 2; Act Compliance, Section 29 The licensee must comply with the duties imposed on it by the Act in relation to its licence and must carry out its operations in respect of the licence in accordance with the Act.</p>	<p>The auditor reviewed compliance with the Water Services Act 2012, Water Services Regulations 2013 and the Water Services Code of Conduct (Customer Service Standards) 2018 (and previous versions) as per obligations listed in this audit report and concluded that the licensee complies with the obligations with the exception of 1 non-compliance with a moderate effect on customers and 11 non-compliances with a minor effect on customers.</p> <p>The Compliance Reports provided to the ERA for 2016/17 and 2017/18 reported no non-compliances. The Compliance Report for 2015/16 noted minor</p>	<p>The non-compliance with moderate effect on customers is listed in table 1 the remaining 11 non-compliances with a minor effect on customers are listed in this table including this item. Action by BWC to address these recommendations is listed in tables 1 and 2.</p>	<p>Paxon can confirm in review with Business Service Manager that this has been actioned by BWC during the audit period.</p>

Resolved during the current audit period

		non- compliances noted in the previous audit and not resolved until October 2016.		
101	B2 Code of Conduct. Clause 13(4) Each bill for usage for a metered water service must contain the specified information.	Recommendation 01/2019 The water supply invoice should be amended to include the number of days of water consumption for which the bill applies.	Amend water supply invoice to include the number of days of water consumption for which the bill applies.	Paxon can confirm in review with Business Service Manager that this has been actioned by BWC during the audit period and as per the review of detailed invoice sample as part of the current audit period.
101A	B2 Code of Conduct. Clause 13(5) 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.	Recommendation 02/2019 Where consumption is charged based on estimated usage the water supply invoice should be amended to include a statement that, the basis of the estimate will be provided upon request.	Amend water supply invoice to include a statement that, the basis of the estimate will be provided upon request.	Paxon can confirm in review with Business Service Manager that this has been actioned by BWC during the audit period and as per the review of detailed invoice sample as part of the current audit period.
102	B2 Code of Conduct. Clause 12(3) 18 Nov. 2015 to Sep. 2017 Each bill must inform the customer of the specified information and where further details can be obtained	This obligation is documented in the Action Sheet – Water Compliance Reporting. The audit confirmed by detailed testing of a sample of 30 invoices across the audit period that the specified information is included on each bill with the exception of a statement that the bill can be reviewed. Clause 12 (3)(e) of the 2013 Water Services Code of Conduct (Customer Service Standards) states each bill must inform the customer that the bill can be reviewed in accordance with the	A Bill Review statement was added to bills from the June 2018 billing cycle.	Paxon can confirm in review with Business Service Manager that this has been actioned by BWC during the audit period and as per the review of detailed invoice sample as part of the current audit period.

Resolved during the current audit period

		licensee’s review procedure. A Bill Review statement was added to bills from the June 2018 billing cycle.		
102A	B2 Code of Conduct. Clause 13(6) Each bill must contain the prescribed information.	This obligation is documented in the Action Sheet – Water Compliance Reporting. The auditor confirmed by detailed testing of a sample of 30 invoices across the audit period that the specified information is included on each bill except for information relating to review of the bill. The prescribed information relating to bill review was introduced from June 2018.	A Bill Review statement was added to bills from the June 2018 billing cycle.	Paxon can confirm in review with Business Service Manager that this has been actioned by BWC during the audit period and as per the review of detailed invoice sample as part of the current audit period.
117A	B2 Code of Conduct. Clause 21, Notification of change in water service charge 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).	Recommendation 03/2019 Busselton Water should include a news item for the annual fee increases on their website and information about the annual fee increases in the newsletter accompanying the first bill subsequent to the finalisation of fee increases.	Include a news item for the annual fee increases on BWC’s website and information about the annual fee increases in the newsletter accompanying the first bill subsequent to the finalisation of fee increases.	Paxon noted that this was not actioned or resolved during the review period. Paxon has issued a recommendation number 01/2022.
133A	B2 Code of Conduct. Clause 32, No interest in Some circumstances The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances.	Recommendation 04/2019 Busselton Water should amend processes and update P12.PR04. Charging of Penalties and P12.PR021. Complaints Management procedures to ensure that interest is not charged to customers experiencing financial hardship	Amend processes and update P12.PR04. Charging of Penalties and P12.PR021. Complaints Management procedures to ensure that interest is not charged to customers experiencing financial hardship or for unresolved complaints directly related to the bill.	Paxon has noted that this has been actioned and updated as per the management comments.

Resolved during the current audit period

		or for uN/Resolved complaints directly related to the bill.		
138A	<p>B1</p> <p>Code of Conduct. Clause 37(1)(af)–(g), No reduction of flow of water in certain cases and times</p> <p>The licensee must not start a water supply restriction if the specified circumstances apply.</p>	<p>The audit confirmed this requirement is stated in the PR020 'Installation and Removal of Restriction Devices' procedure, with the exception of excluding installation of a restriction device where the customer has applied for a concession or other financial assistance to which the customer may be entitled and a decision on the application has not yet been made as required by Clause 37 (1)(g).</p> <p>BWC confirmed that no supply restrictions were put in place in the above circumstances.</p>	<p>Update PR020 'Installation and Removal of Restriction Devices'.</p>	<p>Paxon has noted that this has been actioned and updated as per the management comments.</p>
149	<p>B1</p> <p>Code of Conduct. Clause 46(5), Complaints procedure</p> <p>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.</p>	<p>Through review of website information and discussion with the Water Tariffs Officer, the audit found this obligation is being met as at the time of audit the complaints procedure was available on the website complaints page but the hyperlink was not active for the Busselton Water Complaints Procedure in the Appeals and Complaints information listed on the 'review your bill' page.</p> <p>Also, the Customer Complaints section has no reference or link to the complaints procedure.</p>	<p>Repair BWC website hyperlink to the Busselton Water Complaints Procedure in the Appeals and Complaints information listed on the 'review your bill' page.</p> <p>Include a reference or link to the complaints procedure in the Customer Complaints section.</p>	<p>Paxon has noted that this has been actioned and updated as per the management comments.</p>

