



**Combined Post Audit Implementation Plan (PAIP) and Post Review  
Implementation Plan (PRIP)**

**May 2024**



## Combined Post Audit Implementation Plan (PAIP) and Post Review Implementation Plan (PRIP)



### Context

Country Heights Water Pty Ltd (CHW) holds a Water Services Licence WL49, Version 3, dated 1 April 2022, issued by the Economic Regulation Authority (ERA) under the Water Services Act 2012, for the provision of potable water supply in the operating area of the Country Heights Estate some 6km north of the town of Gingin.

Quantum Assurance performed an Operational Audit and Asset Management System Review on the compliance of CHW with the conditions of WL49 and the *Water Services Act 2012* for the period from 21 November 2018 to 30 November 2023 (Quantum Assurance, 2024: Country Heights Water Pty Ltd, 2023 Operational Audit and Asset Management System Review Water Services Licence WL49 Report, Economic Regulation Authority, April 2024).

Quantum Assurance made their evaluation against the licence obligations listed in the Water Compliance Reporting Manual 2021 and in accordance with the 2019 Audit and Review Guidelines: Water Licences of the ERA. The scope of this work relates to assessing Country Heights Water's systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the Licence issued under the Act.

CHW takes cognisance of the opinion of Quantum Assurance that, based on the procedures performed as outlined in the Audit Plan approved by the ERA and the evidence obtained, except for six non-compliances with moderate impact on customers and four non-compliances with minor impact on customers (out of 190 applicable licence obligations), CHW complied, in all material respects, with the licence conditions and relevant legislative obligations for the period 21 November 2018 to 30 November 2023.

With regard to the non-compliances Table 1 details the combined Post-Audit Implementation Plan (PAIP) and Post Review Implementation Plan (PRIP) in accordance with Section 5.2 of the 2019 Audit and Review Guidelines: Water Licences (ERA, 2022).

Table 1: Combined Post Audit Implementation Plan (PAIP) and Post Review Implementation Plan (PRIP)

Recommendation Reference (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action to be taken by CHW	Responsible Function or Person	Target Completion Date
1/2024	<p><b>Information to be included on Invoices</b></p> <p><b>B2</b> Controls generally adequate/non-compliant, minor impact.</p> <p><b>Obligation 102A</b></p> <p>Code of Conduct (Customer Service Standards) 2018 – Clause 13(6)</p> <p>Each bill must contain the prescribed information.</p> <p>The audit reviewed a sample of 12 tax invoices issued to 12 out of 22 customers during the audit period. These tax invoices contained contact information, but this does not include the information stipulated in clause 13(6) of the Code of Conduct as follows:</p> <ul style="list-style-type: none"> <li>▪ Telephone number for complaints.</li> <li>▪ Free call telephone number for the office of the water services ombudsman.</li> <li>▪ A statement that the website contains information about estimates, meter reading and testing, complaints, and review.</li> <li>▪ A statement that the bill can be reviewed in accordance with the licensee's review procedure mentioned in clause 20.</li> </ul> <p>As this information is available on the website and there are only a small number of customers at the present time, this is considered to have a minor impact on customers.</p>	<p>The invoices to customers should include the <i>prescribed information</i> in the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i>, including:</p> <ul style="list-style-type: none"> <li>▪ Telephone number for complaints.</li> <li>▪ Free call telephone number for the office of the water services ombudsman.</li> <li>▪ A statement that the website contains information about estimates, meter reading and testing, complaints, and review.</li> <li>▪ A statement that the bill can be reviewed in accordance with the licensee's review procedure mentioned in clause 20.</li> </ul>	<p>Include the prescribed information on invoices:</p> <ul style="list-style-type: none"> <li>▪ Telephone number for complaints.</li> <li>▪ Free call telephone number for the office of the water services ombudsman.</li> <li>▪ A statement that the website contains information about estimates, meter reading and testing, complaints, and review.</li> <li>▪ A statement that the bill can be reviewed in accordance with the licensee's review procedure mentioned in clause 20.</li> </ul> <p>This will be done to be in line with the Customer Contract.</p>	Administration and Pendragon Environmental Solutions	30 June 2024
2/2024	<p><b>Minimising interruptions to water supply</b></p> <p><b>C2</b> Inadequate controls/non-compliant, minor impact.</p> <p><b>Obligation 144C and 144D</b></p> <p>Code of Conduct (Customer Service Standards) 2018 – Clause 44(1)-(2)</p> <p>The licensee must have policies, practices and procedures for dealing with and minimising the impact</p>	<p>The existing practices, responsibilities, and timing for dealing with and minimising the impact of a burst, leak or blockage in the water supply works should be documented in a brief written procedure.</p>	<p>Document a written policy/procedure regarding existing practices, responsibilities and timing for dealing with and minimising the impact of a burst, leak or blockage in the water supply works.</p>	Athena Water Services and Pendragon Environmental Solutions	30 September 2024

