Eastern Waste Management Authority Special Audit & Risk Management Committee Meeting

Agenda

Thursday 13 August 2026

Notice is hereby given that a special meeting of the Eastern Waste Management Authority Audit & Risk Management Committee will be held via Microsoft Teams on Thursday 13 August 2026 commencing at 3.30 pm.

Acknowledgement of Country

We would like to acknowledge this land that we meet on today is the traditional lands for the Kaurna people and that we respect their spiritual relationship with their country.

We also acknowledge the Kaurna people as the custodians of the Adelaide region and that their cultural and heritage beliefs are as important to the living Kaurna people today.

Agenda

Eastern Waste Management Authority
Special Meeting of the Audit & Risk Management Committee

Meeting to be held on Thursday 13 August 2026 commencing at 3.30 pm,
via Microsoft Teams

Join: https://teams.microsoft.com/meet/42966110015738?p=mYAAQzQne8OzwZNLnP
Meeting ID: 429 661 100 157 38
Passcode: dC7so7c3

1. Present

2. Acknowledgement of Country

3. Apologies

4. Declarations of Interest

5. Adjourned Business

Matters Referred from the East Waste Board

6. Reports

7. Confidential Reports

Nil.

8. Next Meeting of the Audit & Risk Management Committee

The next Ordinary Audit & Risk Management Committee Meeting is proposed to be held on: Wednesday 16 September 2026, at HenderCare (SA) 3/ 81 Flinders St, Adelaide.

9. Closure of Meeting

5.1 Re-presentation of Internal Audit Result: Payroll (Adjourned Item)

Report Author	Acting Manager Business Services
Attachments	A: UHY Haines Norton Internal Audit Report - Payroll

Purpose and Context

To re-present to the Audit & Risk Management Committee (the Committee) the results of the recent payroll audit undertaken by East Waste's appointed internal auditor's UHY Haines Norton, as suggested by the East Waste Board at the November 2025 ordinary meeting.

Recommendation

That the Audit & Risk Management Committee receives and notes the Payroll Internal Audit Report prepared by UHY Haines Norton, as presented in Attachment A - 'UHY Haines Norton Internal Audit Report' (*Item 5.1, Special Audit & Risk Management Meeting, 13 August 2026).*

Background

East Waste's first internal audit cycle commenced 1 July 2025, with the Payroll Audit undertaken in September 2025, and the results presented by UHY Haines Norton to the November Audit & Risk Management Committee meeting. While the Committee expressed satisfaction with the result, the East Waste board expressed an interest in East Waste's level of comfort where payroll risks remain as 'Medium,' particularly where no recommendations were made, and questioned whether the format was adequate. The Board was comfortable to note the report, however it was suggested, at the discretion of Administration, that it be re-presented to the Audit & Risk Management Committee for further discussion and comment.

Discussion

Administration initiated further discussions with representatives from UHY Haines Norton relating to the results of the recent Payroll Audit and the requested refinements to the report. UHY Haines Norton has since worked directly with the Chair of the Audit & Risk Management Committee to refine the report format, in line with Board and Committee feedback. The Internal Audit Report is presented at Attachment A (***refer Attachment A***) in a revised format, for final review of the Committee.

UHY Haines Norton acknowledges that East Waste is yet to formally determine its risk tolerance, and until the relevant decisions are made by the East Waste Board, a risk tolerance of low to medium has been assumed to drive the recommendations of internal audits.

As recommendations are implemented by East Waste, further review with be undertaken by UHY Haines Norton. An internal Audit tracking schedule is maintained which provides further context on progress against recommendations, and is included as a standing item on the Audit & Risk Management Committee Agenda.

Administration is seeking feedback from the Committee relating to the revised internal audit report format.

UHY Haines Norton

Internal Audit Report – Payroll

East Waste

October 2025

(Re-formatted July 2026)

Disclaimer: This document is for the exclusive use of the person/entity named on the front of this document ('Recipient'). This document must not be relied upon by any person who is not the Recipient. UHY Haines Norton does not take responsibility for any loss, damage, or injury caused by the use, misuse, or misinterpretation of the information in this document by any person who is not the Recipient. This document may not be reproduced in whole or in part without permission.

Liability limited by a scheme approved under the Australian Professional Standards Legislation.

Lead Report Author: Corinne Garrett
Internal Auditor: Karen Peake
25 Peel Street, Adelaide SA 5000
Tel 08 8110 0999
ABN: 37 223 967 491

Executive Summary

Background

East Waste, the trading name of the Eastern Waste Management Authority, is a regional subsidiary established under Section 43 of the Local Government Act 1999 to provide waste collection services to its Member Councils. The Authority provides services on behalf of its 8 constituent councils, with the nature of services determined by each council to meet local community needs.

In order to deliver these services effectively, East Waste requires efficient processes supported by appropriate documentation, system controls, approval workflows and reconciliation practices.

Diagram 1 – East Waste – service summary

Data Source: East Waste website

Key Risks and Priority Findings

This internal audit reviewed the organisation's payroll function, including payroll processing, payroll-related policies and procedures, financial delegations, Kronos and MYOB system configuration, system access, masterfile amendments, payroll reconciliations, end-of-financial-year processes and selected payroll calculations, as well as the specific issue of contractor or employee definitions and backdating of superannuation payments for those independent members on their Audit & Risk Committee.

Overall audit conclusion: Based on the work performed and evidence reviewed, the payroll processes were found to be positive, well-established, clearly documented and with effective controls in place. Payroll testing found systems to be well embedded, widely understood, timely and effective, with appropriate review points and evidence of control operations across the 2024/25 payroll year.

A 20% testing sample was implemented, with a full walkthrough test to further check process accuracy, timeliness and relevance.

Main findings:

Assurances were gained across the samples tested, with a strong control environment, regular reconciliations, assigned delegations, access reviewed and evidence retained.

Opportunities were also identified to strengthen payroll governance, financial control, evidence retention and continuity.

The most important of these opportunities being in relation to;

- increasing the efficiency and effectiveness of verification for the drivers fortnightly timesheet data,
- a holistic review across the organisation so that like for like duties are seen to be consistently assessed and rewarded, and
- the independent members on the ARC having a timely correction to the retrospective issue of superannuation contributions.

Additional priority matters include:

- Business continuity options for Kronos and MYOB,
- current manual intervention required for some part-time/RDO payroll arrangements,
- periodic review and evidence of system access,
- evidence and retention of EOFY parameter checks and reducing reliance on manual processes where practical.

Future consideration may be given for additional support from a localised user group and/or developing system functionality with increased use of automated data table links as/when appropriate.

These matters do not indicate widespread payroll processing error in the items tested. They do, however, indicate that East Waste should strengthen formal control evidence, reconciliation discipline and payroll resilience to reduce residual governance, financial reporting and compliance risk.

Objective, Scope and Methodology

This assurance audit assessed the compliance, adequacy and accuracy of East Waste's payroll controls and processes. The objective was to test and review the payroll function to confirm appropriate and accurate processing across the 2024/25 payroll year. The full audit scope is included at Appendix A.

Audit work included discussions and walkthroughs with the Manager HR & Financial Services and the Payroll Officer, together with review of policy documentation, transactional payroll data and supporting records at East Waste's Temple Court site.

Testing covered each fortnightly payroll run for July 2024 to June 2025, including representative sample testing of payroll data and reconciliation to supporting source documentation. The audit focused on pay agreements, awards, contracts, system parameters, allowances, superannuation, payroll deductions, reconciliations, contractor status and prior audit recommendations.

Note: Testing was evidence-based, 20% sample size, risk-focused and proportionate to East Waste's workforce profile. Findings include root cause commentary and recommendations designed to be practical for the organisational size, resources and operating environment.

Internal Audit Standards and Engagement Basis

This internal audit engagement was conducted as an assurance review of East Waste's payroll function. The review was undertaken using a methodology consistent with recognised internal audit practice and the principles of the Global Internal Audit Standards issued by the Institute of Internal Auditors.

The engagement was designed to provide East Waste and their ARC with assurance over the accuracy, compliance and control effectiveness of payroll processing, including payroll-related policies, delegations, system configuration, access controls, reconciliations, selected payroll calculations and supporting evidence.

The internal audit work was performed independently of the organisation's payroll operations. The internal auditors did not undertake management responsibilities, make payroll decisions, process payroll transactions or implement payroll controls. Responsibility for the design, implementation and operation of payroll controls remains with East Waste's management.

The audit conclusion is based on interviews, walkthroughs, documentation reviewed, system observations and sample testing performed during the engagement. Internal audit does not provide absolute assurance, and the work performed should not be interpreted as a full re-performance of all payroll transactions or a guarantee that all errors, exceptions or control weaknesses have been identified.

Findings and recommendations have been prepared to support management action and Audit and Risk Committee (ARC) oversight. Recommendations are intended to strengthen payroll governance, control evidence, reconciliation discipline, continuity arrangements and compliance with relevant employment and payroll obligations.

Payroll Risk Context

Payroll is a high-reliance business process because it affects employee payments, statutory compliance, financial reporting, data security and organisational continuity. Payroll controls should therefore reduce the risk of incorrect payments, unauthorised changes, privacy breaches, unreconciled balances, incomplete financial records and non-compliance with employment obligations.

For payroll controls to be effective, the organisation needs assurance that:

- payroll is processed in accordance with relevant legislation, Awards, Enterprise Agreements and employment contracts;
- pay is calculated accurately, reliably and on time;
- payroll changes are appropriately authorised, supported and reviewed;
- system access is restricted to appropriate officers and periodically reviewed;
- payroll data is securely maintained and properly integrated with HR, time management and financial systems; and
- payroll balances are reconciled and exceptions are investigated promptly.

Internal Audit Observations

The audit observations indicate that East Waste's payroll process is well understood by key officers and supported by practical review and verification controls. The relatively small payroll population allows for detailed review of payroll variations, timesheet approvals and supporting documentation each pay run.

- **Manager of HR and Financial Services** – strategic discussion, finance overview, delegations and reconciliation processes, also HR process inputs, contract updates, new starters and employment changes.
- **Payroll Officer** – walkthrough observations, payroll process discussion and supported testing.

The audit also noted that the control environment relies heavily on the experience and availability of the Payroll Officer and the final review undertaken by the Manager of HR and Financial Services. While this is practical for the organisation's current workforce size, it increases the importance of documented procedures, evidence of review, adequate delegations, reconciliations and periodic system access checks.

The following positive control attributes were observed:

- ✓ payroll processing is well understood by the Payroll Officer and supported by practical review processes;
- ✓ Kronos and MYOB provide an integrated timesheet and payroll workflow platform that supports payroll processing, staff timesheet entry and supervisory approvals;
- ✓ final payroll review with the Manager of HR and Financial Services provides an important compensating control for a small payroll team.

Internal Audit Methodology

This internal audit was undertaken using a structured, risk-based methodology aligned to the agreed scope of work and the approach set out in the quote. The methodology included five phases: planning, desktop review, fieldwork and testing, analysis of findings, and reporting.

During the planning phase, internal audit confirmed the audit scope, information requirements, key contacts, timing and access arrangements with the organisation and a request list was used to obtain relevant payroll, HR, finance and system documentation.

The desktop review considered Enterprise Agreements, Awards, employment contract templates, payroll-related policies, delegations, approval processes, Kronos & MYOB configuration information, system access arrangements, reconciliation processes and end-of-financial-year payroll procedures. This review provided the basis for targeted fieldwork, with a complete real-time walkthrough, a minimum of 10% sampling, often more and relevant testing.

Fieldwork included interviews and process walkthroughs with officers in payroll, HR and finance positions. The walkthrough traced payroll information from source documentation and timesheet input through Kronos and MYOB processing, review, approval, payment and transfer to the ledger system. This allowed internal audit to assess how payroll controls operate in practice and how exceptions, manual adjustments and review processes are managed.

Substantive testing was performed on selected payroll records and calculations, including contract data, pay rates, allowances, leave accruals, superannuation settings, salary sacrifice arrangements, Defined Benefit scheme arrangements, termination-related matters where relevant, and selected manual adjustments. Testing was risk-focused and proportionate to the payroll population and workforce profile.

Findings were assessed against the organisation's risk management framework, the control effectiveness ratings used in this report and the potential impact on payroll accuracy, compliance, financial reporting, fraud control, data security and governance. Recommendations were developed to be practical for the organisation's size, available resources and current payroll operating environment.

Testing Approach and Sample Basis

The audit testing was performed on a sample basis and was not designed to re-perform all payroll transactions. Sample selection focused on risk areas identified during planning and walkthroughs, including senior management contracts, manual adjustments, part-time/RDO arrangements, leave accruals, allowances, superannuation settings, salary sacrifice, system access, masterfile amendments and payroll reconciliations.

Where specific sample sizes are referred to in the report, the conclusion should be read in that context. Where the report refers to the payroll population or broader process observations, those observations are based on interviews, walkthroughs, documentation reviewed and the evidence made available during the audit.

Summary of Testing and Significant Observations

The audit included a full walkthrough of the payroll process, supported by targeted testing across the agreed audit scope. The walkthrough assessed payroll preparation, timesheet processing, manual adjustments, review and approval controls, payment processing, and transfer of payroll information from Kronos to MYOB.

The pay run tested included automated timesheets and manual timesheet adjustments, full-time and part-time working patterns, off-site and outdoor service areas, additional hours, overtime rates and selected payroll adjustments.

- **Time keeping** – electronic time recording is in place and provides an effective interface to payroll processing
- **Payroll** - At the time of testing, the organisation had an average of 76 staff in the payroll population.
- **Process** – payroll processes were operating effectively, with documented workflows, appropriate review points, segregation of roles and records retained through the Kronos and MYOB systems.
- **Policies and documentation** – payroll practices were consistent with the Annual Leave Policy and related documentation reviewed.
- **Awareness/Training** – with time recording, the logging on and logging off process is known to all and is operating well, it is convenient and easy to use, available at designated workstations and/or via mobile phones. There were no issues or failings observed, and all driver details are further verified by the Coordinator Operations.

  Whilst on site, brief discussions were undertaken with the newly recruited General Manager, providing an outline of the current audit and ongoing internal audit plan for 2025/26 and 2026/27. It was noted that training was an area for initial focus being a key driver for future success of the business.
- **Agreements/Awards/Contracts** – pay details were checked for accuracy to source documentation and found all were paid the rates outlined in their contracts/letters of engagement.
- **Consistency of work/pay** – a review was undertaken across the organisation in order to assess consistency of work to pay rate. Whilst a few instances were found where positions were similarly titled, the substance of each job was not readily comparable. For example, amongst the teams of drivers, routes differ making it impossible to ascertain definitively from one area to another, some routes are longer, have more hours and additional allowances.
- **Contractor vs Employee status** – two positions were identified on the organisational chart as currently being undertaken by contractors. Further analysis will be undertaken, regarding the way in which these individuals' source and conduct their business, with amendments made to the organisational structure as required. Reference should be made to the 'assessment of contractor vs employee' as provided by the ATO and attached at Appendix C.
- **Superannuation for ARC Members** – Related to the raised awareness for existing legislation requiring superannuation to be provided for independent ARC members. Currently there is no provision in place at East Waste, however the SA Local Government Financial Management Group (SALGFMG), is shortly due to clarify details of how to progress both the overdue compliance and current payments - including any identified backdated payments.