Resolved during the current audit period

<p>149A</p>	<p>B3 Code of Conduct. Clause 47. Resolution of complaints 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.</p>	<p>Recommendation 05/2019 1) The P12.PR021 Complaints Management procedure should be amended to list the procedures for closing a complaint including Advising the complainant that the complaint is considered resolved; Advising the complainant they have the right to apply to the Energy and Water Ombudsman for a review of the complaint, and Providing the freecall telephone number for the Energy and Water Ombudsman. 2) Staff should be reminded to record all communication with the customer relevant to the complaint and to update the Complaints Register with sufficient details to identify all documentation, e.g. TRIM references or Aquatact notes.</p>	<p>Amend the Complaints Management procedure (P12.PR021) according to a, b & c. Record all communication with the customer relevant to the complaint and update the Complaints Register with sufficient details to identify all documentation, e.g. TRIM references or Aquatact notes. Amend current Complaints Management Procedure to include a formal post resolution process.</p>	<p>Paxon has noted that this has been actioned and updated as per the management comments.</p>
<p>153</p>	<p>B2 Code of Conduct. Clause 49(1). All Code of Conduct information to be publicly available in hardcopy and website. The licensee must make the prescribed information available on the licensee’s website and a hardcopy provided to a customer upon request at no charge.</p>	<p>Recommendation 06/2019 The document “Our Customer Commitments” on the website and in hardcopy should make reference to the fact that reductions in water flow may be made if a water service charge remains unpaid for 30 days after it becomes due.</p>	<p>Amend the document “Our Customer Commitments” on the website and in hardcopy to make reference to the fact that reductions in water flow may be made if a water service charge remains unpaid for 30 days after it becomes due.</p>	<p>Paxon has noted that this has been actioned and updated as per the management comments.</p>

Resolved during the current audit period

<p>154</p>	<p>B2 Code of Conduct. Clause 49(2). All Code of Conduct information to be publicly available in hardcopy and website The licensee must ensure that the specified information about bills may be obtained from its website.</p>	<p>As per Obligation 153</p>	<p>As per Obligation 153</p>	<p>Paxon has noted that this has been actioned and updated as per the management comments.</p>
<p>156</p>	<p>B2 Licence conditions. Clause 3.1.1, Compliance generally Subject to any modifications or exemptions granted pursuant to the Act and this licence, the licensee must comply with any applicable legislation.</p>	<p>The audit reviewed compliance with the <i>Water Services Act 2012</i>, <i>Water Services Regulations 2013</i> and the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i> and previous versions as per obligations listed in this audit report and concluded that BWC complies with the obligations apart from with the exception of 1 noncompliance with a moderate effect on customers and 11 non-compliances with a minor effect on customers.</p>	<p>The non-compliance with moderate effect on customers is listed in table 1 the remaining 11 non-compliances with a minor effect on customers are listed in this table including this item. Action by BWC to address these recommendations is listed in tables 1 and 2.</p>	<p>Paxon has noted that this has been actioned and updated as per the management comments.</p>
<p>158</p>	<p>B2 Licence conditions. Clause 5.3, Apr.-Jun. 2016, Compliance with Code of Conduct The licensee must comply with any code of conduct made by the ERA to the extent it applies to the licensee and is not inconsistent with the terms and conditions of the licence.</p>	<p>The auditor reviewed compliance with the Code of Conduct as per obligations listed in this audit report, and concluded that the licensee complies with the Code of Conduct with the exception of 1 noncompliance with a moderate effect on customers and 11 non-compliances with a minor effect on customers.</p>	<p>The non-compliance with moderate effect on customers is listed in table 1 the remaining 11 non-compliances with a minor effect on customers are listed in this table including this item. Action by BWC to address these recommendations is listed in tables 1 and 2.</p>	<p>Paxon has noted that this has been actioned and updated as per the management comments.</p>

2.6

Audit Recommendations

Obligation Under:						
No.	Water Services Act 2012 Section Number	Water Services Licence Version 10 Clause Number	Adequacy of Controls and Compliance Rating / Legislative Reference Description	Audit Priority Rating (1=high, 5=low)	Auditors Findings & Recommendations	Management Comments
117A	21	4.1.1	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).	4	<p>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.</p> <p>Recommendation 01/2022</p> <p>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.</p>	

3. ASSET MANAGEMENT REVIEW

3.1 Asset Management System Rating Scales

The asset management process and policy rating allocated to each asset management system component are set out in table below. These ratings were taken from the ERA’s document entitled: “2019 Audit and Review Guidelines - Water Licences – March 2019” and are as follows:

Rating	Description	Criteria
A	Adequately defined	<ul style="list-style-type: none"> 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; and The asset management information system(s) is adequate in relation to the assets being managed.
B	Requires some improvement	<ul style="list-style-type: none"> 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; and The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires substantial improvement	<ul style="list-style-type: none"> Processes and policies are incomplete or require substantial improvement; Processes and policies do not document the required performance of the assets; Processes and policies are considerably out of date; and The asset management information system(s) requires substantial improvements (taking into consideration the assets being managed).
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented; and The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

The asset management performance ratings allocated to each asset management system component are set out in Table 14 below. These ratings were taken from the ERA’s document entitled: “2019 Audit and Review Guidelines - Water Licences – March 2019” and are as follows:

Rating	Description	Criteria
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance; and Process effectiveness is regularly assessed, and corrective action taken where necessary.
2	Improvement required	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level; Process effectiveness reviews are not performed regularly enough; and Recommended process improvements are not implemented.
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires substantial improvement to meet the required level; Process effectiveness reviews are performed irregularly, or not at all; and Recommended process improvements are not implemented.
4	Serious action required	<ul style="list-style-type: none"> Process is not performed, or the performance is so poor the process is considered to be ineffective.

