



## Wannon Water - submission

**From:** Steven Kearns <[REDACTED]>  
**Sent:** Tuesday, December 19, 2023 1:18 PM  
**To:** Water (ESC) <[water@esc.vic.gov.au](mailto:water@esc.vic.gov.au)>  
**Subject:** RE: Proposed changes to our Water Industry Standards [SEC=OFFICIAL]

Hi,

Please see our response below.

### Obligation on water businesses to report non-compliance

We support the proposed changes. Our current approach has been to report any non-compliance to Essential Services Commission.

Proposed clause 25(a) provides that a water business must have adequate procedures, policies and practices in place to identify non-compliance with these standards in a timely and efficient manner. It is open to interpret what is meant by "adequate procedures, policies and practices". Set out below is how we currently approach the interim requirement and we see this approach as being adequate to meet the proposed changes to the Water Industry Standard.

1. Organisation wide incident reporting procedure and system that requires the reporting of any incident that involves non-compliance with legal or statutory requirements
2. Organisation wide Zero Harm Safety Behaviours that require all employees to use our systems to log hazards, risks and incidents
3. Organisation wide culture of "no blame" and living our values including being open, honest and impartial
4. Regular audits including internal management audits, internal audits conducted by external auditors and regulatory audits
5. Other procedure and reporting mechanisms including people matter survey results and complaints and feedback processes.

### Obligation on water businesses to assist customers affected by family violence

We support the proposed changes. As previously advised, we are undertaking work on our procedural environment to continue to improve our processes.

I can be contacted if you have any questions

**Steven Kearns**

**Branch Manager Customer Services**

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