  Note: the superannuation provision has been instigated, with further investigatory work being undertaken with regard to accounting for related backpay.

Table 1: Summary of Audit Testing

#	Working Paper Reference	Recommend-ations	Risk Rating	Effectiveness Rating	Priority Rating
1	Assess related Enterprise Agreement, Awards, Employment Contracts, National Employment Standards (NES) and internal payroll function policies, as relevant.	0	MEDIUM	FULLY EFFECTIVE	LOW
2	Confirmation of accurate calculation and appropriate implementation across the 2024/25 payroll function	1	MEDIUM	FULLY EFFECTIVE	LOW
3	Review to ensure completeness of implementation for all related pay agreements, awards, contracts, standards and policies	0	MEDIUM	FULLY EFFECTIVE	LOW
4	Review of regulated allowances	0	LOW	FULLY EFFECTIVE	LOW
5	Review and testing of system parameters to include rates, allowances & superannuation	0	LOW	MOSTLY EFFECTIVE	LOW
6	Reconcile to relevant organisational policy documentation	0	LOW	MOSTLY EFFECTIVE	LOW
7	Review consistency of work and undertake payrate comparisons across the organisational structure	1	LOW	MOSTLY EFFECTIVE	LOW
8	Check the interpretation and calculation of specific payments; termination payments, identified ad hoc payments, back pay and leave cash out payments	0	MEDIUM	FULLY EFFECTIVE	LOW
9	Check that payments to all deduction agencies are completed in a timely and accurate manner	0	LOW	FULLY EFFECTIVE	LOW
10	Review of employment contract details with specific focus on contractor/employee status and superannuation arrangements	2	MEDIUM	PARTIALLY EFFECTIVE	HIGH
11	Review payroll system reconciliations for accuracy and timeliness	0	LOW	FULLY EFFECTIVE	LOW
12	Review any recommendations out of the Leave Balances audit and any other related audits	0	LOW	MOSTLY EFFECTIVE	MODERATE

Risk Management – Risk Rating

East Waste's Strategic Risk Register includes one risk with alignment to the payroll function:

Table 2: Strategic Risk Data

#	Risk	Risk Category	Inherent Risk Rating	Current Risk Rating	Residual Risk Rating
SR2	Lack of effective governance and decision making process may result in not meeting community / Member Council expectations, adversely impact East Waste's finances and damage to reputation.	Governance, Legal and Compliance	EXTREME	LOW	LOW

The findings relating to financial delegations, legislative references in policies, payroll reconciliations and evidence of management review indicate that payroll-related governance and compliance controls are in place and operating well. As SR2 is currently rated '**LOW**' at both current and residual risk level, this payroll audit findings support the need for robust actions which are currently in place, however a number of recommendations have been identified to further strengthen this key strategic operation.

There are also partial links to ICT security and business resilience as the payroll function relies on MYOB and Kronos systems, access controls, data security, continuity arrangements and accurate transfer of payroll data to the Ledger system. The audit did not identify evidence of payroll data compromise or system failure; instead the findings on access review, business continuity options, EOFY parameter checks and interface reconciliations support continued focus on system control evidence.

Overall, the payroll audit findings found no widespread payroll processing error in the items tested. The risk rating conclusion is that the organisation's payroll accuracy controls are generally operating effectively for the sample reviewed, however the residual risk can be further strengthened by continued review of governance, reconciliations, access reviews and evidence-retention.

Risk Management – Effectiveness Rating

East Waste's Risk Management Framework requires periodic review of risk management policies, systems and procedures to evaluate whether controls remain effective and suitable for supporting strategic and operational objectives.

For the payroll function, the audit found that the majority of practical controls are operating effectively, particularly payroll processing knowledge, workflow approvals, supporting documentation and final management review prior to payment. These controls provide assurance over the accuracy of payroll outcomes for the sample tested.

On this basis, the payroll control environment should be viewed as '**MOSTLY EFFECTIVE**' in processing payroll accurately for the items tested, These controls will improve East Waste's ability to demonstrate that payroll risks are being managed consistently and within risk appetite.

Table 3: Risk Management – Operating Effectiveness Ratings

FULLY EFFECTIVE	*- Control activities deployed through established up-to-date policies that are regularly reviewed.* *- Control activities actively contribute to risk mitigation.* *- Technology controls are aligned to the achievement of objectives.*
MOSTLY EFFECTIVE	*- Control activities deployed through established policies.* *- Control activities generally contribute to risk mitigation.*
PARTIALLY EFFECTIVE	*- Control activities may be deployed through established policies which may not be reviewed and up-to-date.* *- Control activities may contribute to risk mitigation.*
INEFFECTIVE	*- Control activities deployment through established policies is suboptimal.* *- Control activities contributing to risk management are sub optimal.*

Source: COSO Internal Control Framework 2013

Conclusion

Based on the work performed and evidence reviewed, internal audit provides '**MODERATE to POSITIVE'** assurance over payroll processing accuracy.

- The risk environment is assessed as 'low', aligning with the organisation's strategic risk register.
- The overall effectiveness of the control environment is assessed as 'mostly effective' for payroll processing accuracy in the areas tested, with targeted improvements required to strengthen governance, reconciliation, evidence retention and continuity controls.

The audit;

- did not identify evidence of widespread payroll processing error in the items tested. Payroll processing is supported by the Payroll Officer's strong working knowledge, the use of Kronos timesheeting data and workflow functionality, supporting documentation and final review by the Manager HR and Financial Services.
- identified the highest priority matters as; improving the efficiency and effectiveness of elements within the timesheet data processes, ensuring visibility for parity across the organisation where positions undertake similar roles and ensuring that the superannuation issues relating to independent members of the ARC are progressed in accordance with recent SALGFMG clarifications.
- detailed other recommendations in relation to documenting and retaining evidence of EOFY parameter checks, periodically reviewing and evidencing payroll system access, clarifying business continuity options, reducing manual intervention where practical, and improving the use of automation and documented payroll guidance.

The implementation of the identified recommendations will assist East Waste to better demonstrate that payroll-related risks are being managed consistently and within its risk management environment.

We acknowledge the assistance provided by officers during the audit, including access to payroll documentation, system records and practical walkthroughs of the payroll process.

Summary of Key Findings and Recommendations

Key: *R= Risk Rating, E = Effectiveness, P = Priority*

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
1.0 Assess related Enterprise Agreement, Awards, Employment Contracts, National Employment Standards (NES) and internal payroll function policies, as relevant.						
Medium	Fully Effective	Low	The payroll system at East Waste recognises the following: (i) fixed term contract (ii) SAMSOA – salaried officers award (iii) LGE – Local Government Employee award (SAET) (iv) Eastern Waste Management Authority (East Waste) Enterprise Agreement 2024-2027 (EBA) These pay agreements were referenced when testing pay rates back to the respective rates held in MYOB payroll system. A sample of employees were randomly selected from the organisational structure listing provided at the onset of this audit and are identified by their employee number in the summary table: (see table below)	**None**	**None required**	**N/A**
2.0 Confirmation of accurate calculation and appropriate implementation across the 2024/25 payroll function						
Medium	Fully Effective	Low	A walkthrough test was undertaken on the payroll run of 1st October 2025. All transactional found to be accurate and timely, although time pressures were noted within the drivers work team. In addition, to the above, detailed transaction testing was undertaken across all 26 payroll runs. - Testing reviewed: early starts / overtime / annual leave / personal leave / meal allowances / adjustments for different work patterns ie: study leave, unpaid leave etc. With reference to Annual Leave Balances: - Annual leave report run after payroll finalised, this is then imported back into Kronos to provide updated leave balances.	**R2.0** Review and implement an alternative internal process for confirmation of the drivers' fortnightly payroll data (to support Coordinator Operations with manual workload)	Management will ensure additional controls are implemented, primarily for the payroll officer, to reduce risk of input error into the timekeeping system by Operational staff. Whilst this happens generally it is acknowledged that it is at times ad hoc, and a consistent approach will ensure accuracy of data entry. This will be implemented immediately in line with upcoming pay cycle.	**12/11/26**
3.0 Review to ensure completeness of implementation for all related pay agreements, awards, contracts, standards and policies						
Medium	Fully Effective	Low	Sample records (24) were checked to the MYOB system. All records found to be complete and accurate. Checks were made to the employee data to verify names and payrates.	**None**	**None required**	**N/A**

Detail	Qty	Employee No.
Contracted	3	150 / 53 / 240
SAMSOA	3	122 / 193 / 197
LGE	2	221 / 191
EBA	8	24/49/104/180/224/173/113/211
	16	

Key: *R= Risk Rating, E = Effectiveness, P = Priority*

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
4.0 Review of regulated allowances						
Low	Fully Effective	Low	Allowances were noted as payable for the following: - Meal allowance - Licence Allowance - Mobile Phone Allowance - Motor Vehicle Allowance All found to be accurate and correctly applied.	**None**	**None required**	**N/A**
5.0 Review and testing of system parameters to include rates, allowances & superannuation						
Low	Mostly Effective	Low	System parameters were reviewed in detail via a walkthrough with the Manager Human Resources & Financial Services. There are a number of system parameters updates that the Manager Human Resources and Financial Services can undertake in relation to new pay awards, eg: when new payrates, allowance levels and superannuation percentages are required. These were explained and illustrated.	**None**	**None required**	**N/A**
6.0 Reconcile to relevant organisational policy documentation						
Low	Mostly Effective	Low	For this payroll audit the relevant organisational policy documentation was taken to be the Leave Policy. This policy had been recently issued and will be scheduled for review in 2 years' time. The policy is the responsibility of the General Manager and provides an overview of the range of leave entitlements, a new and key source of clarification, linking to relevant legislation and citing the LGE, SAMSOA and EBA as relevant documentation.	**None**	**None required**	**N/A**
7.0 Review consistency of work and undertake payrate comparisons across the organisational structure						
Low	Mostly Effective	Low	A consistency and transparency check resulted in a holistic review being undertaken across the organisation in order to assess consistency of work outline to pay rate. Whilst a few instances were found where positions were similarly titled, eg: drivers, coordinators, managers, the detail behind the roles and responsibilities was found to vary.	**R7.0** Consider scheduling an ongoing review of similarly titled positions, eg: coordinator roles, driver roles, to provide an opportunity for cross skilling /experiencing variations and wider skills and knowledge bases.	Management acknowledges these findings, noting there is some variation in work hours/location, specifically for Drivers. The variations across Leadership and Executive staff are considered not to be material. Management remains engaged with staff and encourages open conversation with employees and where possible will align rostering to employees' personal preferences and circumstances.	**28/02/26**

Key: *R= Risk Rating, E = Effectiveness, P = Priority*

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
8.0 Check the interpretation and calculation of specific payments; termination payments, identified ad hoc payments, back pay and leave cash out payments						
Medium	Fully Effective	Low	During the walkthrough testing 01/10/25, payments specific to these areas was evidenced and tested; - termination payments, - ad hoc payments, - back pay and - leave cash out payments. All calculations were checked to source documentation and input calculations and found to be accurate and fully substantiated.	**None**	**None required**	**N/A**
9.0 Check that payments to all deduction agencies are completed in a timely and accurate manner						
Low	Fully Effective	Low	A consistency and accuracy check. This is undertaken as part of the fortnightly payroll function, with all relevant deduction payments made within the payment period terms. All deduction payments were found to be timely - as required after the payment run.	**None**	**None required**	**N/A**
10 Review of employment contract details with specific focus on contractor/employee status and superannuation arrangements						
Medium	Partially Effective	High	To clarify the status of employee vs contractor / and the superannuation provision for ARC Members Investigations were undertaken to clarify details for both of these separate issues and with regard to the superannuation arrangements, further reference was taken via the SALGFMG. (i) Status of employee vs contractor - two organisational positions were being undertaken by contractors at the time of this audit	**R10.0** Undertake a review, incorporating the ATO assessment guide, to fully ascertain whether the EA Officer fits the contractor definition. .	Management notes the associated risk and agrees with the recommendation, noting a definitive assessment is required to determine the true nature of the relationship. Management has commenced the process of reviewing the terms of the contractual arrangement and will look to implement a compliant and suitable resolution as soon as practicable.	**31/12/25**

Key: R= *Risk Rating, E = Effectiveness, P = Priority*

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
Medium	Partially Effective	High	(ii) Superannuation provision for ARC Independent Members - this has been included in this scope in order to clarify the position and the requirements relating to superannuation legislation ie: the Superannuation Guarantee (Administration) Act 1992. This relates to providing superannuation payments for the independent members of the East Waste ARC.	**R10.1** Establish a process for paying ARC independent members superannuation, to be activated once SALGFMG confirm details	Management will make contact with Independent Committee members to obtain superannuation information and implement a suitable process to make superannuation contributions on behalf of members in line with the next meeting cycle. We will await advice from SALGFMG relating to back payment obligations.	**31/12/25**
11.0 Review payroll system reconciliations for accuracy and timeliness						
Low	Fully Effective	Low	Details of the reconciliation process were provided by the Finance Officer. The 2024/25 reconciliation covers the YTD, so is an accumulated total and is balanced to screenshots of the relevant ledger codes. The sum of all payroll credits and debits and a balancing figure being the accumulated balance paid to child support.	**None**	**None required**	**N/A**
12.0 Review any recommendations out of the Leave Balances audit and any other related audits						
Low	Mostly Effective	Moderate	Reference was given to a previous 'Leave Balances' audit. The 2023/24 EOFY audit undertaken by Galpins highlighted 'Management of excessive annual leave balances'. The annual leave balances have been reviewed for 2024/25 and all fall within the allowed policy position of 8 week maximum balance.	**None**	**None required**	**N/A**

Detailed Findings and Recommendations

<table>
<tr><td>1.0</td><td colspan="6">Assess related Enterprise Agreement, Awards, Employment Contracts, National Employment Standards (NES) and internal payroll function policies, as relevant.</td></tr>
<tr><td>Findings</td><td colspan="3">Summary
The payroll system at East Waste recognises the following: (i) fixed term contract (ii) SAMSOA – salaried officers award (iii) LGE – Local Government Employee award (SAET) (iv) Eastern Waste Management Authority (East Waste) Enterprise Agreement 2024-2027 (EBA)

These pay agreements were referenced when testing pay rates back to the respective rates held in MYOB payroll system.