3.2 Asset Management System: Ratings Summary

The ratings for the asset management processes, including their effectiveness criteria, are indicated in below:

Asset Management System	Review Priority Rating	Process and Policy Rating				Performance Rating			
		Adequately Defined	Requires some Improvement	Requires Substantial Improvement	Inadequate	Performing Effectively	Improvement Required	Corrective Action Required	Serious Action Required
Processes and Effectiveness Criteria	(1 = High to 5 = Low)	A	B	C	D	1	2	3	4
Asset Planning									
Asset Management Plan covers key requirements;	4	√				√			
Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning;	4	√				√			
Service levels are defined;	5	√				√			
Non-asset options are considered;	5	√				√			
Life cycle costs of owning and operating the assets are assessed;	5	√				√			
Funding options are evaluated;	5	√				√			
Costs are justified, and cost drivers identified;	5	√				√			
Likelihood and consequences of asset failure are predicted; and	5	√				√			
Plans are regularly reviewed and updated.	5	√				√			
Asset Creation and Acquisition									
Full project evaluations are undertaken for new assets including comparative estimates of non-asset solutions;	4	√				√			

Asset Management System	Review Priority Rating	Process and Policy Rating	Performance Rating
Evaluations include all lifecycle costs;	4	√	√
Projects reflect sound engineering and business decisions;	4	√	√
Commissioning tests are documented and completed; and	5	√	√
On-going legal/environmental/safety obligations of the asset owner are assigned and understood.	5	√	√
Asset Disposal			
Under performing and underutilised assets are identified as part of a regular systematic review process;	4	√	√
The reasons for underutilisation or poor performance are critically examined and corrective action or disposal undertaken;	4	√	√
Disposal alternatives are evaluated; and	5	√	√
There is a replacement strategy for assets.	5	√	√
Environmental Analysis			
Opportunities and threats in the system are assessed;	4	√	√
Performance standards (availability of service, capacity, continuity, emergency response etc.) are measured and achieved;	2	√	√
Compliance with statutory and regulatory requirements; and	2	√	√
Service standards (customer service levels etc.) are measured and achieved.	4	√	√
Asset Operations			
Operational procedures and policies are documented and linked to service levels required;	2	√	√

Asset Management System	Review Priority Rating	Process and Policy Rating	Performance Rating
Risk management is applied to prioritise operations tasks;	2	√	√
Assets are documented in an asset register including asset type, location, material, plans of components and assessment of assets physical/structural condition and accounting data;	4	√	√
Operational costs are measured and monitored; and	2	√	√
Staff resources are adequate, and staff receive training commensurate with their responsibilities.	4	√	√
Asset Maintenance			
Maintenance policies and procedures are documented and linked to service levels required;	4	√	√
Regular inspections are undertaken of asset performance and condition;	4	√	√
Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule;	4	√	√
Failures are analysed, and operation/maintenance plans are adjusted where necessary;	4	√	√
Risk management is applied to prioritise maintenance tasks; and	4	√	√
Maintenance costs are measured and monitored.	4	√	√
Asset Management Information System			
Adequate system documentation for users and IT operators;	2	√	√
Input controls include appropriate verification and validation of data entered into the system;	2	√	√
Security access controls appear adequate, such as passwords;	4	√	√

Asset Management System	Review Priority Rating	Process and Policy Rating	Performance Rating
Physical security access controls appear adequate;	2	√	√
Data back-up procedures appear adequate and back-ups are tested;	2	√	√
Key computations related to Licensee performance reporting are materially accurate;	4	√	√
Management reports appear adequate for the Licensee to monitor licence obligations; and	4	√	√
Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation.	4	√	√
Risk Management			
Risk management policies and procedures exist and are being applied to minimise internal and external risk associated with the asset management system;	2	√	√
Risks are documented in a risk register and treatment plans are actioned and monitored; and	2	√	√
The probability and consequences of asset failure are regularly assessed.	4	√	√
Contingency Planning			
Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.	4	√	√
Financial Planning			
The financial plan states the financial objectives and identifies strategies and actions to achieve those;	4	√	√
The financial plan identifies the source of funds for capital expenditure and recurrent costs;	4	√	√
The financial plan provides projections of operating statements (profit and loss) and	2	√	√

Asset Management System	Review Priority Rating	Process and Policy Rating	Performance Rating
statements of financial position (balance sheets);			
The financial plan provides firm predictions of income for the next five years and reasonable indicative predictions beyond this period;	2	√	√
The financial plan provides for the operation, maintenance, administration, and capital expenditure requirements of the services; and	2	√	√
Significant variances in actual/ budget income and expenses are identified and corrective action taken where necessary.	2	√	√
Capital Expenditure Planning			
There is a capital expenditure plan that covers issues to be addressed, actions proposed, responsibilities and dates;	2	√	√
The plan provides reasons for capital expenditure and timing of expenditure;	2	√	√
The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan; and	4	√	√
There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned.	4	√	√
Review of Asset Management System			
A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current; and	4	√	√
Independent reviews (e.g., internal audit) are performed of the asset management system.	4	√	√