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	<p><i>of a burst, leak or blockage in its water supply works or sewerage works.</i></p> <p><i>The policies, practices and procedures under clause 44(1) must deal with the prescribed matters.</i></p> <p>The site visit confirmed that Country Heights Water has adequate practices in operation to deal with and minimise the impact of a burst, leak or blockage in its water supply works, including continuous remote monitoring and alarms with online access to restart and reset any of the parameters of the scheme. There are 4 people that monitor the plant with a set maintenance monitoring routine and monthly onsite servicing. The water tanks have at least 2 to 3 days backup supply.</p> <p>As there is no written policy and procedure for dealing with and minimising the impact of a burst, leak or blockage in its water supply works or sewerage works, this is considered a minor non-compliance.</p>				
3/2024	<p><b>24 Hour Information Line</b></p> <p><b>C3</b> <i>Inadequate controls/non-compliant, moderate impact.</i></p> <p><b>Obligation 144E</b></p> <p><i>Code of Conduct (Customer Service Standards) 2018 – Clause 45</i></p> <p><i>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 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.</i></p> <p>The Country Heights Water website in the Faults and Outrages page states “URGENT CALLS - Phone (to be advised prior to the first Customer Account is established), such as no water or major water leak.”</p> <p>The Customer Contract in Section 11.4 – Leaks and Fault Assistance states <i>in the event of a leak or break to our water main, an unplanned interruption to supply, or</i></p>	<p>Country Heights Water should provide a 24-hour information line by means of which, at the cost of a local telephone call (excluding mobile telephones), a 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. The contact number should be available on the website and the customer invoices.</p>	<p>A 24-hour contact number by means of which, at the cost of a local telephone call (excluding mobile telephones), a 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 will be added to the website and customer invoices.</p>	Administration	30 June 2024

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	<p><i>a water quality or water pressure problem, you may contact our 24-hour leaks and faults phone service. Our leaks and faults phone number is listed on your bill and on our website.</i></p> <p>The audit noted that neither the website nor the customer invoice provides a 24-hour telephone contact number.</p>				
<p><b>4/2024</b></p>	<p><b>Website Link to Code of Conduct</b></p> <p><b>C3</b> <i>Not performed, controls not assessed in the audit, non-compliant, moderate impact.</i></p> <p><b>Obligation 154A</b></p> <p><i>Code of Conduct (Customer Service Standards) 2018 – Clause 49(3)</i></p> <p><i>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 access to electronic versions of Western Australian legislation.</i></p> <p>The website does not contain a link to the Code of Conduct (2018) as disclosed on the <a href="http://www.legislation.wa.gov.au">www.legislation.wa.gov.au</a> website.</p>	<p>The website should include a link to the current Water Services Code of Conduct (Customer Service Standards) 2018 as included on the <a href="http://www.legislation.wa.gov.au">www.legislation.wa.gov.au</a> website.</p>	<p>A link to the current Water Services Code of Conduct (Customer Service Standards) 2018 as included on the <a href="http://www.legislation.wa.gov.au">www.legislation.wa.gov.au</a> website will be added to the CHW website.</p>	<p>Administration</p>	<p>30 June 2024</p>
<p><b>5/2024</b></p>	<p><b>Family Violence Policy</b></p> <p><b>B3</b> <i>Not performed, controls not assessed in the audit, non-compliant, moderate impact.</i></p> <p><b>Obligation 191, 192, 193 and 198</b></p> <p><i>Water Services Code of Practice (Family Violence) 2020 – Clause 6 and 10</i></p> <p><i>The Licensee must have a family violence policy that sets out the matters specified in clause 5(1).</i></p> <p><i>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</i></p>	<p>a) Country Heights Water should consider establishing a Compliance Register of licence obligations, including Family Violence Policy obligations, particularly if the Code changes.</p> <p>b) The Family Violence Policy should be included on the Country Heights Water website.</p>	<p>a) A Compliance Register will be prepared.</p> <p>b) The Family Violence Policy will be included in the CHW website.</p> <p>c) A link to the current version of the Water Services Code of Practice (Family Violence) 2020 (as it appears on the Department of Justice Government WA website) will be added to the Forms and</p>	<p>a) Pendragon Environmental Solutions</p> <p>b) Administration</p> <p>c) Administration</p>	<p>30 September 2024 (a)</p> <p>30 June 2024 (b and c)</p>