A sample of employees were randomly selected from the organisational structure listing provided at the onset of this audit and are identified by their employee number in the summary table below:

<table><tr><th>Detail</th><th>Qty</th><th>Employee No.</th></tr><tr><td>Contracted</td><td>3</td><td>150 / 53 / 240</td></tr><tr><td>SAMSOA</td><td>3</td><td>122 / 193 / 197</td></tr><tr><td>LGE</td><td>2</td><td>221 / 191</td></tr><tr><td>EBA</td><td>8</td><td>24/49/104/180/224/173/113/211</td></tr><tr><td></td><td>16</td><td></td></tr></table></td><td colspan="3">Detail
There are a total of 76 employees, which has resulted in a 20% testing sample of 16 records.

• the fixed term contracts were reconciled exactly,
• the SAMSOA awards were found to have large pay bands and reference to various levels was more difficult to reconcile, however the individual letters accompanying each staff member, set out pay packages which were then fully reconciled to the payroll system data.
• the LGE award bands were reconciled to the pay levels for the mechanics team.
• the EBA reconciled to all within the drivers' team, with precise reference to the hourly rate.
All testing found the EAs, Awards, Employee Contracts and internal payroll policies to be in place and implemented as required, in a timely and effective manner.

Root Cause: The inherent complexity of maintaining multiple employment instruments within a functioning payroll system.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Unlikley</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>FULLY EFFECTIVE</td><td colspan="3">Control activities deployed through established up-to-date policies that are regularly reviewed.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>2.0</th><th colspan="6">Confirmation of accurate calculation and appropriate implementation across the 2024/25 payroll function</th></tr>
<tr><td>Findings</td><td colspan="3">Summary

A walkthrough test was undertaken on the payroll run of 1st October 2025. In addition, to the above, detailed transaction testing was undertaken across all 26 payroll runs.

Testing reviewed: early starts / overtime / annual leave / personal leave / meal allowances / adjustments for different work patterns ie: study leave, unpaid leave etc.

And with reference to Annual Leave Balances:
Annual leave report run after payroll finalised, this is then imported back into Kronos to provide updated leave balances.
All transactional found to be accurate and timely.

Root Cause: Driver payroll inputs rely on operational verification by the Coordinator Operations before payroll processing and remains dependent on manual checking and key officer availability, creating workload pressure and potential delay risk if operational resourcing is constrained.</td><td colspan="3">Detail

A walkthrough test was undertaken on the payroll run of 1st October 2025.
This allowed for insight into the process; the data held on the Kronos time sheeting system and the interface of this information with the MYOB pay generation system. Levels of process control, data checking and approvals were observed to be good for each staff entry and 100% of timesheets were checked.
Kronos time sheeting is fed by automated logons/logoffs across the yard/offices. These are enabled via computer systems or scanned via staff mobiles. Drivers working hours are verified by the Coordinator Operations and endorsed prior to payroll processing.
In addition, to the above detailed transaction testing was undertaken across all 26 payroll runs.
Four instances were identified where additional supporting information was sought, detailing correcting adjustments for Public Holiday working and a tax adjustment.
Annual leave report run after payroll finalised, this is then imported back into Kronos to provide updated leave balances.

Cover for the payroll process, if the Finance Officer is unavailable, is provided by the Manager HR & FS with approvals and checks being undertaken by Manager Business Services. The Coordinator Operations undertakes backfilling driver roles when staffing levels require it, this may cause delays in timesheet verification/additional checks to be undertaken.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R2.0 Consider implementation of an internal process for confirming key payroll processing data for the team of drivers (to support Coordinator Operations with manual workload)</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Unlikley</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>FULLY EFFECTIVE</td><td colspan="3">Control activities deployed through established up-to-date policies that are regularly reviewed.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">Management will ensure additional controls are implemented, primarily for the payroll officer, to reduce risk of input error into the timekeeping system by Operational staff. Whilst this happens generally it is acknowledged that it is at times ad hoc and a consistent approach will ensure accuracy of data entry. This will be implemented immediately in line with upcoming pay cycle.</td></tr>
<tr><td>Completion Date</td><td colspan="6">12/11/25</td></tr>
</table>

<table>
<tr><th>3.0</th><th colspan="6">Review to ensure completeness of implementation for all related pay agreements, awards, contracts, standards and policies</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
Sample records (24) were checked to the MYOB system.

An initial check was made to the employee data to verify names and payrates.

All records found to be complete and accurate.

Root Cause:. Payroll implementation controls need to be supported by knowledgeable officers, documented source records and constant review of pay-related changes.</td><td colspan="3">Detail
Across the sample, the following were reviewed and tested for completeness of record, accuracy to payrate and

- Implementation of higher duty pay rates,
- Calculations of RDO cash out requests,
- Accuracy of termination payments,
- Backpay calculations following performance reviews,
- Compassionate Leave & Bereavement Leave,
- Updating a new payrate,
- Resignation
- Unpaid leave
A number of calculations were verified with the Finance Officer who was able to demonstrate full knowledge of each instance and provide a complete trail of the calculations.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Unlikley</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>FULLY EFFECTIVE</td><td colspan="3">Control activities deployed through established up-to-date policies that are regularly reviewed.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>4.0</th><th colspan="6">Review of regulated allowances</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
Allowances were noted as payable for the following:
Meal allowance
Licence Allowance
Mobile Phone Allowance
Motor Vehicle Allowance
Root cause: Allowance payments need to be supported by established payroll records and operational data.</td><td colspan="3">Detail
These were witnessed via the walkthrough observations of the payroll process undertaken on 01/10/25 and tested to the standing data held on the relevant MYOB employee records,

Meal allowances are paid to drivers on routes that exceed 8 hours and are logged on the payroll control worksheets from the logging on/off data. These are largely the routes that are out in the Adelaide Hills.

Licence allowances are paid to roles as relevant, eg: the mechanics

Mobile phone allowances are paid to the General Manager, the Manager Human Resources and Financial Services, the Team Leader Customer Services and the Team Leader Workshop.

Motor Vehicle allowance is paid to the Manager Human Resources and Financial Services.

All were found to be recorded accurately and well documented.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Rare</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>FULLY EFFECTIVE</td><td colspan="3">Control activities deployed through established up-to-date policies that are regularly reviewed.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>5.0</th><th colspan="6">Review and testing of system parameters to include rates, allowances & superannuation</th></tr>
<tr><td>Findings</td><td colspan="3">Summary

System parameters were reviewed in detail via a walkthrough with the Manager Human Resources & Financial Services.

There are a number of system parameters updates that the Manager Human Resources and Financial Services can undertake in relation to new pay awards, eg: when new payrates, allowance levels and superannuation percentages are required. These were explained and illustrated.

Root cause: System parameter changes rely on knowledgeable staff logging requests with system administrator(s) and supported by email evidence. There is an underlying risk of dependence on externally administered configuration changes and the need to retain clear evidence of request, testing and approval for each change.</td><td colspan="3">Detail

When a new pay definition is required such as a new pay split of an existing classification or when a new team needs to be set up, the request needs to be logged via the system administrators who will then create the requested new accounts, test for accuracy and then notify that the account is ‘live’.

Screen shots of emails were provided to substantiate how these requests are managed and finalised.

Through discussion it was noted that this process has worked well and suits both the needs of the organisation and the system administrators who support and maintain the system.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Unlikley</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>MOSTLY EFFECTIVE</td><td colspan="3">Control activities deployed through established policies.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>6.0</th><th colspan="6">Reconcile to relevant organisational policy documentation</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
For this payroll audit the relevant organisational policy documentation was taken to be the Leave Policy.

This policy had been recently issued and will be scheduled for review in 2 years’ time.

The policy is the responsibility of the General Manager and provides an overview of the range of leave entitlements, a new and key source of clarification, linking to relevant legislation and citing the LGE, SAMSOA and EBA as relevant documentation.

Root Cause: This policy has a wide range of leave types and the need to ensure policy references, payroll coding and transactional evidence are utilised and retained.</td><td colspan="3">Detail
Policy contents were listed as:

• Annual leave (on a full time basis) is 4 weeks,
• Annual leave loading is referenced to respective awards/agreements or contracts of employment,
• How to take leave and cancel leave are outlined in the body text,
• Reference is made to the management of excessive annual leave,
• Public Holidays and Annual Leave,
• Leave payments
With further details of the various types of leave:
- Personal Leave (Carer’s/Family Leave)
- Compassionate/Bereavement Leave,
- Long Service Leave,
- Unpaid Leave,
- Parental Leave,
- Family and Domestic Leave,
- Other miscellaneous leave – eg: jury service, trade union training or study leave.

The majority of these leave classifications were evident throughout the individual, transactional. testing.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Rare</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>MOSTLY EFFECTIVE</td><td colspan="3">Control activities deployed through established policies</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>7.0</th><th colspan="6">Review consistency of work and undertake payrate comparisons across the organisational structure</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
A consistency and transparency check.

A review was undertaken across the organisation in order to assess consistency of work to pay rate.

Whilst a few instances were found where positions were similarly titled, eg: drivers, coordinators, managers, the detail behind the roles and responsibilities was found to vary.

Root cause: Similarly titled roles are not always directly comparable because duties, routes, work patterns and portfolio responsibilities vary across teams.

This issue arises from operational role design rather than from payroll calculation error.</td><td colspan="3">Detail
For example, amongst the teams of drivers, there were different routes, with pre-allocated locations, the local ones or the more distant Adelaide Hills ones with further distances, increased road hours and therefore meal allowances.

Whilst these teams may be aware of issues within their rounds, it does not reflect as an issue in the payroll testing. All drivers have the same basic pay rate so the only variation would be linked to area allocations. There may be an opportunity to rotate routes.

This audit has raised the profile of transparency and consistency in this regard, and the workplace culture is positive going forward.

At present there are also several coordinator roles and an admin team with similar core duties which may lend themselves to cross skilling.

A review was also undertaken across the managerial posts within the Executive Leadership Team. Having managers on a variety of employment types, fixed term contracts and/or permanent employees does not present an issue as each has their own portfolio and preferences.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R7.0 Consider scheduling an ongoing review of similarly titled positions, eg: coordinator roles, driver roles, to provide an opportunity for cross skilling /experiencing variations and wider skills and knowledge bases.</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Unlikley</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>MOSTLY EFFECTIVE</td><td colspan="3">Control activities generally contribute to risk mitigation.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">Management acknowledges these findings, noting there is some variation in work hours/location, specifically for Drivers. The variations across Leadership and Executive staff are considered not to be material. Management remains engaged with staff and encourages open conversation with employees and where possible will align rostering to employees' personal preferences and circumstances.
The General Manager and Manager HR & Financial Services will schedule an annual review of positions as part of a broader annual Organisational Chart review to ensure consistency and equity across similar titles roles with the first to be undertaken prior to the end of February 2026.</td></tr>
<tr><td>Completion Date</td><td colspan="6">28/02/26</td></tr>
</table>

<table>
<tr><th>8.0</th><th colspan="6">Check the interpretation and calculation of specific payments; termination payments, identified ad hoc payments, back pay and leave cash out payments</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
During the walkthrough testing 01/10/25, a range of payments specific to these areas was witnessed;

• termination payments,
• ad hoc payments,
• back pay and
• leave cash out payments

Root cause: Specific and ad hoc payments are calculated and reviewed with reference to source documentation; the inherent risk is that these payments are less routine and often of higher value and therefore require continued clear calculation evidence and independent review before payment.</td><td colspan="3">Detail
The Finance Officer provided a full explanation of the calculations used, and these calculations are double checked by the Manager Human Resources and Financial Services prior to being paid.

Within a sample of 24 x payroll payments for 2024/25, tested with variations:

• 7 x were related to termination payments,
• 2 x were payments for higher duties
• 6 x were related to backpay calculations
• 2 x RDO cashout

All these calculations were checked to source documentation and input calculations and found to be accurate and fully substantiated.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Unlikley</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>FULLY EFFECTIVE</td><td colspan="3">Control activities deployed through established up-to-date policies that are regularly reviewed.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>9.0</th><th colspan="6">Check that payments to all deduction agencies are completed in a timely and accurate manner</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
A consistency and accuracy check.

This is undertaken as part of the fortnightly payroll function, with all relevant deduction payments made within the payment period terms.

Root Cause: Dependency on established and clear payment processing controls.</td><td colspan="3">Detail
The processes in place for both payroll and accounts payable are streamlined and are overseen by the same team, the Finance Officer and the Manager of Human Resources and Financial Services.

Payment of these deductions was evidenced via the organisations hard copy bank statements.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Unlikley</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>FULLY EFFECTIVE</td><td colspan="3">Control activities actively contribute to risk mitigation.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>10.0</th><th colspan="6">Review of employment contract details with specific focus on contractor/employee status and superannuation arrangements</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
To clarify the status of employee vs contractor / and the superannuation provision for ARC Members. Investigations were undertaken to clarify details for both of these separate issues.
With regard to the superannuation arrangements, further reference was taken via the SALGFMG.
(i) Status of employee vs contractor - two organisational positions were being undertaken by contractors at the time of this audit.
(ii) Superannuation provision for ARC Independent Members - this has been included in this scope in order to clarify the position and the requirements relating to superannuation legislation ie: the Superannuation Guarantee (Administration) Act 1992. This relates to providing superannuation payments for the independent members of the East Waste ARC.
Root Cause: Reliance has been placed on historical interpretations and informal guidance, creating uncertainty regarding both of these issues, which has increased compliance risk despite payroll processes otherwise operating effectively.</td><td colspan="3">Detail
(i) Via discussion with the Manager Human Resources and Financial Services, it was confirmed that one position was in the process of being made an employed position, transferring from a contractor position and relating to the role of ‘education and promotions’.

This has now been confirmed as in place within the organisational structure as of 15/10/25. In reviewing these roles, it is necessary to refer to the context and the indicators that will define whether the role and the person involved can be a contracted position or whether it is in fact an employed position.

In order to facilitate the review of the remaining contracted position, the Executive Administration Officer, there is a completed ATO assessment attached (see Appendix C) which raises the necessary questions and guides the review to a structured outcome for those cases that are less clearly defined.