3.3 Review Observations and Recommendations

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1	Asset Planning	4	<p><u>Effectiveness Criterion:</u> Asset Management Plan covers key requirements.</p> <p><u>Observations:</u> BWC's documentation and implementation of its planning processes adequately addresses the key aspects of the ongoing operation, maintenance and renewal of its assets.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning.</p> <p><u>Observations:</u> BWC conducts a rigorous annual asset planning program which encompasses all areas of BWC operations including reviews of :</p> <ul style="list-style-type: none"> • Annual demand patterns • Capacity of the asset system • Environmental requirements • Town Planning developments • Average and peak demand predictions for near (four years) medium (five to ten years) and long term (ten to thirty years) • Current and projected system growth • Life and replacement years for existing. • Capital Plan (future asset requirements and cost estimates) . • Finance options <p>The outcome of the above reviews is the preparation of each financial year's Strategic Asset Plan (SAP), Capital Expenditure, Financial plans and budget.</p> <p>The above procedures, level of investigation and timing are outlined in BWC's procedure documents P6 - "Strategy and Planning" and P16 - "Asset Management". Development of Asset Management section of the 2021/22 SAP was demonstrated for Reviewer.</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p>Details of capital expenditure and system upgrade proposals were reviewed in BWC's annual reports for the 2019/20, 2020/21 and 2021/22 financial years.</p> <p>Reviewer was provided with copies of the 2021/22 SAP and its submission to Treasury for review and submission to the Minister for Water for budget approval.</p> <p>BWC's approach and planning processes above are considered excellent</p>		
		5	<p><u>Effectiveness Criterion:</u> Service levels are defined.</p> <p><u>Observations:</u> Service levels are set out in BWC's website (Busseltonwater .wa.gov / Customers) and in BWC's <i>Asset Management Framework</i> document at Item 6.14 – Operational Planning – Levels of Service,</p>	A	1
		5	<p><u>Effectiveness Criterion:</u> Non-asset options are considered.</p> <p><u>Observations:</u> Non asset options considered include refurbishment, process variations, demand control etc where appropriate and likely to allow retention of standards, and costs or extend the life of an asset. .</p>	A	1
		5	<p><u>Effectiveness Criterion:</u> Life cycle costs of owning and operating the assets are assessed.</p> <p><u>Observations:</u> The age, condition, repair jobs history and costs are listed for all assets in <i>Confirm</i> The replacement of assets at useful life end is included in the annual SAP - with cost estimates. Life cycle costs of owning and operating assets are assessed in evaluating competing asset options and deciding if ageing assets should be replaced, repaired, or continued in service. These factors are addressed in the annual SAP and ad-hoc investigations of asset failure.</p>	A	1
		5	<p><u>Effectiveness Criterion:</u> Funding options are evaluated.</p>		

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p><u>Observations:</u></p> <p>Funding options are evaluated in preparation of each annual SAP. Finance sources include Revenue, the Capital Reserve and borrowing from the WA Treasury Corporation – which is subject to a nominated maximum amount annually. Leasing is an option in certain instances.</p> <p>Reviewer noted funding options adopted in BWC's Annual Reports for 2019/20, 2220/21 and 2021/22.</p>	A	1
		5	<p><u>Effectiveness Criterion:</u></p> <p>Costs are justified, and cost drivers identified.</p> <p><u>Observations:</u></p> <p>BWC's Procedures P6 - "Strategy and Planning" and P16 - "Asset Management" set out the accuracy of cost estimation required for the assessing the progressive development of options for SAP funding. Estimates are generated from escalated previous costs, contractor /supplier advice and consultant's estimates.</p>	A	1
		2	<p><u>Effectiveness Criterion:</u></p> <p>Likelihood and consequences of asset failure are predicted.</p> <p><u>Observations:</u></p> <p>The likelihood and consequences of asset failure are set out in <i>Procedures</i> document P3.PRO 1 and are identified from each asset's individual inherent and residual risks in the <i>Risk Register</i></p>	A	1
		5	<p><u>Effectiveness Criterion:</u></p> <p>Plans are regularly reviewed and updated.</p> <p><u>Observations:</u></p> <p>As noted above, plans are evaluated and updated during development of each year's SAP. Reviewer noted proposals to improve / replace existing assets, procedures, software and processes in the 2020/2022 SAP</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
2	Asset Creation and Acquisition	4	<p><u>Effectiveness Criterion:</u> Full project evaluations are undertaken for new assets including comparative estimates of non-asset solutions.</p> <p><u>Observations:</u> Investigations relating to identification of system upgrade requirements and available asset solutions - including do nothing, process variation, asset replacement and associated cost/benefit and finance approval submissions for a proposed acquisition are outlined in PR16.PRO3.to PRO7.</p> <p>A need for possible new assets is identified by operations staff, routine condition / performance assessments, or breakdown. The Manager Operations arranges for available asset and/ or non-asset options to be investigated internally or by consultants.</p> <p>Recommendations are submitted to the Senior Executive Group, Managing Director, or the Board (as appropriate) for approval to proceed.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Evaluations include all lifecycle costs.</p> <p><u>Observations:</u> Life cycle costs of assets - including cost of acquisitions, ongoing operations, maintenance, replacement/ repairs etc are considered in conjunction with other options, including process changes, demand control, asset refurbishment.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Projects reflect sound engineering and business decisions.</p> <p><u>Observations:</u> Review of the documented procedures and discussion of acquisition investigations indicate a significant level of engineering input to assessment of options, specification of quality and performance requirements in tender documents and business decisions.</p>	A	1
		5	<p><u>Effectiveness Criterion:</u> Commissioning Tests are documented and implemented.</p> <p><u>Observations:</u></p>		