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	<p><i>licence is after 9 December 2020, the day of the grant of the licensee's licence.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p>Country Heights Water has a Family Violence Policy that complies with the Water Services Code of Practice (Family Violence) 2020. The Policy was completed in November 2023. The plant commenced operation in May 2021 so the Policy should have been implemented from May 2021. There is no Compliance Register to record the licence obligations including Family Violence Policy.</p> <p>Country Heights Water's Family Violence Policy was not available on the website at the date of audit. The Principal Hydrogeologist has requested Country Heights Water to include it on the website and confirmed that a hardcopy is available to a customer upon request and at no charge.</p> <p>Country Heights Water's Family Domestic Violence Policy has not been included on the website. There is also no link which provides access to the current version of the Water Services Code of Practice (Family Violence) 2020 (as it appears on the Department of Justice – Government WA website).</p>	<p>c) There should also be a link to the current version of the Water Services Code of Practice (Family Violence) 2020 (as it appears on the Department of Justice Government WA website).</p>	<p>Documents tab of the website; alternatively, consideration will be given to add a separate tab: Useful Links.</p>		

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Reference (no./year) Compliance Rating	Asset System Deficiency (AMS Component/Effectiveness Criteria/Details)	Auditor's Recommendation	Action to be taken by CHW	Responsible Function or Person	Target Completion Date
<p><b>6/2024</b>  B3</p>	<p><b>Asset Management Plan</b> <i>Process: Asset Planning</i> <i>Criteria 1.1: Asset management plan covers the processes in this table.</i></p> <p>A Water Asset Management Plan (AMP) for Country Heights Estate dated October 2018 was provided to the reviewer. The plan was prepared by Athena Water Services as part of the documentation submitted to obtain the original water services licence, granted in November 2018. The water supply became operational in May 2021. However, there are currently only 22 customers (with over 300 customers expected subject to estate development and land sales).</p> <p>Athena Water Solutions (a joint arrangement between Country Heights Water and Athena Water Services) was the original water services licence holder. The licence holder was changed to Country Heights Water Pty Ltd in April 2022.</p> <p>The roles and responsibilities appear to have changed with the establishment of Country Heights Water. The 2018 Asset Management Plan requires revision as the involvement of Athena Water Solutions had changed – now having responsibility limited to maintenance and monitoring with expansion only if and when required.</p> <p>Whilst the processes in this Table are addressed by the supplied AMP, the change of responsibilities, the construction of assets and transition into the Operations and Maintenance (O&amp;M) phase represent changes which should be included in a revision of the AMP.</p> <p>The AMP was prepared before the water scheme was constructed and needs to be revised to capture what has been constructed (actual asset register), the current approach to operations and maintenance (e.g. the Routine Maintenance Plan checklist at Appendix 2 of the AMP is not currently in use), and review of the processes described in the AMP, to reflect the actual</p>	<p>The 2018 Water Asset Management Plan should be updated to describe the current responsibilities and practices for operations and maintenance, the assets constructed (actual asset register) and a general update to the approach of Country Heights Water to the Asset Management processes in this review.</p>	<p>The existing 2018 Water Asset Management Plan will be reviewed updated and specifically:</p> <ul style="list-style-type: none"> <li>▪ Assets (actual register).</li> <li>▪ Key Stakeholders.</li> <li>▪ Responsibilities.</li> <li>▪ Section 2 of the current plan will be reviewed and amended where necessary to align with current assets and practices.</li> <li>▪ Appendix 1 will be updated with the latest plans of the Country Heights Estate at date excluding potential new developments.</li> <li>▪ Appendix 2: the Operation, Maintenance and Renewal Plan will be reviewed and updated to reflect current approaches, practices and procedures and particularly the Routine Maintenance Plan checklist.</li> </ul>	<p>Athena Water Services and Pendragon Environmental Solutions</p>	<p>30 September 2024</p>