(ii) At present the SA Local Government Financial Management Group (SALGFMG) are scheduled to have a position on complying with this existing legislation within the next few weeks. It is clear that this will need to be actioned, the expected confirmations will be regarding timeframes and requirement to factor in any backpay.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R10.0 Undertake a review, incorporating the ATO assessment guide, to fully ascertain whether the EA Officer fits the contractor definition.
R10.1 Establish a process for paying ARC independent members superannuation, to be activated once SALGFMG confirm details.</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Possible</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied</td><td>Priority Rating</td><td>HIGH</td></tr>
<tr><td>Management Response</td><td colspan="6">R10.0 Management notes the associated risk and agrees with the recommendation, noting a definitive assessment is required to determine the true nature of the relationship. Management has commenced the process of reviewing the terms of the contractual arrangement and will look to implement a compliant and suitable resolution as soon as practicable.
R10.1 Management will make contact with Independent Committee members to obtain superannuation information and implement a suitable process to make superannuation contributions on behalf of members in line with the next meeting cycle. We will await advice from SALGFMG relating to back payment obligations.</td></tr>
<tr><td>Completion Date</td><td colspan="6">31/12/25</td></tr>
</table>

<table>
<tr><th>11.0</th><th colspan="6">Review payroll system reconciliations for accuracy and timeliness</th></tr>
<tr><td rowspan="1">Findings</td><td colspan="3">Summary

Details of the reconciliation process were provided by the Finance Officer.

The 2024/25 reconciliation covers the YTD, so is an accumulated total and is balanced to screenshots of the relevant ledger codes.

The sum of all payroll credits and debits and a balancing figure being the accumulated balance paid to child support.

Root Cause: Lack of established reconciliation procedures, clear accountability for payroll verification activities and the routine matching of payroll transactions to general ledger balances have created an effective financial control environment.</td><td colspan="3">Detail

Discussions confirmed that regular reconciliations are undertaken, and testing confirmed these are monthly with authorisation evidenced by the Manager of Human Resources and Financial Services.

Testing evidenced the reconciliation for:

- 28/02/25
- 30/06/25

Similar reconciliations are undertaken monthly for superannuation; testing evidenced the respective reconciliations for:

- 31/03/25
- 30/06/25</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Unlikely</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>FULLY EFFECTIVE</td><td colspan="3">Control activities deployed through established up-to-date policies that are regularly reviewed.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

<table>
<tr><th>12.0</th><th colspan="6">Review any recommendations out of the Leave Balances audit and any other related audits</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
Reference was given to a previous ‘Leave Balances’ audit.

The 2023/24 EOFY audit undertaken by Galpins highlighted ‘Management of excessive annual leave balances’.

The annual leave balances have been reviewed for 2024/25 and all fall within the allowed policy position of 8 week maximum balance.

Root Cause: Weak monitoring and administration of annual leave balances as well as poor ongoing oversight and weak controls.</td><td colspan="3">Detail
As a result of this audit focus, the Executive Management Team implemented monthly reviews of annual leave data. Via exception reporting, any excessive balances are managed both from a business continuity and staff wellbeing viewpoint.

Individual staff members may negotiate extended leave arrangements in agreement with management and aligned to business capacity.

Reference:

- 2023/24 EOFY Final Audit
- Annual Leave Policy</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">No additional recommendations</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Unlikely</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>MOSTLY EFFECTIVE</td><td colspan="3">Control activities deployed through established policies.</td><td>Priority Rating</td><td>MODERATE</td></tr>
<tr><td>Management Response</td><td colspan="6">N/A</td></tr>
<tr><td>Completion Date</td><td colspan="6">N/A</td></tr>
</table>

Appendix A – Audit Scope

INTERNAL AUDIT PLAN 2025 - 2027

With assurance, comes agility, flexibility, shape shifting, an ability to seize opportunities and add strategic value.

2025/26	Schedule	Reference	Risk	Report to ARC	Rating/ Source	Detail *Approved - A&RC 18/06/25*
Yr 1/Q1	Sept/Oct	Payroll system (ARC referral)	SR2	Nov-25	ARC	Assurance - Enterprise Agreement to payroll system (as discussed at ARC)

Type

Assurance/Compliance

Strategic Risk

SR2 - Lack of effective governance and decision making process may result in not meeting community/ Member Council expectations, adversely impact East Waste's finances and damage to reputation.

Objective

To review and assess the accuracy, completeness and timeliness of the calculation and implementation of the East Waste 2024/25 payroll function.

Background

- Initially referred by the Audit & Risk Committee (A&RC) following discussion at their April 2025 meeting.
- Further discussion at the A&RC meeting in June 2025 resulted in this audit being scheduled as the first audit of 2025/26 - Year 1 Work Plan.
- Out of session review by the East Waste Audit & Risk Committee in order to finalise the audit scope, enabling on site review to commence early September 2025.

Scope

- Include assessment against Enterprise Agreement, Awards, Employment Contracts, National Employment Standards (NES) and Internal Policies as relevant.
- Confirmation of accurate calculation and appropriate implementation across the 2024/25 payroll function
- Review to ensure completeness of implementation for all related pay agreements, awards, contracts, standards and policies
- Review of regulated allowances
- Review and testing of system parameters - to include rates, allowances & superannuation
- Reconcile to relevant organisational policy documentation
- Review of consistency of work and payrate comparisons for similar positions across the organisational structure
- Check the interpretation and calculation of specific payments were undertaken correctly eg: termination payments/ad hoc payments/ back pay / leave cash out payments
- Check that payments to all deduction agencies are completed in a timely and accurate manner eg; superannuation/child support etc.
- Review of employment contract details with specific focus on contractor/employee status and superannuation arrangements
- Review payroll system reconciliations for accuracy and timeliness
- Review any recommendations out of the Leave Balances audit and any other related audits
- Additional items as may become apparent during testing

Allowances

Potential allowances to include;
-mobile phone
- vehicle
- travel and meals
-first aid
-on call
-tool and clothing
- training

Appendix B – Risk Management

Strategic Risk, Matrix and Risk Tables

	CONSEQUENCE				
LIKELIHOOD	Insignificant	Minor	Moderate	Major	Significant
Certain to occur	High	High	Extreme	Extreme	Extreme
Very likely	Medium	High	High	Extreme	Extreme
Possible	Low	Medium	High	Extreme	Extreme
Unlikely	Low	Low	Medium	High	Extreme
Rare	Low	Low	Medium	High	High

Risk Acceptance Table

RISK RATING	Acceptance Level	Control Level	Monitoring	Reporting
Low	Acceptable	Adequate	Active	Quarterly/Yearly
Moderate	Acceptable	Adequate	Active	Monthly/Quarterly
High	Acceptable is some circumstances	Excellent	Pro-Active	Weekly/Monthly
Extreme	Unacceptable in most circumstances	Excellent	Pro-Active	Daily/Weekly

Consequence Table

	Reputation	Commercial	Business Impact	WHS/ Public Safety	Environment
Insignificant	Public Image: *No adverse effect* Community Concern: *Insignificant* Social Health & Community Wellbeing: *Negligible adverse impact* Impact on established community relationships *Little or no impact*	Effect on Constituent Council Membership: *No change in membership* Effect on East Wast viability as entity: *No effect*	Delay in Undertaking Routine Needs or Tasks *Delay of up to ½ day* Legal Issues *nil*	Injuries *No injuries or no significant injuries* Effect on Property *Negligible loss or damage to property/ infrastructure*	SA EPA Act *'Nuisance' category under Act* Contamination *On-site release immediately remedied* Effect on species/ ecosystems *Slight, quick reversible damage to a few species*
Minor	Public Image: *Kept onsite, no media interest, minor adverse effect* Community Concern: *No community interest* Social Health & Community Wellbeing: *Minor adverse impact* Impact on established community relationships *Minor impact*	Effect on Constituent Council Membership: *Possibility of change in Membership raised* Effect on East Wast viability as entity: *Minor impact able to be addressed by management*	Delay in Undertaking Routine Needs or Tasks *Delay of up to 1 day* Legal Issues *nil*	Injuries *First Aid treatment* Effect on Property *Minor loss or infrastructure damage*	SA EPA Act *'Nuisance' category under Act* Contamination *On-site release remedied without impact on business* Effect on species/ ecosystems *Some minor adverse effects to a few species/ ecosystem parts that are short term and immediately reversible*
Moderate	Public Image: *Local media coverage, moderate adverse effect* Community Concern: *One or two community complaints* Social Health & Community Wellbeing: *Moderately reduced opportunities for participation in community life and/or decision making* Impact on established community relationships *Moderate incidences of increased isolation*	Effect on Constituent Council Membership: *Change of membership by 1 (either gain or loss)* Effect on East Wast viability as entity: *Effect that requires Board attention*	Delay in Undertaking Routine Needs or Tasks *Capability/ service impaired, moderate impact on stakeholders, delay of 1-3 days.* Legal Issues *Minor legal issues, non-compliances and breaches of regulation*	Injuries *Medical treatment required* Effect on Property *Moderate loss/ or infrastructure damage*	SA EPA Act *'Material' category under Act* Contamination *On-site release contained without outside assistance* Effect on species/ ecosystems *Temporary reversible damage, loss of habitat and migration of animal population, plants unable to survive, pollution requires physical removal, land contamination localised and can be quickly remedied.*
Major	Public Image: *State media coverage, interest by Member Councils, interest by regulators, major adverse effect* Community Concern: *Seriously affected by major community unrest* Social Health & Community Wellbeing: *Seriously affected by major community interest* Impact on established community relationships *Significant breakdown*	Effect on Constituent Council Membership: *Change of membership by 2 or more (either gain or loss)* Effect on East Wast viability as entity: *Effect that requires Member Council attention*	Delay in Undertaking Routine Needs or Tasks *Loss of capability, disruption to services, major impact on stakeholders and delay of 3-5 days* Legal Issues *Serious breach of regulation with investigation or report to authority with prosecution and/or moderate fine possible*	Injuries *Serious or extensive injuries* Effect on Property *Serious structural damage to infrastructure or serious loss of assets*	SA EPA Act *'Serious' category under Act* Contamination *Off-site release or spillage With no detrimental outcome* Effect on species/ ecosystems *Death of individual animals, large scale injury, loss of keystone species and widespread habitat destruction.*
Catastrophic	Public Image: *National media coverage, leads to changes at Executive or Board level, loss of key contracts* Community Concern: *Hugely affected by major community unrest* Social Health & Community Wellbeing: *Hugely affected by major community unrest* Impact on established community relationships *Significant breakdown*	Effect on Constituent Council Membership: *Termination of East Waste* Effect on East Wast viability as entity: *Termination of East Waste*	Delay in Undertaking Routine Needs or Tasks *Loss of services and capability, failure to meet stakeholders' needs for more than 5 days. Project & program failure, inability to meet minimum standards, most objectives not met.* Legal Issues *Major breaches of regulation, major litigation*	Injuries *Fatalities* Effect on Property *Critical loss, irreversible damage to property/ infrastructure*	SA EPA Act *'Serious' category under Act* Contamination *Toxic release or major spillage off-site with detrimental effect.* *Permanent and widespread land contamination.* Effect on species/ ecosystems *Death of animals in large numbers, destruction of flora species and irreversible soil erosion or severe compaction, widespread introduction of weeds*

Appendix C – Assessment – Contractor or Employee

Scope of Advice

This opinion addresses tax and superannuation compliance obligations under the Superannuation Guarantee (Administration) Act 1992 (SGAA), the ATO ruling TR 2023/4 and associated ATO guidance.

It does not cover employment law, industrial relations or enforceability of contractual terms beyond their relevance to tax and superannuation obligations.

Issue

East Waste has an engagement letter to provide Administrative Services. The engagement letter is dated 2nd February 2024 for a 12-month term, which has expired.

The question is whether this person is a common-law employee under TR 2023/4.

If not, does East Waste have to pay superannuation under SGAA 12(3)?

Rule

TR 2023/4: The classification of whether a person is an employee or contractor sets out some key factors:

- Integration: Serving in the engagement of the entity's business
- Control and right to control
- Ability to delegate
- Risk
- Tools and equipment
- Payment Basis.

SGAA s12(3): If a contract is wholly or principally for personal labour, non-delegable and not for a result. Superannuation Guarantee applies.

Assessment: Employee or Subcontractor?

Integration

An East Waste employee serves the Authority and is contractually required to perform work as a representative of the Authority. An Independent Contractor provides services to the Authority, but the work is performed to further their own business.

The individual works remotely and has access to the Authority's Computer Systems. The engagement letter specifies that East Waste will supply an outlook email address and other necessary software/licenses to enable the person to operate efficiently and present a professional unified approach from East Waste.

The way email is used, along with the statement in the engagement letter about setting a unified approach from East Waste, indicates an integration into the Authority's business in the manner of an employee.

Control and Right to Control

An employer has the legal right to control how, where and when a worker does their work. An Independent Contractor can choose how, where and when work is done, subject to reasonable direction by the Authority.

The individual is engaged to provide approximately 25 hours of service per month, which may vary according to need. The individual is a sole trader who has other clients and manages work for East Waste, addressing all client needs and priorities.

The responsibilities are specified in the engagement letter, with the expectation that work will be undertaken remotely; however, attendance is compulsory for specified meetings. Aside from attending specified meetings, the individual appears to have control over when work will be undertaken, as long as it falls within the required timeframes. There are no set hours per day.

Although East Waste has some direction of the work undertaken, the individual appears to have significant control over when the work will be carried out.

This could indicate a Contractor relationship.

Ability to Delegate

An employee has limited ability to delegate to other employees and, through procurement and contractual arrangements, limited ability to delegate to subcontractors. An Independent Contractor can freely delegate to their own staff and may also delegate to subcontractors, depending on the contract. An Independent Contractor may still need to inform the Authority of the staff member undertaking the work, ensure local WHS inductions are completed, and confirm the employee's qualifications, but they have the freedom to delegate.

The individual does not have any employees and therefore does not delegate. The engagement letter does not restrict them from delegating.

The fact that the engagement letter does not restrict delegation could indicate the nature of an independent Contractor.

If the Contractor had an employee and was able to delegate to them, this would indicate the nature of an Independent Contractor.

Risk

An employee bears little or no risk sustained in the performance of their work. An Independent Contractor bears commercial risk and responsibility for poor workmanship or injury sustained by any party in the performance of work.

The individual is expected to hold insurance; however, the engagement letter does not specify these requirements, nor does it specify which party is responsible for any risks.

Potential risks are low for this type of work; however, as the engagement letter does not specify the responsibility for risk, including the risk of any personal injuries incurred by the individual while working for the Authority, East Waste could find itself responsible for these risks.

If East Waste is responsible for risks, the nature of the engagement is that of an employee.

Tools and Equipment

In an employment relationship, the Authority provides all or most of the equipment and tools, or if the worker provides tools, they receive an allowance or reimbursement. An Independent Contractor provides all or most of the equipment and tools and does not receive an allowance or reimbursement. The work would involve the use of a substantial item that the Independent Contractor is financially and wholly responsible for.

The individual is required to work remotely and supply their own computer. East Waste supplies an outlook email address and other necessary software licences to undertake the work.

