

Post Audit Implementation Plan

Recommendation reference (no/year)	Non-compliance/ Controls Improvement (Rating/Licence obligation reference number & licence obligation/ Details of non-compliance or inadequacy of controls)
1/2023	<p><b>B3</b></p> <p><u>4. Environmental Analysis</u></p> <p><i>4.2 Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved</i></p> <p>The following aspects of Kleenheat’s emergency preparedness activities require strengthening:</p> <ul style="list-style-type: none"> <li>• The Internal Safety Case Audit conducted in March 2023 reported that FY 2023 (to date) Emergency Response (ER) drills were overdue. We confirmed that overdue ER drills were subsequently actioned</li> <li>• ER drills are associated with site assets, site personnel and community safety matters however they are not thorough enough to include local authorities such as Fire Brigade, Medical Centres, Traffic Management, etc. (other than only Kleenheat contractors).</li> </ul>
2/2023	<p><b>B3</b></p> <p><u>5. Asset Operations</u></p> <p><i>5.6 Staff resources are adequate and staff receive training commensurate with their responsibilities</i></p> <p>The following matters indicate an exposure in Kleenheat’s training requirements and records:</p> <ul style="list-style-type: none"> <li>• Practical competency assessments for the more critical maintenance tasks have been completed by the Maintenance &amp; Training Specialist and the results of the practical assessments have been manually documented, however at the time of our review, those results had not been fully captured in Kleenheat’s system/electronic records. In addition, Kleenheat had not yet fully developed a maintenance training package that addresses the more routine maintenance tasks</li> <li>• An Internal Safety Case audit undertaken in March 2023 reported that Kleenheat had not completed a review of its current competency compliance matrix to ensure all contractors achieve full compliance with mandatory competency training activities. Kleenheat did not meet its Training KPI metrics in FY21 and FY22, in part due to the recent development of a new automated system, which Kleenheat has recognised</li> <li>• While contractor staff were aware of their emergency management obligations and a selection of emergency response scenarios, they were not fully familiar with all specific details of Kleenheat’s Emergency Management Plan.</li> </ul>

3/2023

**B3**

6. Asset Maintenance

*6.3 Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule The following elements of Kleenheat's maintenance plans and activity require corrective action:*

- The Maintenance Planner had not been scheduling maintenance tasks and updating Oracle eAM per the stated requirements of Kleenheat's Distribution Network Maintenance Process Flow Chart
- An Internal Safety Case Audit Report dated March 2023 reported that a selection of condition monitoring activities were not completed as scheduled during the audit period. It also identified the need for Kleenheat to develop a process to ensure overdue PM's are escalated to ensure their completion
- Kleenheat has acknowledged that its current systems do not perform the function of Work Order management as intended, and is seeking to implement an eAM system that can provide seamless Work Order management.

Auditor's recommendation

Kleenheat add further rigor to its emergency preparedness by:

- (a) Assigning priority to ER drills, particularly where there is a recent history of delays
- (b) Expand its ER drills to include local authorities such as Fire Brigade, Medical Centres, Traffic Management, etc. (other than only Kleenheat contractors) as outlined in the emergency management plans for Margaret River and Albany networks.

Kleenheat strengthen its competency and training arrangements and any related contractual obligations to ensure all exposures to staff, contractor and network safety and addressed through appropriate training and competency programs and records.

Kleenheat further strengthen its maintenance planning and completion processes by:

- (a) Ensuring that Oracle eAM be updated by the Maintenance Planner with correct forecasted/scheduled start dates for maintenance tasks as outlined in the process flow chart
- (b) Further clarifying the roles and responsibilities of the Maintenance Planner and the Reticulation and Standards Manager
- (c) Establishing a process for escalation of overdue PM tasks.

Action proposed to be taken by Kleenheat

**Action tracked in Cintellate (ACT-126605).**

WesCEF Emergency Services team to update all Emergency Response Plans (EMP's) to include local Emergency Services drills (**complete**).

All Network EMP's updated to include local Emergency Drills (**complete**).

Emergency Drill Preventative Maintenance (PM) work orders raised in the Oracle Maintenance System (eAM) to ensure ongoing tracking including highlighting overdue PM's for action (**complete**).

**Action tracked in Cintellate (ACT-127367).**

Review the need for additional training packages for more routine maintenance tasks.

Update the method of capturing training records to electronic (in progress), and implement automated system for tracking Training KPI's (**complete**).

Undertake formalised EMP review with relevant stakeholders as part of training program at Network Locations.

**Action tracked in Cintellate (ACT-127361).**

(a) Continue implementation of connectivity between Inspectivity and Oracle eAM to ensure work order dates (forecast, scheduled, and completed) are accurate and align with process flow chart.

(b) Update Position Descriptions for Maintenance Planner and Reticulation & Standards Manager to reflect Maintenance Planning role requirements.

(c) Develop an automated system to track overdue work order status (improvement from current excel spreadsheet).

Responsible Person(s)	Target completion date
Mark Jenkins - WesCEF Emergency Services Supervisor	31/10/2023 - Closed
Craig Noakes - KH Maintenance & Training Specialist - Lead	31/12/2023

Tracey Richardson - KH Maintenance Program Manager	30/06/2024
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