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	management of the assets (as appropriate to the scale of the Country Heights Water scheme).				
<b>7/2024</b>  C2	<b>Service Levels</b> <i>Processes: Asset Planning and Environmental Analysis</i> <i>Criteria 1.3: Service levels are defined in the asset management plan.</i> <i>Criteria 4.2: Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved.</i> <i>Criteria 4.4: Service standard (customer service levels etc) are measured and achieved.</i> Section 2.4 of the AMP addresses Levels of Service but only refers to a target for annual water use per property. Section 2.8.4.2 addresses Customer/Technical Service Performance Measures including compliance with the ERA Licence and meeting water quality standards. Availability of supply targets are also listed (to be available 98% of the time). A note is also provided indicating the level of service will be developed more in future AMPs. How service level targets are measured/demonstrated as being achieved also needs development. The minimum flow and minimum and maximum pressure ranges to be supplied to customers contained in the ERA Licence are relevant to the Levels of Service. However, these are not included in the service levels in the AMP.	Now the Scheme is operating, the Levels of Service in the AMP need to be reviewed, to incorporate the water service minimum flow and minimum and maximum pressure ranges and consider how the service level targets can be measured/demonstrated as being achieved.	Service levels will be reviewed in the updated Asset Management Plan including measurement and demonstration of achievement of service levels targets coupled with a process for subsequent updates such as when KPIs change.	Athena Water Services and Pendragon Environmental Solutions	30 September 2024
<b>8/2024</b>  B3	<b>Risk Management</b> <i>Processes: Asset Planning, Environmental Analysis, Asset Maintenance and Risk Management</i> <i>Criteria 1.8: Likelihood and consequences of asset failure are predicted.</i> <i>Criteria 4.1: Opportunities and threats in the system environment are assessed.</i>	a) Now the Scheme is operating, the risk assessment activity in the Asset Management Plan should be carried out at more of a component level to demonstrate preparation for failure events. For example,	a) The risk assessment activity in the Asset Management Plan (to be reviewed and updated) will be carried out at a component level, when required (on-going activity) to	Athena Water Services and Pendragon Environmental Solutions	30 September 2024; a) and c) ongoing afterwards.



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	<p><i>Criteria 6.5: Risk management is applied to prioritise maintenance tasks.</i></p> <p><i>Criteria 8.1: Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.</i></p> <p><i>Criteria 8.2: Risks are documented in a risk register and treatment plans are actioned and monitored.</i></p> <p><i>Criteria 8.3: The probability and consequences of asset failure are regularly assessed.</i></p> <p>Section 2.6 of the AMP (Lifecycle Management Plan) includes a high-level risk assessment for failure of the bore, water treatment plant and distribution pipes based on likelihood and consequence. The risk assessment has not been reviewed or updated and any actions monitored since the AMP was developed in October 2018.</p> <p>There is no documented Risk Register to document the risks and treatment plans and to monitor actions.</p> <p>Asset risk is briefly mentioned as being used to prioritise maintenance. The AMP plan also refers to understanding of asset criticality being used to prioritise risk. Section 2.6 of the AMP (Lifecycle Management Plan) includes a high-level risk assessment for failure of the bore, water treatment plant and distribution pipes based on likelihood and consequence. The risk assessment has not been reviewed or updated and any actions monitored. This includes applying the risk management to prioritise the maintenance tasks.</p>	<p>considering events such as loss of power supply, bush fire, chlorine dosing failure, PLC failure and loss of communications to demonstrate planned responses are in place (including spares and contingency/backup arrangements).</p> <p>b) The risks, ratings, actions and status should be documented in a Risk Register.</p> <p>c) The risk assessment should be applied to prioritise the maintenance tasks.</p>	<p>demonstrate preparation for failure events.</p> <p>b) The risks, ratings, actions and status will be documented in a Risk Register.</p> <p>c) The risk assessment will be applied to prioritise the maintenance tasks (to be updated in the Asset Management Plan and listed as an on-going activity in Appendix 2).</p>		
<p><b>9/2024</b></p> <p>C3</p>	<p><b>Review of Asset Management Plan</b></p> <p><i>Processes: Asset Planning and Review of Asset Management System</i></p> <p><i>Criteria 1.9: Asset management plan is regularly reviewed and updated.</i></p> <p><i>Criteria 12.1 A review process is in place to ensure that the asset management plan and the asset management</i></p>	<p>The Water Asset Management Plan should be reviewed and updated to reflect up to date information and the current approach to managing the assets. A target revision frequency should</p>	<p>The Water Asset Management Plan will be reviewed and updated to reflect up to date information and the current approach to managing the assets. A target revision frequency will be included together with a table indicating when</p>	<p>Athena Water Services and Pendragon Environmental Solutions</p>	<p>30 September 2024</p>