The main equipment consists of a computer and phone, which are supplied and maintained by the individual. This is in the nature of an Independent Contractor.

Payment Basis

An employee is generally paid for hours worked and activities undertaken. An Independent Contractor is paid for a result.
The engagement letter outlines two flat hourly rates, depending on the level of service provided, plus superannuation payments.
The payment appears to be based on hours worked, rather than results, which is the nature of an employee's compensation.

Assessment: Is Council required to pay the Superannuation Guarantee?

East Waste may need to pay the Superannuation Guarantee for a contractor if they are paid mainly for their labour. This means:

- The contact is wholly or principally for their labour
- They are paid for their personal labour and skills
- They must perform the work personally (they cannot delegate)

They must be an individual. Superannuation is not paid to a company, trust or partnership.

The work undertaken in this contract is for labour. There are no current delegations in place. This indicates that the Superannuation Guarantee needs to be paid, regardless of whether the engagement is in the nature of an employment contract or as an independent Contractor.

East Waste is paying superannuation to this individual.

Conclusion

Determining whether someone is an employee or a contractor is not a matter of individual assessment boxes but rather involves examining the contract as a whole.

There is a risk that this individual may be an employee. In any case, there is a strong indication that the Superannuation Guarantee needs to be paid, which is occurring. If East Waste wishes to maintain its Contractor status, some of the contract terms may need to be reviewed.

Disclaimer

This advice has been prepared by UHY Haines Norton, a registered tax agent, for general information purposes only. It addresses tax and superannuation obligations under the Superannuation Guarantee (Administration) Act 1992 and the ATO ruling TR 2023/4 and other ATO guidance.

We are not legal practitioners, and this advice does not constitute legal advice on employment law, industrial relations, or contract enforceability. For matters involving legal interpretation, employment entitlements or contract disputes, we recommend seeking advice from a qualified legal professional.

This advice is based on the information provided and the current ATO as at the date of this Report. Legislative changes or factual variations may alter the conclusions. No responsibility is accepted for actions taken without further consultation.

Sources of Information

The ATO website provides information on this matter. The following link goes to a page on the ATO website.

Difference between employees and independent contractors | Australian Taxation Office

The ATO Ruling TR2023/4 on the Legal Database goes to an ATO public ruling that provides more detail when assessing whether a worker is an employee or contractor.

TR 2023/4 | Legal database

The following link goes to a page on the ATO website that discusses when the Superannuation Guarantee is required to be paid for Independent Contractors.

Super for independent contractors | Australian Taxation Office

Connect to possibility

Let us help you achieve further business success

UHY Haines Norton
Chartered Accountants

25 Peel Street
Adelaide SA 5000
Phone 8110 0999 (office)
Email adelaide@uhyhnadl.com.au

5.2 Internal Audit Result – Business Continuity (Adjourned Item)

Report Author	Acting Manager Business Services
Attachments	A: UHY Haines Norton Internal Audit Report: Business Continuity

Purpose and Context

To provide the Audit & Risk Management Committee (the Committee) with the results of the recent Business Continuity audit undertaken by East Waste's appointed internal auditor's UHY Haines Norton.

Recommendation

The Audit and Risk Management Committee receives and notes the Internal Audit Result: Business Continuity as presented by UHY Haines Norton *(Attachment A, Item 5.2, Audit & Risk Management Committee Meeting, 13 August 2026).*

Strategic Link

Objective 5. Provide Leadership
Strategy 5.4 Quality and transparent Corporate (Governance and Financial) activities.

Background

East Waste's first internal audit cycle commenced 1 July 2025, following the development of a two-year Internal Audit Work Plan that was presented and approved by the Committee at the June 2025 Audit & Risk Management Committee meeting. The Business Continuity audit is the second of three (3) internal audits scheduled to be undertaken in the FY26 year, being:

- Payroll Sept/Oct 2025 (Audit report & recommendations finalised)
- Business Continuity Jan/Feb 2026 (Audit complete & draft report presented)
- Asset Management Apr/May 2026

The Business Continuity audit scope was subsequently presented and accepted by the Committee at the 17 September 2025 Audit & Risk Management Committee Meeting, ahead of the commencement of the audit.

Discussion

The Business Continuity audit was undertaken during March and April 2026, with a representatives from UHY Haines Norton conducting a physical audit onsite at the East Waste depot. The onsite visit coincidently came at a time in which East Waste was experiencing a temporary power outage, multiple truck fires and the emergence of the developing global fuel situation - meaning UHY Haines Norton were able to view practical application of elements from the East Waste Business Continuity approach, which provided for a unique and transparent oversight to East Waste's processes.

The Internal Audit Report prepared by UHY Haines Norton is provided at Attachment A (***refer Attachment A***) for the Committee's reference.

Administration is aware of the need to progress Business Continuity from a skills based reactive model into a documented and upskilled Business process. Whilst the business has evidently handled real world scenarios effectively, the findings of the Audit emphasise the need for East Waste to ensure repeatable and consistent outcomes through improved documentation, training and communication.

Administration is in agreeance with the recommendations and has provided a Management Response, which are detailed within the attached audit report document at Attachment A (***refer Attachment A***).

Administration intends to work through all recommendations during the next 12-months, with key milestones at July and October 2026. With recruitment currently active for a WHS Business Partner, this activity will be given priority focus over coming months. Administration will provide progress updates to the Committee via the newly established Internal Audit Tracking Progress document, which is a standing item on the Agenda.

Representatives from UHY Haines Norton will attend the meeting to answer Committee questions and provide context to the report.

UHY Haines Norton

Internal Audit Report – Business Continuity

East Waste

April 2026

(Re-formatted July 2026)

UHY

Connect to possibility

UHY Haines Norton

Disclaimer: This document is for the exclusive use of the person/entity named on the front of this document ('Recipient'). This document must not be relied upon by any person who is not the Recipient. UHY Haines Norton does not take responsibility for any loss, damage, or injury caused by the use, misuse, or misinterpretation of the information in this document by any person who is not the Recipient. This document may not be reproduced in whole or in part without permission.

Liability limited by a scheme approved under the Australian Professional Standards Legislation.

Lead Report Author: Corinne Garrett

Internal Auditor: Karen Peake

25 Peel Street, Adelaide SA 5000

Tel 08 8110 0999

ABN: 37 223 967 491

Executive Summary

Background

East Waste, the trading name of the Eastern Waste Management Authority, is a regional subsidiary established under Section 43 of the Local Government Act 1999 to provide waste collection services to its Member Councils. The Authority provides services on behalf of its 8 constituent councils, with the nature of services determined by each council to meet local community needs.

In order to deliver these services effectively, East Waste requires efficient processes supported by appropriate documentation, system controls, approval workflows and reconciliation practices.

Diagram 1 – East Waste – service summary

Data Source: East Waste website

Key Risks and Priority Findings

This internal audit reviewed the organisation's Business Continuity practices, including related policies and procedures, required skills and ongoing training, communication processes, website information flows and messaging through to constituent councils.

A recent lapse in the necessary skills and provisions prompted a series of recommendations to be drafted. Once actioned, these recommendations will reinvigorate incident and emergency management, incorporating required responses into daily work practices, keeping both staff and the general public safe and updated, enabling timely and appropriate actions, and providing an efficient and effective return to 'business as usual' following any type of business continuity event.

Overall audit conclusion: Based on the work performed and evidence reviewed, the Business Continuity processes were found to provide moderate assurance in most cases, although there was a lack of evidence in some areas, particularly training and the undertaking of related business continuity exercises.

Documentation was found to be outdated and knowledge of business continuity processes and individual officer responsibilities was not well established, highlighting that the processes require investment of time, skills and resources.

A walkthrough test and discussion at senior management level were the principal areas of fact-finding for this audit and, where relevant, due to the lack of updated information, full testing samples were taken to check workflows and further clarify relevance.

Main findings:

Assurances were based on the samples tested, which highlighted lapsed training, outdated policy documentation and an ineffective control environment. This low level of assurance was acknowledged by senior management during discussions and process walkthroughs.

During this audit, onsite at East Waste, strong commitment was shown to addressing the issues identified. The General Manager will be prioritising business continuity and service resilience issues across the office and depot environment, on both a local and wider state level.

Opportunities were also identified, with the most important relating to:

- additional documentation to be introduced such as reporting templates and checklists, communication plans and weblinks,
- the use of informative posters and toolbox meetings to raise awareness for emergency responses and key officers,
- development of the Emergency Planning Committee to oversee emergency management and incident reporting across the organisation.

Additional priority matters include:

- business continuity links to the ICT Disaster Recovery Plan,
- a strengthening of relations with constituent councils to provide effective communications during and post disruptive events, both locally and statewide,
- regular review and updating of business continuity policy documentation.

Future consideration may be given for widening the range of business continuity exercises to ensure all aspects are considered, once the regular issues have been practised.

Although there is potential for a successful reactive response to any business disruptive event, a more efficient and effective approach is to have practised processes and procedures in place. This will promote resilience across the workplace, support a proactive approach, and increase safety for staff and communities.

This increased resilience will reduce the residual rating across control, safety and reputational risk.

Objective, Scope and Methodology

This assurance audit assessed the ability of the organisation to detect, assess, activate and stand down from a business continuity event. The full audit scope is included at Appendix A.

Audit work included discussions and walkthroughs with the General Manager and the Manager Business Services, in addition to process clarifications, training schedules and skillset evidence as provided by the Risk & WHS Coordinator.

Testing covered the previous twelve months in order to gauge the capacity, capability and relevance of the business continuity function currently in operation.

Note: Testing was evidence-based, full sample sizes, risk-focused and proportionate to East Waste's workforce profile. Findings include root cause commentary and recommendations designed to be practical for the organisational size, resources and operating environment.

Internal Audit Standards and Engagement Basis

This internal audit engagement was conducted as an assurance review of East Waste's business continuity capability and capacity. The review was undertaken using a methodology consistent with recognised internal audit practice and the principles of the Global Internal Audit Standards issued by the Institute of Internal Auditors.

The engagement was designed to provide East Waste and its ARC with assurance over the efficiency and effectiveness of the organisation's business continuity response, skills and training adequacy, policy documentation, community communication, website information flows and provision of timely updates to all stakeholders as required.

The internal audit work was performed independently of the organisation's day-to-day operations. The internal auditors did not undertake management responsibilities, make continuity related responses, participate in any training programs or operate process controls. Responsibility for the design, implementation and operation of business continuity processes and controls remains with East Waste's management.

The audit conclusion is based on interviews, walkthroughs, documentation reviewed, system observations and sample testing performed during the engagement. Internal audit does not provide absolute assurance, and the work performed should not be interpreted as a full re-enactment of a business continuity event and does not guarantee that all errors, exceptions or control weaknesses have been identified.

Findings and recommendations have been prepared to support management action and Audit and Risk Committee (ARC) oversight. Recommendations are intended to strengthen capabilities and maximise capacity to respond as successfully as possible to a business disruption event.

What Matters Most During A Business Continuity Event?

The main requirement for an effective Business Continuity response is the ability to successfully manage a 'disruptive event'. This is less dependent on the nature of the disruption itself, and more dependent on the organisation's ability to:

- rapidly identify that a business continuity response is required and formally activate an appropriate response to it,
- clearly assign responsibility for decision-making, communications and operational coordination,
- maintain timely, accurate and consistent records and communications with staff, constituent councils, contractors and the community, and
- prioritise critical services, restoring them in a structured manner, with an appropriate return to 'business as usual' as soon as possible.

When these actions and processes are well understood, documented and practised, business disruptions can be contained and their impacts lessened.

Internal Audit Observations

The audit observations indicate that East Waste's business continuity management has not been regularly updated and, as a result, is not well embedded amongst relevant officers or staff in general. Communication flows with constituent councils and other key stakeholders are not routinely maintained and may not support the timely and accurate communication of emergency information during and after business continuity events.

- **Executive Management - General Manager** – strategic discussion, finance overview, delegations and reconciliation processes, also HR process inputs, contract updates, new starters and employment changes.
- **Executive Management -Manager Business Services** – walkthrough observations, historic insights.
- **Risk & WHS Coordinator** - via email in relation to business continuity documentation, current processes, staff training, exercises and growth of related skillsets.

The audit noted that the control environment for business continuity is not currently operating effectively. This results from a lack of regular process review and a failure to ensure that individuals retain vital skills and related knowledge. This can readily be addressed through implementation of the identified recommendations.

Internal Audit Methodology

This internal audit was undertaken using a structured, risk-based methodology aligned to the agreed scope of work and the approach set out in the quote. The methodology included five phases: planning, desktop review, fieldwork and testing, analysis of findings, and reporting.

During the planning phase, internal audit confirmed the audit scope, information requirements, key contacts, timing and access arrangements with the organisation and a request list was used to obtain relevant business continuity, incident management, training, communication and website information.

The desktop review considered the frequency and content of business continuity training exercises, any recent business continuity events, either on site or whilst out on the collection rounds. A review was also undertaken of the information flow during an emergency event and the efficiency and effectiveness of updates to key stakeholders and the constituent council community areas.

This review provided the basis for targeted fieldwork, with a complete real-time walkthrough, a minimum of 10% sampling, although 100% sampling was more generally undertaken.

Fieldwork included interviews and process walkthroughs with officers in senior management and email updates from the coordinator of the processes and training within the WHS team.

Reference was made to how the business continuity provision links to ICT and Disaster Recovery planning, and how that is supported. Additional discussion was undertaken to understand the responses required at a localised depot level and alternatively, to a high level statewide reaction.

Substantive testing was performed on selected documentation, including framework documentation and related templates, the specific use of each template, any gaps in the documentation, records management and documentation review, webpages and links to constituent councils' webpages and Emergency Planning Committee Minutes.

Findings were assessed against the organisation's risk management framework, the control effectiveness ratings used in this report and the potential impact on business continuity efficiency and effectiveness. Recommendations were developed to be practical for the organisation's size, available resources and current emergency management response capacity.

Testing Approach and Sample Basis

The audit testing was performed on a walkthrough/interview basis and was not designed to re-perform any incidents or exercises. Sample selection was not used as the purpose was a focused process overview, as identified during the scoping and audit planning stage. It centred predominantly on senior management discussion and review of process documentation.

Summary of Testing and Significant Observations

The testing undertaken was initially based on discussions held during March/April 2026 whilst visiting the organisation's Ottoway offices.

Additional areas were then tested to establish how recently processes had actively been in place, and research was undertaken to provide appropriate templates and supporting guidance with a view of assisting East Waste in reinvigorating and revising tools, templates and reference materials in areas where data had either lapsed or become outdated.