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p>Reviewer was advised that project tender / contract documents prepared for BWC by consultants include requirements for commissioning tests. Standards Association of Australia (SAA) General Conditions of Contract - which are included in contract documents, refer to testing/commissioning.</p> <p>Reviewer understands that individual assets purchased directly for a specific performance requirement are tested for compliance. BWC should include a requirement for appropriate testing/ commissioning (for all new assets) in the AMP.</p>	B	2
		5	<p><u>Effectiveness Criterion:</u> On-going legal/environmental/safety obligations of the asset by are assigned and understood.</p> <p><u>Observations:</u> Procedure documents require consideration of legal, environmental and safety obligations and assigning of responsibility for the acquired assets to specific staff or departments of BWC.</p> <p>Acquisition of assets and spares are the responsibility of the Supply Officer, who monitors the register of spares held in store and orders replacements as required. Spares are not included in the asset register until requisitioned from the store and installed in the operating system.</p> <p>Preparation of specifications and tender documentation, contract administration and construction for projects is the responsibility of the Operations Manager.</p>	A	1
3	Asset Disposal	4	<p><u>Effectiveness Criterion:</u> Under performing and under-utilised assets are identified as part of a regular systematic review process.</p> <p><u>Observations:</u> BWC 's procedure P16 PRO 15 sets our BWC's requirements for disposal of assets which have reached their expected effective life, are underperforming, cannot be refurbished or repaired. The condition, performance, age and repair history of asset is addressed annually during investigations for the Strategic Asset Plan</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken.</p> <p><u>Observations:</u></p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			Underperformance, poor condition, approaching or achieving end of life etc are considered during annual condition assessments, or following breakdown. Recommendations for disposal of assets are appended to all financial forecast submissions.		
		5	<p><u>Effectiveness Criterion:</u> Disposal alternatives are evaluated.</p> <p><u>Observations:</u> The procedure requires that all options for disposal are documented including financial and practical aspects of sale, hiring, gifting, or retention for spares. The disposal of assets is the responsibility of the Supply Officer</p>	A	1
		5	<p><u>Effectiveness Criterion:</u> There is a replacement strategy for assets.</p> <p><u>Observations:</u> Planning for the replacement of assets are included in the rolling four, ten and thirty year horizons of the capital expenditure and financial plans of the annual SAP.</p>	A	1
4	Environmental Analysis	4	<p><u>Effectiveness Criterion:</u> Opportunities and threats in the system are assessed.</p> <p><u>Observations:</u> Section 3.3 of the annual Strategic Asset Plan. (SAP) specifically addresses Gaps, Strengths and Risks. Opportunities and threats to the system are also addressed during the annual review of business practises - in accordance with Procedure Manual item P14.PRO2.</p>	A	1
		2	<p><u>Effectiveness Criterion:</u> Performance standards (availability of service, capacity, continuity, emergency response etc.) are measured and achieved.</p> <p><u>Observations:</u> Performance standards are set out in the Asset Management documentation, ERA Water Licence, The Department of Water and Environmental Regulation (Groundwater Licence) and the Memorandum of Understanding between BWC and the Department of Health.</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			Review of quarterly and annual reports to these Authorities, together with statements in Annual reports for each of the three years of review, indicate full compliance with all standards.		
		2	<p><u>Effectiveness Criterion:</u> Compliance with statutory and regulatory requirements.</p> <p><u>Observations:</u> As stated above all regulatory requirements were met for the three years of this review period.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Service standards (customer service levels etc.) are measured and achieved.</p> <p><u>Observations:</u> Customer service levels are continuously monitored and recorded; and summary reports submitted to management monthly. All customer services were within required levels for each of the three years of this review</p>	A	1
5	Asset Operations	2	<p><u>Effectiveness Criterion:</u> Operational procedures and policies are documented and linked to service levels required.</p> <p><u>Observations:</u> BWC's Policy, Procedure and Works Instruction Manuals ensure compliance with the above criteria. Ongoing performance monitoring and monthly reporting ensure compliance and a practical link with service level requirements.</p>	A	1
		2	<p><u>Effectiveness Criterion:</u> Risk management is applied to prioritise operations tasks.</p> <p><u>Observations:</u> Risk analysis is a critical element of all asset planning, operations, and maintenance and is specifically addressed in all work instructions. Work instructions for maintenance and operational procedures include a priority level advice.</p>	A	1
		4	<u>Effectiveness Criterion:</u>		

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p>Assets are documented in an asset register including asset type, location, material, plans of components and assessment of assets physical/structural condition and accounting data.</p> <p><u>Observations:</u></p> <p>All assets are documented in the asset register contained in the Asset Management package <i>Confirm</i>. Information contained in the register includes the above together with the job (repair) history. Links - via <i>Content</i> software, allow access to associated costs and specific reports associated with performance/ repair for each asset.</p>	A	1
		2	<p><u>Effectiveness Criterion:</u></p> <p>Operational costs are measured and monitored.</p> <p><u>Observations:</u></p> <p>Operational costs are compiled from electronic time sheets submitted by staff, the cost of spares etc sourced from stores, together with claims against purchase orders issued to suppliers and contractors.</p> <p>Monthly reports of actual costs against budget are prepared by the financial section and submitted to management for approval / action as required.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u></p> <p>Staff resources are adequate, and staff receive training commensurate with their responsibilities.</p> <p><u>Observations:</u></p> <p>Staff levels are considered adequate.</p> <p>The Human Resources Officer (HRO) manages all training and maintains a register of staff training and qualifications. Appropriate training schedules are prepared following annual performance assessments for staff members. Schedules are submitted, together with cost estimates, for management approval. Once approved, the HRO arranges the training, dates, staff advice etc, and records completion.</p> <p>Training may be undertaken in-house or in the case of specific software such as <i>Confirm</i> or <i>Synergy</i>, is provided offsite by software owners or specially trained BWC staff.</p>	A	1
6		4	<p><u>Effectiveness Criterion:</u></p>		

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
	Asset Maintenance		<p>Maintenance policies and procedures are documented and linked to service levels required.</p> <p><u>Observations:</u></p> <p>Asset Maintenance policies are set out in BWC’s Asset Management Strategy document. Maintenance schedules, including procedures, timing, priority, etc are mounted (by BWC’s Asset Management section) on BWC’s <i>Confirm</i> Asset Management software package. <i>Confirm</i> automatically generates electronic maintenance work orders for cyclic maintenance which appear on staff member’s tablets.</p> <p>The staff member responsible for given maintenance record completion and any comments directly to <i>Confirm</i> from their tablets.</p> <p>Maintenance work orders can also be generated manually for ad hoc maintenance jobs. eg when maintenance is undertaken in response to an emergency call out, the attending staff member provides a paper copy of the, work performed to BWC’s Asset Management section - raises a work order in <i>Confirm</i> and simultaneously logs the work as completed.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u></p> <p>Regular inspections are undertaken of asset performance and condition.</p> <p><u>Observations:</u></p> <p>Maintenance plans loaded in <i>Confirm</i> provide details of requirements for inspection and frequency. Maintenance work orders automatically generated from <i>Confirm</i> set out the frequency, procedure, tools safety equipment etc required for maintenance of assets. The condition of all assets is assessed annually and recorded in <i>Confirm</i>. Procedures for assessment of all assets is thoroughly described in BWC’s document “Assessing Asset Condition”</p> <p>Performance is assessed and recorded against specific requirements, e.g, those nominated by the manufacturer (power consumed, product delivered, operating pressure etc), or performance nominated by BWC in tender / contract documents.</p> <p>The condition and performance of exposed reticulation fittings – valve, hydrants and measuring devices is also undertaken annually.</p> <p>The condition of the reticulation pipework and buried valves is assessed on age, material, repair history and condition noted during repair.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u></p>		