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	<p><i>system described in it remain current.</i></p> <p>The Asset Management Plan was established in 2018 prior to construction of the assets and commencement of operation. A review of the AMP is required. There is no stated revision frequency included in the AMP. A revision table tracking the revision history should also be included.</p>	<p>also be included together with a revision table.</p>	<p>revisions were undertaken and completed.</p>		
<p><b>10/2024</b> B3</p>	<p><b>Health and Safety</b></p> <p><i>Processes: Environmental Analysis</i></p> <p><i>Criteria 4.3: Compliance with statutory and regulatory requirements</i></p> <p>Country Heights Water provided copies of the Memorandum of Understanding (MOU) with the Department of Health (DOH), the September and December 2023 quarterly reports and annual water quality water report for 2022/23 reports for DOH, the Country Heights Estate Drinking Water Source Protection Plan, and an Annual Groundwater Monitoring Summary in relation to the Department of Water and Environmental Regulation (DWER) Groundwater Licence.</p> <p>The September 2023 Quarterly Water Quality Report proposed that the Drinking Water Source Protection Plan will be revisited and updated with 5 years, with the first version due April 2023 (this has not yet been completed).</p> <p>The 2021 Annual Groundwater Summary in Table 4.1 noted the Water Source Protection Planning Department of DWER advised a P2 well-head protection zone of 300m radius will be required around the bore (Bore CEPB1), which does not seem to align with the April 2017 Drinking Water Source Protection Plan which states a well-head protection zone is not required.</p> <p>A sign on the fenced compound surrounding the bore and treatment site identifies the area as the Country Heights Estate Water Reserve. The water services</p>	<p>a) As planned, the 2017 Drinking Water Source Protection Plan should be reviewed and updated.</p> <p>b) The sign at the site compound should be updated to identify Country Heights Water and the emergency contact details reviewed.</p> <p>c) It is recommended some fit for purpose Health and Safety information be developed for the site. A Hazardous Substances sign is included on the gate to the site. A basic site induction incorporating hazards and emergency response plan are recommended.</p>	<p>a) We note that DWER endorsed the 2017 Drinking Water Source Protection Plan with no requirement for future updates hence the DWSPP will be reviewed and updated, if advised by and in consultation with DWER (we are currently in consultation with DWER).</p> <p>b) The sign at the site compound will be updated to identify Country Heights Water and the emergency contact details including the 24-hr telephone number and website details.</p> <p>c) Fit for purpose Health and Safety information will be developed for the site. The Hazardous Substances sign on the gate to the site will be reviewed. A basic site induction incorporating hazards and emergency responses will be documented and implemented when required.</p>	<p>Pendragon Environmental Solutions: a) Athena Water Services: b) and c)</p>	<p>30 September 2024; c) on-going</p>