- **Policy position –** This audit found that there is currently no Business Continuity Policy in place. A draft template has been provided to assist with getting this documentation updated and fit for purpose.
- **Framework And Plan -** There is a Business Continuity Framework and Plan in place, however it is from 2015 and outdated given that the COVID pandemic impacted in 2020/21. In essence, the majority of the Framework remains relevant, however is in need of an obvious update.

  The Plan was initially linked to the Framework. However, as it supports the actions and responses needed during a Business Continuity event, it is important that the Plan remains updated as a 'living document' and is familiar, visible and easy to follow.
- **Training Materials** - A series of A3 one-page posters to be considered to familiarise all staff as to the steps required during a Business Continuity event, much the same as the established Emergency Management processes. Identifying and de-mystifying the processes required with clear reference to any 'out of hours actions'.
- **Communications Plan** – This needs to be drafted with pre-approved scripts to assist with media and social updates during a Business Continuity event. Whilst it is not possible to foresee pre-approved scripts for all events, a general template with a website/email/social media version can be drafted with a calming, informative tone so that updates can be issued even in the event of key personnel being unavailable/non-contactable.
- **East Waste website** – A Business Continuity/Emergency Management webpage should be provided for those residents who use this means of communication. This can then be promoted as a communication channel to provide 'real-time' updates and to relieve the call volume via the customer service phone lines.
- **Constituent Councils** - A 'hot list' of key contacts, to remain updated and allow for major updates to be cascaded up or down to ensure all relevant players are kept 'in the loop' whilst the business continuity event is being resolved. Also enabling a 'return to normal business' update to be issue in a timely and accurate manner.
- **Awareness/Training** – As the East Waste organisation does not have a large workforce, all staff should have Business Continuity awareness training. Additional focus for those who undertake key roles such as the Executive Management Team, specialist staff members such as Risk & WHS Coordinator, Communications staff, customer services staff and those liaising with constituent Councils.
- **Emergency Planning Committee** – This is a key committee and will provide a solid basis for Business Continuity information and updates across the member councils in the event of a Business Continuity event. All EPC members need to be contactable and have a reliable network, enabling emergency communications and assistance when required.

Table 1: Summary of Audit Testing

#	Working Paper Reference	Recommend-ations	Risk Rating	Effectiveness Rating	Priority Rating
1	Policy /Framework/Plan / Business Impact Assessment – are in place and consistent across the organisation.	3	MEDIUM	PARTIALLY EFFFECTIVE	HIGH
2	Review the Response to Local Incidents, the Incident Management roles are identified and that staff have undertaken appropriate training.	3	MEDIUM	PARTIALLY EFFFECTIVE	HIGH
3	Response to More Widespread Incident, the Incident Management roles are identified and that staff have undertaken appropriate training.	2	MEDIUM	PARTIALLY EFFFECTIVE	MODERATE
4	Review the level of Business Continuity communication with constituent Councils.	3	MEDIUM	PARTIALLY EFFFECTIVE	HIGH
5	Review the level of Business Continuity communication with key third party contractors/ suppliers.	2	MEDIUM	PARTIALLY EFFFECTIVE	MODERATE
6	Assessment of Links to the IT Provision and Disaster Recovery Plan at East Waste.	3	LOW	PARTIALLY EFFFECTIVE	LOW
7	Business Continuity detailed in Organisational Risk Registers.	3	MEDIUM	PARTIALLY EFFFECTIVE	HIGH
8	Assessment of recent Business Continuity Response/Recovery Exercises and Lessons Learnt in the Debrief.	3	HIGH	INEFFECTIVE	HIGH
9	Corporate Business Continuity Training and Resources in Place.	2	HIGH	INEFFECTIVE	HIGH
10	Review that Business Continuity and Workplace Emergency Management Plans are in Place and Reviewed.	4	MEDIUM	PARTIALLY EFFFECTIVE	HIGH

Risk Management – Risk Rating

East Waste's Strategic Risk Register includes one risk with alignment to the business continuity function:

Table 2: Strategic Risk Data

#	Risk	Risk Category	Inherent Risk Rating	Current Risk Rating	Residual Risk Rating
SR7	***A significant unplanned/emergency /adverse event may prevent East Waste from delivering key services/functions (e.g. fire, natural disaster, pandemic)***		EXTREME	HIGH	HIGH

The issues relating to business continuity, the incident management processes, response protocols and impacts as recognised in the findings and recommendations, indicate that business continuity controls were in place, however, are no longer operating well. As SR7 is currently rated '**HIGH**' at both current and residual risk level, this aligns with business continuity audit findings, supporting the need for a review of robust actions as outlined within this report.

This will in turn, further strengthen key operational skills throughout the organisation, and provide confidence in the workforce's ability to respond effectively and efficiently, returning to 'business as usual' as soon as possible.

Risk Management – Effectiveness Rating

East Waste's Risk Management Framework requires periodic review of risk management policies, systems and procedures to evaluate whether controls remain effective and suitable for supporting strategic and operational objectives.

For the business continuity function, the audit found that the practical controls, the policy, framework and processes had become overdue, outdated and ineffective. Emergency response knowledge and specialised training had not been updated and links with constituent councils would not be guaranteed to provide additional resilience or resources in the event of a business disruptive event. Reliance would be on a few individuals rather than a recognised and practised response.

On this basis, the business continuity control environment should be viewed as '**PARTIALLY EFFECTIVE**' with identified policy and processes requiring additional actions as outlined in the recommendations.

Table 3: Risk Management – Operating Effectiveness Ratings

FULLY EFFECTIVE	*- Control activities deployed through established up-to-date policies that are regularly reviewed.* *- Control activities actively contribute to risk mitigation.* *- Technology controls are aligned to the achievement of objectives.*
MOSTLY EFFECTIVE	*- Control activities deployed through established policies.* *- Control activities generally contribute to risk mitigation.*
PARTIALLY EFFECTIVE	***- Control activities may be deployed through established policies which may not be reviewed and up-to-date.*** *- Control activities may contribute to risk mitigation.*
INEFFECTIVE	*- Control activities deployment through established policies is suboptimal.* *- Control activities contributing to risk management are suboptimal.*

Source: COSO Internal Control Framework 2013

Conclusion

Based on the work performed and evidence reviewed, this internal audit provides '**LIMITED to MODERATE'** assurance with regard to the Business Continuity processes in place at East Waste.

- The risk environment is assessed as 'high', in alignment with the current and residual risk ratings in the organisational strategic risk register.
- The overall effectiveness of the business continuity and emergency management control environment was assessed as 'partially effective', with targeted improvements required in updating policy documentation, raising awareness and prioritising training in order to effectively manage the safety of all during an emergency.

The audit;

- identified a need to prioritise improvements across the business continuity environment,
- found evidence of outdated and lapsed documentation and processes which will need to be addressed as a priority,
- proposes that training and organisational awareness are scheduled to instil the skills required for efficient business continuity responses and to incorporate these processes into daily operations,
- highlights the need to address timely and accurate communications between key stakeholders during the incident management stage and the after stages, with confirmation that services have been returned to 'business as usual'.

The implementation of the identified recommendations will reinvigorate the business continuity and incident management processes as these were in place previously and now need prioritisation to regain the level of responses expected by the community from a key service provider.

We acknowledge the assistance provided by officers during the audit, including senior management discussion, with strategic insights, plans for future training provisions and recognition of the need to reinvigorate these key skills and communication flows.

Summary of Key Findings and Recommendations

Key: ***R= Risk Rating, E = Effectiveness, P = Priority***

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
1.0 Policy / Framework / Plan / Business Impact Assessment – are in place and consistent across the organisation.						
MEDIUM	PARTIALLY EFFECTIVE	HIGH	**Policy** East Waste currently has no Business Continuity Policy in place. **Framework & Plan** There is a Business Continuity Framework and Plan which was introduced in 2015, however has not been updated in recent years. It was confirmed, via discussion with the General Manager and Manager Business Services (March 2026), that Business Continuity has been managed in more of a reactive manner, with the sole aim of returning to operational status as soon as possible. There was no evidence of a defined 'Business Continuity' process or structured response, no specific tools or templates have been created, and no Business Impact Assessment has been undertaken.	**R1.1** – Draft a Business Continuity Policy in order to set the policy position for the organisation with regard to the management of Business Continuity events. **R1.2** – Review the Business Continuity Framework (as a separate document) to ensure it is updated to the business needs in order to support the policy position. **R1.3** – Review the Business Continuity Plan (as a separate document) to incorporate updated operational information and key templates to aid response and recovery and become a 'living document'.	**Administration has developed an improved draft BCP. The revised draft incorporated ISO22301 consideration and is designed to capture key items flagged through the three document approach. Feedback from LGRS/JLTA has been requested.**	**30 Sep 2026**
2.0 Review the Response to Local Incidents, the Incident Management roles are identified and that staff have undertaken appropriate training.						
MEDIUM	PARTIALLY EFFECTIVE	HIGH	**Local Incidents** East Waste has recently dealt with a number of disruptive business events impacting on the waste management business locally. **Identification of Incident Management Roles** During any locally based 'business disruptive events', the General Manager and Executive Management Team take on the roles of 'incident management team' – although this is not formally detailed. The events listed above were managed to a workable outcome, causing a distraction from daily work operations to concentrate on a resolution and then resuming 'business as usual'. **Appropriate Training** Incident management and/or business continuity training has not been undertaken over the last 12–18 months. **Note:** An example of an A3 info-sheet is shown as Diagram 4 – presenting 'critical service recovery' information in easily read/understood format.	**R2.1** - Develop tools (checklists, contact lists, posters incident management and reporting templates - SITREPs etc) to prompt required actions in the event of local disruptive incidents. **R2.2** - Formally identify staff members as part of the Incident Management Team, display IMT details at vantage points around the work site and offices to aid identification of individuals. **R2.3** - Ensure constituent councils provide contact information and that this is updated at least six monthly via a standing agenda item on the WHS Committee.	**The improved draft BCP incorporates a contract directory, event log, and templates to support operational usage. Roles are identified and scenario application is referenced. Further engagement from Constituent Councils is to be sought.**	**30 Sep 2026**

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
3.0 Response to More Widespread Incident, the Incident Management roles are identified and that staff have undertaken appropriate training.						
MEDIUM	PARTIALLY EFFECTIVE	MODERATE	**More Widespread Incidents** Business disruptive events impacting on a wider scale such as bushfires, flooding and pandemics amongst others, require specific training and established communication channels. In the event of a more widespread disruptive impact, greater coordination and communication will need to be enacted. **Identification of Incident Management Roles** During more widely based 'business disruptive events' the General Manager and Executive Management Team take on the roles of 'incident management team' – although this is not formally detailed. The events listed above were managed to a workable outcome, causing a distraction from daily work operations to concentrate on a resolution and then resuming 'business as usual'.	**R3.1** - Develop relationships with constituent councils Emergency Response teams and/or relevant Zone Emergency Management Committees to ensure ease of contact in the event of an emergency/business disruptive event that cuts across boundaries/affects larger areas. **R3.2** - Investigate ways to strengthen relationships across the customer service, communications and emergency response teams within each of the constituent councils and undertake regular contact/update sessions.	**Engagement with Constituent Councils has commenced at the WHS level. Direct contact with CEOs has also been made to identify the desire to align and share BCP approach and considerations.**	**30 Sep 2026**
4.0 Review the level of Business Continuity communication with constituent Councils.						
MEDIUM	PARTIALLY EFFECTIVE	HIGH	**Business Continuity Communication Plan** Currently there is no specific Communications Plan, either outlined within the Business Continuity Plan or as a standalone document. During recent business disruptive events (truck fires, loss of key staff, internet outage, fuel shortages etc), organisational responses have been managed in an ad hoc manner, with instructions relayed via the management team at East Waste. For communications during a business disruptive event, it would be more appropriate to operate to a communications plan, with a selection of pre-approved scripts and trained individuals in key positions.	**R4.1** – Draft a Business Continuity Communications Plan **R4.2** – Draft pre-approved scripts for internal and external updates, for emails and websites and SMS updates to staff. **R4.3** – Include the use of these scripts in training/toolbox exercises to ensure they are embedded within internal practices.	**Communication plan is included in the revised draft BCP. Further work will be conducted to create scripts and share with the teams.**	**30 Sep 2026**
5.0 Review the level of Business Continuity communication with key third party contractors/ suppliers.						
MEDIUM	PARTIALLY EFFECTIVE	MODERATE	**Key Third Party Contractors/Suppliers** There are a number of key contractors supporting daily operations at East Waste due to it being a small/medium sized operational team. These third party contractors/suppliers include IT providers/ telemetry system providers/ site security/waste vehicle recovery/ labour provision/training provision/diagnostic machine testing and calibration as well as others.	**R5.1** – When reviewing (& then periodically updating) the Business Continuity Plan, ensure the list of third party contractors/ suppliers is current and includes key contact details and any other relevant information. **R5.2** – Consider drafting service level agreements or clarify via an 'updating statement' to each major contractor/ supplier what might be needed should a business 'disruptive event' occur. (eg: IT DRP details/ telephony back up plans / provision of temporary vehicles /alternative site(s) to deliver waste loads).	**Administration will action these recommendations and include key third party contractors including key roles and expectations.**	**31 OCt 2026**

<table>
<tr><th>R</th><th>E</th><th>P</th><th>Summary Findings</th><th>Recommendations</th><th>Management Response</th><th>Target Date</th></tr>
<tr><td colspan="7">6.0 Assessment of Links to the IT Provision and Disaster Recovery Plan at East Waste.</td></tr>
<tr><td>LOW</td><td>PARTIALLY EFFECTIVE</td><td>LOW</td><td>IT Disaster Recovery Plan
When discussing IT disaster recovery, it was confirmed that at the moment there is no up-to-date IT Disaster Recovery Plan in place. Any IT related issues are reported to the external service provider and dealt with on an ad hoc basis, dictated by the urgency of the situation.
Business Continuity vs Business Resilience
In relation to the IT service provision and IT reinstatement following an outage, whilst onsite during March 2026 the offices were subject to an internet outage. This is recognised as not being an IT service outage, however, the situation was managed well by various staff members who continued by hot-spotting via the data provisions on their mobile phones. This manual workaround remained in place for the majority of the working day, a measure which was key as the payroll needed to be processed to the bank by close of business!
Business Impact Assessment – links to IT Disaster Recovery Plan
East Waste has not undertaken a Business Impact Assessment.
Note: A Business Impact Assessment template has been drafted for the management team at East Waste to work through when appropriate.</td><td>R6.1 – Undertake a Business Impact Assessment to capture all the IT systems currently in use at East Waste and assign them a priority rating.
R6.2 – Liaise with the IT external provider to draft an accurate and updated IT Disaster Recovery Plan (IT DRP), addressing the priorities as ranked in the Business Impact Assessment. (see R6.1)
R6.3 – Manager Business Services to schedule a desktop exercise to include IT failures and telephony system outages to raise Business Continuity awareness amongst admin based staff, with outcome of the desktop exercise to be used as a training resource.</td><td>Administration conducted a cyber desktop scenario led by Marsh, via LGRS.
Administration will utilise the feedback of this activity in conjunction with these recommendations to add to the BCP draft.</td><td>31 Oct 2026</td></tr>
<tr><td colspan="7">7.0 Business Continuity detailed in Organisational Risk Registers.</td></tr>
<tr><td>MEDIUM</td><td>PARTIALLY EFFECTIVE</td><td>HIGH</td><td>East Waste Strategic Risk Register
The Strategic Risk Register at East Waste was provided as an initial source document when undertaking the Assurance Mapping during 2025. This mapping then informed the Internal Audit workplan 2025 – 2027.
There are currently 10 strategic risks listed, including one relating to Business Continuity:
SR7: A significant, unplanned/emergency/adverse event may prevent East Waste from delivering key services/functions (eg: fire, natural disaster, pandemic)
This risk was updated to the register in July 2023 and has a full list of causes including pandemic, fire onsite, lack of BCP and/or BCP training, drivers' strike, no emergency management in place, bushfire in commuter zones, lack of staff who have BCP experience/training, non-defined staff responsibilities.
Several of the above causes relate to the provision of plans and training which are addressed on Worksheet 9.0
The current risk rating for SR7 remains assessed as High, which reflects the reliance on informal processes, limited documentation and the lapsed training and exercises.</td><td>R7.1 – Review the controls listed against SR7 on the Strategic Risk Register to ensure all are current, addressing any that have lapsed as a priority.
R7.2 – Review the Additional Controls cited to ensure all related actions have been completed or are completed as a priority.
R7.3 - Ensure Business Continuity exercises and related documentation are updated to the controls listed once undertaken.