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p>Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.</p> <p><u>Observations:</u></p> <p>Maintenance and condition inspection schedules for all assets are mounted in <i>Confirm</i>, which is managed by BWC’s Asset Management staff.</p> <p>AM staff generates condition assessment work orders from <i>Confirm</i> (for individual or groups of assets) which are transmitted electronically to the tablets of staff members responsible for the work. Work orders state the asset(s) to be assessed, together with the time frame for the work.</p> <p><i>Confirm</i> is programmed to generate work orders cyclically ie. weekly, fortnightly, monthly, annually etc, as required by each asset/group</p> <p>Staff undertake the work order in accordance with specific instructions for each asset detailed in BWC,s “<i>Operations Work Instruction Manual</i>” document. For each asset /asset type, the document provides, information on safety equipment, tools and spare parts required, power isolation, together with the sequence for dis-mantling (if required) and the basis if condition assessment.</p> <p>On completion of the work order, the staff member electronically lodges work complete to <i>Confirm</i> via his tablet – together with the condition assessment and any related comments.</p> <p>AM staff note and query work orders not completed.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u></p> <p>Failures are analysed, and operation/maintenance plans are adjusted where necessary.</p> <p><u>Observations:</u></p> <p>Reports on failures, causes and associated observations are examined. Options for operational changes, maintenance type / intervals or asset type are canvassed and implemented as necessary.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u></p> <p>Risk management is applied to prioritise maintenance tasks.</p> <p><u>Observations:</u></p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			Risk management and other factors are applied to prioritize maintenance tasks. A maintenance priority tag is assigned to each maintenance work order.		
		4	<p><u>Effectiveness Criterion:</u> Maintenance costs are measured and monitored.</p> <p><u>Observations:</u> Maintenance costs are compiled from electronic staff time sheets, claims against purchase orders by suppliers and contractors. Monthly reports of actual costs against budget are prepared by the financial section and submitted to management for approval / action as required.</p>	A	1
7	Asset Management Information System	2	<p><u>Effectiveness Criterion:</u> Adequate system documentation for users and IT operators.</p> <p><u>Observations:</u> Standard software in use includes the Microsoft products Word, Excel. Staff appointees usually have a basic knowledge of these programs - although in-house training can be provided if requested.</p> <p>The main software packages used in association with management of assets are:</p> <ul style="list-style-type: none"> • <i>Aquarate</i> – a billing system that includes customer and meter information. • <i>Synergy Soft Financial System</i> - including invoicing etc. • <i>Synergy Soft Risk Management System</i>. • SCADA – which provides remote operational monitoring and control of plant systems including storage and logging of operational data. • <i>Brightly’s Confirm, Confirm Connect and Workzone</i> – which is used to manage <p>BWC’s asset management and work order systems, for maintenance, operations and inspections.</p> <ul style="list-style-type: none"> • <i>ESRI’s Arc GIS -A</i> mapping platform which allows BWC to load plans of water mains, valves, hydrants and other fittings onto background maps of streets and lots in the BWC licence area. These can be displayed on office and field staff PC’s, tablets and phones. The system provides a prompt indication of assets present in a given location and an indication of valves to be closed and properties affected in the event of a line burst or similar emergency. 	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p>Training is undertaken in-house or in the case of specific software such as <i>Confirm</i> or <i>Synergy</i>, is provided offsite by software providers or on-site by BWC staff specially trained in use of the software.</p> <p>Reviewer noted instructions for <i>Confirm</i>, <i>ARC GIS</i>, and <i>SCADA</i> in procedure documentation.</p>		
		2	<p><u>Effectiveness Criterion:</u> Input controls include appropriate verification and validation of data entered into the system.</p> <p><u>Observations:</u> Input controls include spot checking and validation checking of entries by other staff. eg noting incomplete work orders. Also, significant discrepancies between new and historical data are highlighted by the software and checked/ verified.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Security access controls appear adequate, such as passwords.</p> <p><u>Observations:</u> Access to specific software is limited to staff whose duties necessitate use of the software. Access to the software is by password and is considered adequate.</p>	A	1
		2	<p><u>Effectiveness Criterion:</u> Physical security access controls appear adequate.</p> <p><u>Observations:</u> The main server and its storage unit are located in a locked room in the head office building. The operations server and storage are located in a locked room at Treatment Plant No.2. Access to both locked rooms is by a key-pad operated door lock. Three head office staff have access to the head office computer rooms and two treatment staff have access to the room at Treatment Plant No.2 .</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			Both the head office and treatment plant sites and buildings are locked outside working hours and both have visual surveillance and alarm systems.		
		2	<p><u>Effectiveness Criterion:</u> Data back-up procedures appear suitable and back-ups are tested.</p> <p><u>Observations:</u> Data from both the main and operations servers is backed up to their respective storages hourly. Storages data is validated and are further backed up to cloud daily. The cloud storage provider also validates the data prior to back-up to the cloud.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Computations for Licensee performance reporting are accurate.</p> <p><u>Observations:</u> Performance reports reviewed indicated agreement between the content of the reports and the raw data on which they were based.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Management reports appear adequate for the Licensee to monitor licence obligations.</p> <p><u>Observations:</u> Management reports on all aspects of operations, testing, performance, works progress etc are used to monitor BWC's Water Licence and DOW Groundwater obligations and those associated with its MOU with the Department of Health Quarterly and annual reports are provided to ERA, DWER and DOH detailing BWC's performance regarding their obligations to each Authority</p>	A	1
		4	<p><u>Effectiveness Criterion:</u></p>		