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	provider and contact details are provided for Athena Water Services.				
<b>11/2024</b>  C2 B3 B3	<p><b>Operational Monitoring and Water Sampling</b></p> <p><i>Processes: Asset Operations and Asset Maintenance</i></p> <p><i>Criteria 5.1: Operational policies and procedures are documented and linked to service levels required.</i></p> <p><i>Criteria 6.1: Maintenance policies and procedures are documented and linked to service levels required.</i></p> <p><i>Criteria 6.3: Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.</i></p> <p>The system operation is automated and visits to the site occur monthly or more frequently if required to attend to alarms, replenish chemicals and undertake sampling. Although not documented, maintaining availability of the supply is the key service level being maintained.</p> <p>Brief documentation outlining the responsibilities/duties of Country Heights Water service providers for operational aspects is recommended, together with a record of completion.</p> <p>It was noted that the sampling point used to report on the chlorination level supplied to customers is located at the outlet of the treated water tank, which may not be representative of the water received by customers. The location of the sampling point should be discussed with the Department of Health to ensure this sampling location is adequate. Otherwise, a reticulation sampling point closer to customer supply points may be required to demonstrate a disinfection residual is being maintained.</p> <p>A Routine Maintenance Plan was appended to the AMP, which provides a checklist record for the routine tasks undertaken each time the site is visited. This does not appear to be in use. Plans are also attached to the AMP outlining water sampling procedures and an</p>	<p>a) Brief fit-for-purpose documentation outlining the responsibilities and duties of Country Heights Water service providers for operational aspects is recommended together with a record of completion.</p> <p>b) The location of the sampling point recording chlorination level supplied to customers (not within the pipe reticulation network) should be confirmed with the Department of Health.</p> <p>c) A maintenance log (such as the log contained in Appendix 2 of the AMP) is recommended to be introduced to demonstrate completion of O&amp;M tasks and provide a history of maintenance issues and recording of asset condition information.</p>	<p>a) Fit-for-purpose documentation outlining the responsibilities and duties of Country Heights Water service providers for operational aspects together with a record of completion will be prepared.</p> <p>b) The Department of Health agreed to two sampling points: one at the water treatment plant (prior to reticulation) and one at the Display Home (in the reticulation network).</p> <p>c) A maintenance log will be implemented and kept at the Water Treatment Plant.</p>	<p>Athena Water Services and Pendragon Environmental Solutions</p>	<p>a) and c): 30 September 2024 b) completed.</p>

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	<p>annual inspection plan for the water reticulation network. The AMP section 2.8.4.3 (WTP Maintenance) indicates logs of all maintenance and plant checks made will be housed in the office at the WTP, however this does not appear to be occurring.</p>				
<p><b>12/2024</b> B3</p>	<p><b>Incident Response Plan</b> <i>Process: Contingency Planning</i> <i>Criteria 9.1: Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</i></p> <p>Section 2.6 of the AMP (Lifecycle Management Plan) includes the contingency plans for failure of the bore, water treatment plant or distribution pipes based on likelihood and consequence assessments. The contingency plans include preventative action such as regular testing and inspections. The likelihood of any failure is rated Low to Medium.</p> <p>There are no documented incident response plan in the event of a failure of the bore, water treatment plant or distribution pipes; and no evidence of any testing of response plans.</p>	<p>The contingency plans for the response in the event of a failure of the bore, water treatment plant or distribution pipes should be documented in an Incident Response Plan, including testing of the plan on an annual basis.</p>	<p>Contingency plans will be developed and documented in an Incident Response Plan.</p>	<p>Athena Water Services and Pendragon Environmental Solutions</p>	<p>30 September 2024</p>
<p><b>13/2024</b> B3</p>	<p><b>Financial Reporting</b> <i>Process: Financial Planning</i> <i>Criteria 10.3: The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets).</i> <i>Criteria 10.4: The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period.</i></p> <p>The AMP in Section 2.7 Financial Summary Water Supply Infrastructure provides financial projections over 25 years for ongoing expenses, renewal/new work costs and total expenditure. There is no major capital expenditure planned in the next 5 years.</p> <p>The financial plan does not include the projected income and profit or loss for each financial year. The AMP in</p>	<p>The AMP should be reviewed and updated with the current KPI, performance measures and reporting, include annual profit and loss and balance sheet reporting and review.</p>	<p>Current KPI, performance measures and reporting, including annual profit and loss and balance sheet reporting and review will be included in a revised Asset Management Plan.</p>	<p>Administration</p>	<p>30 September 2024</p>

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	<p>Section 2.8 Asset Quality Management Practices and Performance Measures includes comprehensive Profit and Loss KPIs, Balance Sheet KPIs and Financial Performance Measures and reporting. There was no evidence provided that this KPI reporting has been implemented by Country Heights Water.</p> <p>The financial plan does not include the projected income and profit or loss for each financial year for the next 5 years and beyond.</p>				