Inherent: Extreme
Current: High
Forecast: High</td><td>Administration will undertake this activity and update the BCP accordingly.</td><td>31 Oct 2026</td></tr>
</table>

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
8.0 Assessment of recent Business Continuity Response/Recovery Exercises and Lessons Learnt in the Debrief.						
HIGH	INEFFECTIVE	HIGH	**Recent Business Continuity Response/Recovery Exercises** During the period of this audit scope, the last 12-18 months, there have been no structured Business Continuity Response or Recovery exercises. The current Business Continuity Framework and Plan outlines an organisational commitment to annually test the plan and to maintain updates to staff contact lists, however this has lapsed. **Framework and Plan Review** East Waste have a Business Continuity Framework and Plan dated 2015 – pre-Covid and over ten years old. This framework and plan have been referenced during this audit and much of the text remains relevant, so the format is accepted as a good basis for review and update. **Lessons Learnt and Debrief Process** There have been learnings from recent business disruptions, however the Business Continuity Framework and Plan were not referenced, preferring to deal with each incident in real time with managerial resources and experience already in place. There was no evidence of a defined 'Business Continuity' process or structured response, no specific tools or templates have been created and no business impact assessment undertaken. Response to Business Continuity events has been by the management team and workers with extensive knowledge of the business.	**R8.1** – Raise awareness across the organisation for Business Continuity, the documentation, the key staff and the aim of returning to 'business as usual' as promptly as possible. **R8.2** – Ensure debriefs are held to consolidate learnings, check on staff well-being, record outcomes and ensure a maturing of Business Continuity knowledge across the organisation. **R8.3** – Create a series one-page A3 poster format displays to provide another means of raising awareness, clearly presenting Business Continuity information, eg: the responses requiring activation of the Business Continuity Plan, when and how these responses should be activated and what key actions should be undertaken including post event debriefs	**Administration has commenced broader team engagement through Toolbox with all staff and through the WHS Committee. Generation of one page posters will be generated and placed in relevant work areas.**	**31 Oct 2026**
9.0 Corporate Business Continuity Training and Resources in Place.						
HIGH	INEFFECTIVE	HIGH	**Business Continuity Training** Through discussion with the General Manager, it was noted that there had been no recent Business Continuity training, no formal exercising and no review, although there was acknowledgment of the Business Continuity Framework and Plan 2015. Recent risk related work undertaken with the LGRS has resulted in an updated Training Needs Analysis (TNA) which outlines roles requiring Business Continuity and related emergency management training, as well as Emergency Planning Committee training. Once this is executed, the level of awareness will improve across the organisation.	**R9.1** – Develop a series of templates and pre-approved scripts for internal and external updates, via email, websites and social media updates in order for East Waste to review and modify as needed for their organisation and operations.	**Scripts will be created to support likely BCP scenarios.**	**31 Oct 2026**

R	E	P	Summary Findings	Recommendations	Management Response	Target Date
9.0 Corporate Business Continuity Training and Resources in Place (cont'd).						
HIGH	INEFFECTIVE	HIGH	Business Continuity Resources in Place Business Continuity resources are minimal at present, and in need of review as they date back to 2015. It has been noted previously in this report that the Framework and the Plan should be split in order to maximise the usefulness of both and to ensure that the Plan section is kept updated in real time, with regular reviews of contact names and numbers and protocols as data can quickly become obsolete	**R9.2** – Schedule regular Business Continuity training as per the renewed TNA and consider inviting members from the constituent member councils when/where appropriate as a networking opportunity.	**Administration will schedule training and refresher activities through Skytrust, our safety management program.**	**31 Oct 2026**
10.0 Review that Business Continuity and Workplace Emergency Management Plans are in Place and Reviewed.						
MEDIUM	PARTIALLY EFFECTIVE	HIGH	Emergency Management reports through to the Health and Safety Committee via the Emergency Planning Committee where relevant. The establishment of an Emergency Planning Committee is referenced in the Business Continuity Framework & Plan 2015; however, there are currently no available minutes from the Emergency Management Planning Committee for the last 12–18 month period. There is a standing EPC update on the Health & Safety (H&S) Committee agenda. This Committee should sit at least once annually, more practicably meetings are every six months. **Note: A draft Terms of Reference has been provided to ensure that when this Committee is re-invigorated, all key elements are covered.**	**R10.1 –** Formally review the Emergency Planning Committee (EPC) and ensure membership includes representation from each constituent council, as well as key specialists from within East Waste itself. **R10.2 –** Set two meeting dates per year (six monthly and 2 weeks prior to a H&S Committee date) to ensure issues can be presented and reported immediately through to the H&S Committee for discussion and/or actioning. **R10.3 –** Review the Terms of Reference for the EPC to clarify the remit of the EPC, its scope, and the need to present EPC Minutes to the following H&S Committee. **R10.4 –** Draft and approve an annual workplan to enable the required emergency management related actions to be undertaken in the time between meetings.	**Administration will undertake a review of the EPC and action the recommendations.**	**31 Dec 2026**

Detailed Findings and Recommendations

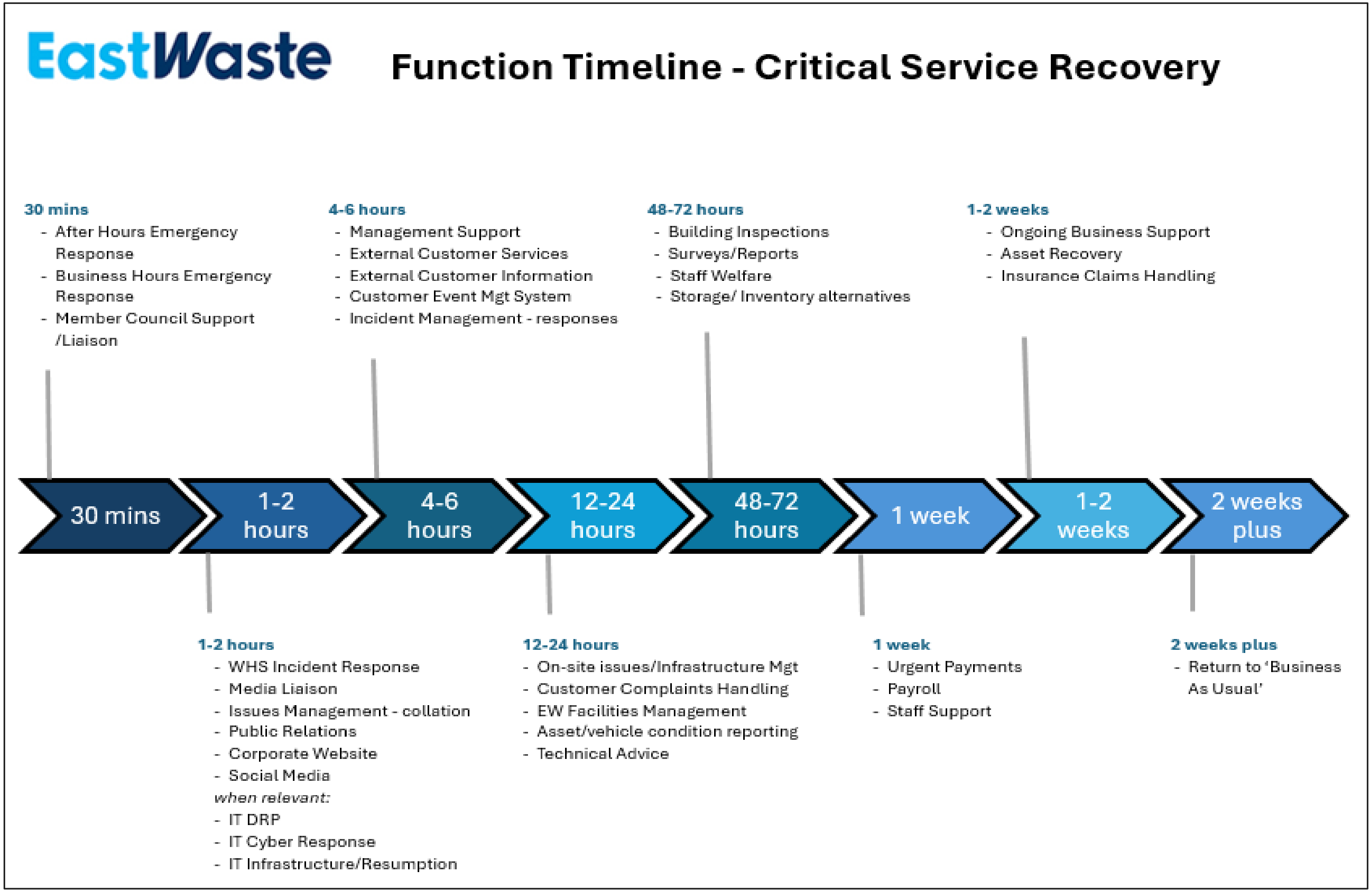
<table>
<tr><td>1.0</td><td colspan="6">Policy / Framework / Plan / Business Impact Assessment – are in place and consistent across the organisation</td></tr>
<tr><td>Findings</td><td colspan="3">Summary
Policy
East Waste currently has no Business Continuity Policy in place.
Framework & Plan
There is a Business Continuity Framework and Plan which was introduced in 2015, however has not been updated in recent years.
It was confirmed, via discussion with the General Manager and Manager Business Services (March 2026), that Business Continuity has been managed in more of a reactive manner, with the sole aim of returning to operational status as soon as possible.
There was no evidence of a defined ‘Business Continuity’ process or structured response, no specific tools or templates have been created, and no Business Impact Assessment has been undertaken.

Root Cause: Business Continuity documentation is outdated and no longer fully supports the training and processes required.</td><td colspan="3">Detail
Framework & Plan
Response to Business Continuity events has been by the management team and key workers with extensive knowledge of the business. Provision needs to be put in place for responses to be supported by knowledge /awareness /trained individuals in recognised BC roles /bespoke documentation /pre-approved scripts and regular exercises.
It was agreed that the Business Continuity Framework and Plan become two separate documents to enable the Framework to support the policy position and the Plan to become a ‘living document’, with additional templates to guide and support actions required during and following a business continuity event.
Review via the Emergency Planning Committee and/or WHS Committee
The Emergency Planning Committee does not have minutes relating to this subject over the last 12–18 months, does not have an annual workplan, and is not currently evidenced as reporting through the Work Health and Safety Committee.
Current Business Continuity Management
Current Business Continuity practices are those embedded largely as a result of operating through the COVID pandemic of 2020 and have been managed in a reactive manner since then.
Over the last 6–8 months ‘business disruptive events’ experienced at East Waste have included;
- truck fires (3 occasions), / internet outages, / loss of key staff,
- fuel crisis (resulting from the Middle East conflict),

Need to be able to keep and maintain the BC Plan as a ‘living document’
Reference to the Business Impact Assessment has been included Worksheet 6.0</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R1.1 – Draft a Business Continuity Policy in order to set the policy position for the organisation with regard to the management of Business Continuity events.
R1.2 – Review the Business Continuity Framework (as a separate document) to ensure it is updated to the business needs in order to support the policy position.
R1.3 – Review the Business Continuity Plan (as a separate document) to incorporate updated operational information and key templates to aid response and recovery and</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Possible</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied</td><td>Priority Rating</td><td>HIGH</td></tr>
<tr><td>Management Response</td><td colspan="6">Administration has developed an improved draft BCP. The revised draft incorporated ISO22301 consideration and is designed to capture key items flagged through the three document approach. Feedback from LGRS/JLTA has been requested.</td></tr>
<tr><td>Completion Date</td><td colspan="6">30 Sep 2026</td></tr>
</table>