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p>Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation.</p> <p><u>Observations:</u></p> <p>Access of unauthorised persons to buildings housing the computer systems hardware is prevented by the buildings and sites being locked outside normal working hours and protected by visual and transferred audible alarms.</p> <p>Within the head office buildings and Treatment Plant No. 2 site, unauthorised access to information or data is prevented by password access to PCs within the BWC buildings in which they are housed.</p>	A	1
8	Risk Management	2	<p><u>Effectiveness Criterion:</u></p> <p>Risk management policies and procedures exist and are applied to minimise internal and external risk associated with the asset management system.</p> <p><u>Observations:</u></p> <p>BWC's Risk Management complies with AS/NZ ISO 31000:2009.</p> <p>BWC's Procedure P3 PRO 1 states that the assessment of risk and its management shall be applied to all areas of business, operations etc and that a review be conducted bi-annually and reported to the Senior Executive Group (SEG). In March each year, a review report is submitted to the Board.</p> <p>Reviewer viewed the March 2022 report.</p>	A	1
		2	<p><u>Effectiveness Criterion:</u></p> <p>Risks are documented in a risk register and treatment plans are actioned and monitored.</p> <p><u>Observations:</u></p> <p>During reviews, inherent risks are assessed and listed for areas likely to be affected. (eg, customers, reputation, operations, financial, safety etc), together with the residual risk resulting from the current risk reducing measures (monitoring, maintenance, testing etc) being undertaken for each area.</p> <p>For areas where the residual risk is unacceptable, an action sheet is prepared (and appended to each review report) recommending changes to current risk reducing practises and a time frame for their implementation</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
		4	<p><u>Effectiveness Criterion:</u> The probability and consequences of asset failure are regularly assessed.</p> <p><u>Observations:</u> The inherent and residual risk occurrence probability and consequences (for assets, business, operational/ administrative or other failures) are assessed bi-annually in accordance with procedures set out in BWC Procedure P3 PRO1. As stated above changes to current risk reducing practises are recommended, together with a time frame for their implementation.</p>	A	1
9	Contingency Planning	4	<p><u>Effectiveness Criterion:</u> Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</p> <p><u>Observations:</u> BWC contingency plans are addressed in a series of emergency response plans as follows:</p> <ul style="list-style-type: none"> • Network Disaster Recovery Plan (which addresses the Information Technology system) • Records Management Disaster Recovery Plan. • Administration Emergency Response Plan • Water Crisis Communication Plan • Water Quality Incident Response Plan • Combined Emergency Response Plan Plants 1, 2 & 3 • Business Continuity Management Plan and <p>The plans nominate the roles and responsibility of BWC staff for response to various emergency situations. actions required by the failure type. The plans provide details of BWC management, stakeholders and authorities to be advised of the emergency. Procedures for affecting replacements and repairs are provided in Operations Work Instructions. Memorandum of Understand between Busselton Water and the Department of Health includes Binding Protocols relevant to incident response.</p> <p>Water quality mock emergency scenarios are tested internally at an annual meeting of selected BWC staff with Department of Health representatives. Attendees and management receive minutes of the meetings, including suggested amendments for</p>	A	2

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p>incorporation in response plans. Reviewer noted minutes and amendments to various plans. The exercise usually involves the water distribution network operations e.g isolating the incident area, flushing ops, pipe repair ops. During the review period, a mock event exercise was held which was a flood event that impacted the distribution network. This outcome of this exercise resulted in detailed actions and responses.</p> <p>Emergency evacuation drills are also undertaken in association with the Department of Fire and Emergency Services.</p> <p>There appear to be no separate scenario tests associated with the water supply distribution network,</p>		
10	Financial Planning	4	<p>Effectiveness Criterion: The financial plan states the financial objectives and identifies strategies and actions to achieve those.</p> <p><u>Observations</u> BWC's Budget schedule spreadsheets for 2021/23 were made available to reviewer. The schedules incorporate rolling ten-year estimates of income and expenditure for the initial four years (to align with government budget planning) and the subsequent six year to year ten. The schedules also incorporate the previous two year's forecast and actual budget expenditure.</p> <p>The spreadsheets for each year include workbooks for sixteen expenditure areas - including Water Production, Members, Administration, Infrastructure, Operations, Plant and Plant Operations, Miscellaneous, Stores, Salaries, Transfer to Reserves, Finance and Borrowing, Reserves and Restricted Assets, Non-cash Transactions and Reserves.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> The financial plan identifies the source of funds for capital expenditure and recurrent costs.</p> <p><u>Observations:</u> 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.</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
		2	<p><u>Effectiveness Criterion:</u> The financial plan provides projections of operating statements (profit and loss) and statements of financial position (balance sheets).</p> <p><u>Observations:</u> Profit and loss and balance sheet information is provided in the above budget schedules</p>	A	1
		2	<p><u>Effectiveness Criterion:</u> The financial plan provides firm predictions of income for the next five years and reasonable indicative predictions beyond this period.</p> <p><u>Observations:</u> 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</p>	A	1
		2	<p><u>Effectiveness Criterion:</u> The financial plan provides for the operation, maintenance, administration, and capital expenditure requirements of the services.</p> <p><u>Observations:</u> As stated above the plan provides for operation, maintenance, administration and capital expenditure for the forthcoming ten years</p>	A	1
		2	<p><u>Effectiveness Criterion:</u> Large variances in actual/ budget income and expenses are identified and corrective action taken where necessary.</p> <p><u>Observations:</u> 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.</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
11	Capital Expenditure Planning	2	<p><u>Effectiveness Criterion:</u> There is a capital expenditure plan that covers issues to be addressed, actions proposed, responsibilities and dates.</p> <p><u>Observations:</u> BWC's Procedure P16 sets out the sequence of investigations to be taken to identify the necessity for capital works, together with options available, timing, cost and financing. Reporting and approval procedure to BWC management and Board are also outlined.</p>	A	1
		2	<p><u>Effectiveness Criterion:</u> The plan provides reasons for capital expenditure and timing of expenditure.</p> <p><u>Observations:</u> Reasons for each capital expenditure item are included in the above reports. Recommendations are provided for inclusion of items in capital expenditure together with priority in the forthcoming 1 to 4 years and subsequent 5 to 10 years and beyond.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan.</p> <p><u>Observations:</u> Investigations leading to formation of each capital expenditure plan include the annual assessment and reporting of condition of assets, their performance and age. – which is recorded in <i>Confirm</i>. For assets at or approaching their useful life a decision it made to either continue their maintenance, or to include them in the capital expenditure program.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned.</p>	A	1

No.	Asset Management Process	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
			<p><u>Observations:</u> BWC's procedures and Government requirements ensure capital expenditure plans are updated annually.</p>		
12	Review of the Asset Management System	4	<p><u>Effectiveness Criterion:</u> A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.</p> <p><u>Observations:</u> Elements of BWC's Procedures Manual are reviewed annually .by staff responsible for the various activities associated with BWC's business. In addition, reviews are undertaken on an ad hoc basis where repair, maintenance or similar activities indicate that existing procedure requires amendment. A copy of the current Asset Management System review was provided for Reviewer. Asset procedures examined were essentially current and contained tables indicating the date of preceding reviews and comment on resulting amendments.</p>	A	1
		4	<p><u>Effectiveness Criterion:</u> Independent reviews (e.g., internal audit) are performed of the asset management system.</p> <p><u>Observations:</u> An independent specialist appointed by ERA undertakes a review at three yearly intervals.</p>	A	1

3.4 Current Review: Asset Management System Deficiencies and Recommendations

Current Review: Asset Management System Deficiencies and Recommendations			
A. Resolved During Current Review Period			
Reference	Rating	Date Resolved	Reviewer's Comments
	Asset Management Process and Effectiveness Criterion	BWC Action Taken	
	Details of Deficiency		
This table has no content			

APPENDIX A

KEY DOCUMENTS, LICENCEE'S REPRESENTATIVES, AUDIT REVIEW TEAM

Key Documents and Other Information Reviewed

Details of key documents and other information sources examined during the Review are as follows:

- ERA: 2019 Audit and Review Guidelines - Water Licences – March 2019
- Quantum Assurance: Audit Report – Performance Audit and Asset Management Review –dated June 2019;
- ERA: Water Services Licence – BW – WL3, version 8, 1 July 2016; to 30th April 2020
- ERA: Water Services Licence – BW – WL3, version 9, 1 May 2020to 1st June 2021
- ERA: Water Services Licence – BW – WL3, version 10, 2 June 2021 to present
- Busselton Water - Annual Reports 2018/2019, 2019/2020 and 2020/21,
- Busselton Water - Organisation Chart 2021
- Memorandum of Understanding Between Department of Health and Busselton Water - Drinking Water, 2019
- Busselton Water - Drinking Water Quality Management Plan 2021
- Busselton Water - Draft Situation Report to Dept. of Health
- Busselton Water – Budget Schedules 2022/23 – Approved by Treasury
- Busselton Water – Complaints Register
- Busselton Water - Policy Manual 2021
- Busselton Water - Procedure Manual
- Busselton Water - Operations Works Instruction Manual
- Busselton Water – Annual Asset Capacity Review 2019
- Busselton Water – Annual System Growth Review
- Busselton Water – Annual Demand Pattern Review2020
- Busselton Water - Draft Land Development Standards
- Busselton Water - Strategic Asset Plan – 2021/22 to 2031/32
- Busselton Water – Asset Management Framework – 2022
- Busselton Water – Risk Management – Report to Board 2022
- Busselton Water – Risk Assessment Tables
- Busselton Water – Training Development Plan 2021/22
- Busselton Water – Assessing Asset Conditions
- Busselton Water – ERA Compliance Reports – 2018/19 to 2021/22
- Busselton Water – ERA Data Report sheets - 2020
- Busselton Water - Network Disaster Recovery Plan 2021
- Busselton Water – Rates Notices, Brochures and ancillary information 20, 21, 22, 23
- Busselton Water - Administration - Emergency Response Plan
- Busselton Water - Water Crisis Communication Plan
- Busselton Water - Water Quality Incident Response Plans
- Busselton Water - Operational Incident Form

- Busselton Water – Water Sampling log sheets & Schedules 2019 to 2022
- Busselton Water – Weekly in-house chemical testing 2020 to August 2022
- Busselton Water – Water Quality Results - Operational
- Busselton Water – Water Quality Mock Event Minutes 2022
- Busselton Water – Typical Confirm Asset Register sheet
- Eurofins ARL Lab reports -August 2022
- DOH – Materials, Products and Substances in Drinking Water Report
- McCoy Engineering – Reports on Treatment Plant Structures - 2019 to 2022
- Arc GIC – Online operating instructions

Licencee’s Representative

BWC Representative	Position
Chris Elliot	Managing Director
Murray Johnsen	General Manager - Operations
Chris Temple	Operations Engineer
Keith Mungham	Asset Risk Manager
Greg Harris	Manager - Finance
Jenny Mathies	Administrator -Operations
Andrew Thompson	Supervisor – Water Production
Katie Jolley	Manager – Customer Service
Shanice Meredith	Senior Business Service Office
Tobey Howes	IT Support
Craig Francis	Supply Officer
Carleen Gale	Human Resources Officer

Audit and Review Team & Hours

Name & Position	Budget Hours
Cameron Palassis, Executive Director	50
Ian Ekins, Associate Director	40
Barry Robbins, Barry Robbins Engineering & Project Management	50
Total	140

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