<table>
<tr><th>2.0</th><th colspan="6">Review the response to Local Incidents, the Incident Management roles are identified and that staff have undertaken appropriate training</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
Local Incidents
East Waste has recently dealt with a number of disruptive business events impacting on the waste management business locally.
Identification of Incident Management Roles
During any locally based ‘business disruptive events’, the General Manager and Executive Management Team take on the roles of ‘incident management team’ – although this is not formally detailed. The events listed above were managed to a workable outcome, causing a distraction from daily work operations to concentrate on a resolution and then resuming ‘business as usual’.
Appropriate Training
Incident management and/or business continuity training has not been undertaken over the last 12–18 months.
Note: An example of an A3 info-sheet is shown as Diagram 4 – presenting ‘critical service recovery’ information in easily read/understood format.
Root Cause: Local disruptive incidents have been managed through informal management judgement and staff experience rather than a formally documented incident management structure.</td><td colspan="3">Detail
Local Incidents
Following on from the learnings of the pandemic back in 2020-2021, East Waste has also experienced a number of locally based ‘business disruptive’ events, such as;
i. a complete internet outage impacting operational functions at the office – admin/telephones/payroll processing and other routine processes (March 2026)
ii. a number of fires experienced in the back of the refuse vehicles, necessitating ejection into the street once cleared with the relevant Council
iii. a loss of key staff/personnel, following the departure of the WHS & Risk Coordinator within the last few weeks and the backfilling undertaken over the last twelve months whilst a new General Manager was sought and recruited.
iv. the recent fuel shortages/fuel price increases resulting from conflicts in the Middle East, causing financial impacts and uncertainties for service delivery.
Identification of Incident Management Roles
Incident Management roles are not explicitly detailed in position descriptions; however, the management team are assumed to act as the ‘Incident Management Team’ when required. Additional staff members however may not be formally aware of the extra roles they may need to perform; therefore, these should be added to all relevant position descriptions eg: workshop staff/First Aiders/Emergency Wardens and other key officers as relevant.
Appropriate Training
Local incident training needs to be organised in order to increase awareness and ensure appropriate reactions and efficient return to normal business service delivery.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R2.1 - Develop tools (checklists, contact lists, posters incident management and reporting templates - SITREPs etc) to prompt required actions in the event of local disruptive incidents.
R2.2 - Formally identify staff members as part of the Incident Management Team, display IMT details at vantage points around the work site and offices to aid identification of individuals.
R2.3 - Ensure constituent councils provide their contact information and that this is updated at least six monthly via a standing agenda item on the Emergency Planning</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Unlikely</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied</td><td>Priority Rating</td><td>HIGH</td></tr>
<tr><td>Management Response</td><td colspan="6">The improved draft BCP incorporates a contract directory, event log, and templates to support operational usage. Roles are identified and scenario application is referenced. Further engagement from Constituent Councils is to be sought.</td></tr>
<tr><td>Completion Date</td><td colspan="6">30 Sep 2026</td></tr>
</table>

Diagram 4 – Poster Example - Function Timeline – Critical Service Recovery



<table>
<tr><th>3.0</th><th colspan="6">Response to more widespread Incident, the Incident Management roles are identified and that staff have undertaken appropriate training</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
More Widespread Incidents
Business disruptive events impacting on a wider scale such as bushfires, flooding and pandemics amongst others, require specific training and established communication channels.
In the event of a more widespread disruptive impact, greater coordination and communication will need to be enacted.
Identification of Incident Management Roles
During more widely based ‘business disruptive events’ the General Manager and Executive Management Team take on the roles of ‘incident management team’ – although this is not formally detailed.
The events listed above were managed to a workable outcome, causing a distraction from daily work operations to concentrate on a resolution and then resuming ‘business as usual’.
Root Cause: Arrangements for responding to more widespread business disruptive events have not been formally defined, tested or embedded across East Waste and its external emergency management networks.</td><td colspan="3">Detail
More Widespread Incidents
The Business Continuity Plan will provide a stepped up response, more appropriate for liaising when the lead agency dealing with events that may well have a lead agency within SAPOL, SES or MFS
Identification of Incident Management Roles
Incident Management roles are not explicitly detailed in position descriptions, however the management team are assumed to act as the ‘Incident Management Team’ when required.
Additional staff members however may not be formally aware of the extra roles they may need to perform, therefore these should be added to all relevant position descriptions eg: workshop staff/First Aiders/Emergency Wardens and other key officers as relevant.
Appropriate Training – as above
Incident management and/or business continuity training has not been undertaken over the last 12-18 months.
More extensive training needs to be organised in order to increase awareness and ensure appropriate reactions when faced with disruptions to services from incidents such as flash flooding, impeding bushfire threats, cyber-attacks or whole business area power outages.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R3.1 - Develop relationships with constituent councils Emergency Response teams and/or relevant Zone Emergency Management Committees to ensure ease of contact in the event of an emergency/business disruptive event that cuts across boundaries/affects larger areas.
R3.2 - Investigate ways to strengthen relationships across the customer service, communications and emergency response teams within each of the constituent councils and undertake regular contact/update sessions.</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Unlikely</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied</td><td>Priority Rating</td><td>MODERATE</td></tr>
<tr><td>Management Response</td><td colspan="6">Engagement with Constituent Councils has commenced at the WHS level. Direct contact with CEOs has also been made to identify the desire to align and share BCP approach and considerations.</td></tr>
<tr><td>Completion Date</td><td colspan="6">30 Sep 2026</td></tr>
</table>

<table>
<tr><td>4.0</td><td colspan="6">Review the level of Business Continuity communication with constituent Councils</td></tr>
<tr><td>Findings</td><td colspan="3">Summary
Business Continuity Communication Plan
Currently there is no specific Communications Plan, either outlined within the Business Continuity Plan or as a standalone document. During recent business disruptive events (truck fires, loss of key staff, internet outage, fuel shortages etc), organisational responses have been managed in an ad hoc manner, with instructions relayed via the management team at East Waste.
For communications during a business disruptive event, it would be more appropriate to operate to a communications plan, with a selection of pre-approved scripts and trained individuals in key positions.

Root Cause: Business continuity communication arrangements with constituent councils have not been formally documented, allocated or tested. In the absence of a dedicated communications plan, updates during disruptive events have relied on ad hoc management direction rather than a structured communication process.</td><td colspan="3">Detail
Services to Constituent Councils
There are 8 constituent councils serviced by East Waste:
- Adelaide Hills
- City of Burnside
- Campbelltown City Council
- City of Mitcham
- City of Norwood, Payneham & St Peters
- City of Prospect
- Town of Walkerville
- City of Unley

Services provided:
- collection of waste from residential areas to waste transfer stations,
- management of depots & recycling centres
- hard rubbish,
- bin repair,
- missed bin reporting,
- education resourcing.
Business Continuity Communication Plan
An Incident Management Team would include a primary and alternate for the main positions to allow for resilience and ensure efficient and effective communications at all times.
Nominated contact details should also be obtained for all constituent councils and included in the Communication Plan in order to ensure councils can relay messages onto all relevant taxpayers, so that they can be updated for any given circumstance(s).</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R4.1 – Draft a Business Continuity Communications Plan
R4.2 – Draft pre-approved scripts for internal and external updates, for emails and websites and SMS updates to staff.
R4.3 – Include the use of these scripts in training/toolbox exercises to ensure they are embedded within internal practices</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Possible</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied.</td><td>Priority Rating</td><td>HIGH</td></tr>
<tr><td>Management Response</td><td colspan="6">Communication plan is included in the revised draft BCP. Further work will be conducted to create scripts and share with the teams.</td></tr>
<tr><td>Completion Date</td><td colspan="6">30 Sep 2026</td></tr>
</table>

<table>
<tr><th>5.0</th><th colspan="6">Review the level of Business Continuity communication with key third party contractors/suppliers</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
<u>Key Third Party Contractors/Suppliers</u>
There are a number of key contractors supporting daily operations at East Waste due to it being a small/medium sized operational team. These third party contractors/suppliers include IT providers/ telemetry system providers/ site security/waste vehicle recovery/ labour provision/training provision/diagnostic machine testing and calibration as well as others.

Root Cause: Key third party contractor and supplier dependencies have not been formally documented, prioritised or integrated into East Waste's Business Continuity arrangements.</td><td colspan="3">Detail
<u>Key Third Party Contractors/Suppliers</u>
Whilst a series of Service Level Agreements have recently been drafted for each of the constituent councils, Service Level Agreements should also be instigated between East Waste and identified key contractors/suppliers. This would ensure continuity of services and/or priorities for restoration of services, including identified data that needs to be maintained and/or critical services that need to be prioritised.
For IT services, these level of recovery data needs to be detailed in the relevant IT Disaster Recovery Plan.
When the Business Continuity Plan is reviewed/renewed, these contractors/suppliers should be listed, with contact details and summary information as to the agreed provisions. This will enable anyone managing a critical situation the level of detail and insight required.
For major contractors who may be needed by East Waste in an emergency, it would be advisable to ensure East Waste's requirements/contact details are also listed in their respective Business Continuity provisions.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R5.1 – When reviewing (& then periodically updating) the Business Continuity Plan, ensure the list of third party contractors/suppliers is current and includes key contact details and any other relevant information.
R5.2 – Consider drafting service level agreements or clarify via an 'updating statement' to each major contractor/supplier what might be needed should a business 'disruptive event' occur. (eg: IT DRP details/ telephony back up plans / provision of temporary vehicles / alternative site(s) to deliver waste loads).</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Possible</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied.</td><td>Priority Rating</td><td>MODERATE</td></tr>
<tr><td>Management Response</td><td colspan="6">Administration will action these recommendations and include key third party contractors including key roles and expectations.</td></tr>
<tr><td>Completion Date</td><td colspan="6">31 Oct 2026</td></tr>
</table>

<table>
<tr><td>6.0</td><td colspan="6">Assessment of Links to the IT Provision and Disaster Recovery Plan at East Waste</td></tr>
<tr><td>Findings</td><td colspan="3">Summary
<u>IT Disaster Recovery Plan</u>
When discussing IT disaster recovery, it was confirmed that at the moment there is no up-to-date IT Disaster Recovery Plan in place. Any IT related issues are reported to the external service provider and dealt with on an ad hoc basis, dictated by the urgency of the situation.
<u>Business Continuity vs Business Resilience</u>
In relation to the IT service provision and IT reinstatement following an outage, whilst onsite during March 2026 the offices were subject to an internet outage. This is recognised as not being an IT service outage, however, the situation was managed well by various staff members who continued by hot-spotting via the data provisions on their mobile phones. This manual workaround remained in place for the majority of the working day, a measure which was key as the payroll needed to be processed to the bank by close of business!
<u>Business Impact Assessment – links to IT Disaster Recovery Plan</u>
East Waste has not undertaken a Business Impact Assessment.

Note: A Business Impact Assessment template has been drafted for the management team at East Waste to work through when appropriate.

Root Cause: IT disaster recovery arrangements have not been formally identified and/or detailed via a completed Business Impact Assessment. As a result, critical IT systems, recovery priorities, outage tolerances, dependencies and escalation are undocumented.</td><td colspan="3">Detail
<u>Business Continuity vs Business Resilience</u>
It is acknowledged that the small team size and the 'can do' positivity witnessed across the organisation at East Waste will most likely resolve the majority of any 'business disruptions', however the intent of this audit is to review the provisions in place and to advise as to how the organisation can increase its resilience to such events. This resilience will remove the drama from certain business continuity events, allowing a smoother return to 'business as usual' and hopefully a continued, if not seamless (or as near as possible) service delivery experience for East Waste's customers.
<u>Business Impact Assessment – links to IT Disaster Recovery Plan</u>
This is not unusual as such assessments tend to be undertaken when an organisation has an established level of maturity in its business continuity management. For East Waste, this could be considered as a next phase, once the BC policy/plan/communications have been addressed.
A Business Impact Assessment works through all the IT needs of the business and addresses standard recovery information such as:
- Maximum Acceptable Outage (MAO),
- Recovery Time Objectives (RTO)/ Recovery Point Objectives (RPO)
- IT system recovery priorities and dependencies
- Communication and escalation requirements
This level of information will be necessary in due course when reviewing the IT Disaster Recovery Plan with the IT contract provider. This will then enable East Waste to ensure that the organisation;
(i) is aware of what it needs and
(ii) ensures that the details are accurately conveyed to the IT contract provider. It is important details are updated to revised IT DRP documentation/incorporated into future simulations.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R6.1 – Undertake a Business Impact Assessment to capture all the IT systems currently in use at East Waste and assign them a priority rating.
R6.2 – Liaise with the IT external provider to draft an accurate and updated IT Disaster Recovery Plan (IT DRP), addressing the priorities as ranked in the Business Impact Assessment. (see R6.1)
R6.3 – Manager Business Services to schedule a desktop exercise to include IT failures and telephony system outages to raise Business Continuity awareness amongst admin based staff, with outcome of the desktop exercise to be used as a training resource.</td></tr>
<tr><td>Current Risk Rating</td><td>LOW</td><td>LIKELIHOOD</td><td>Unlikely</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied.</td><td>Priority Rating</td><td>LOW</td></tr>
<tr><td>Management Response</td><td colspan="6">Administration conducted a cyber desktop scenario led by Marsh, via LGRS. Administration will utilise the feedback of this activity in conjunction with these recommendations to add to the BCP draft.</td></tr>
<tr><td>Completion Date</td><td colspan="6">31 Oct 2026</td></tr>
</table>

<table>
<tr><td>7.0</td><td colspan="6">Business Continuity detailed in Organisational Risk Registers.</td></tr>
<tr><td>Findings</td><td colspan="3">Summary
East Waste Strategic Risk Register
The Strategic Risk Register at East Waste was provided as an initial source document when undertaking the Assurance Mapping during 2025. This mapping then informed the Internal Audit workplan 2025 – 2027.
There are currently 10 strategic risks listed, including one relating to Business Continuity:
SR7: A significant, unplanned/emergency/adverse event may prevent East Waste from delivering key services/functions (eg: fire, natural disaster, pandemic)
This risk was updated to the register in July 2023 and has a full list of causes including pandemic, fire onsite, lack of BCP and/or BCP training, drivers' strike, no emergency management in place, bushfire in commuter zones, lack of staff who have BCP experience/training, non-defined staff responsibilities.
Several of the above causes relate to the provision of plans and training which are addressed on Worksheet 9.0
The current risk rating for SR7 remains assessed as High, which reflects the reliance on informal processes, limited documentation and the lapsed training and exercises.
<table><tr><td>Inherent</td><td>Extreme</td></tr><tr><td>Current</td><td>High</td></tr><tr><td>Forecast</td><td>High</td></tr></table>
Root Cause: The Business Continuity risk is recognised in East Waste's Strategic Risk Register, however the related controls have not been reviewed, tested or updated.</td><td colspan="3">Detail
East Waste Strategic Risk Register
The controls listed as in place are:
1. Current BCP in place and tested annually / 2. Current workplace EM plan in place tested 3. Current WEEPs in place / 4. EBA with medication framework contained within (untested at this stage) 5. Battery isolators in trucks, trucks emptied each night / 6. Security patrols in place (for early pick up of issues) 7. Staff training requirement captured in TNA and training delivered in line with training plan 8. Staff PDs include responsibilities appropriate to role – reviewed and kept current 9. Arrangements in place in EW and with member councils for changes in activity due to natural disasters
Whilst undertaking this audit, the listed controls have been reviewed;
1.BCP has been tested in essence via a catalogue of business events rather than formally tested to the BCP documentation via a training provision. / 2. Workplan emergency management details have not been reviewed due to the Risk & WHS Coordinator resigning whilst the audit was being undertaken. Due to workload pressures, the relevant workplace EM plan and/or testing program have not been cited and are therefore omitted from our testing and findings. / 3. Same as above/ 4. Same as above / 5. Same as above – although it was noted that several truck fires have been reported over recent months. These have been dealt with in liaison with the respective local council areas, the causative factors have not been clarified, however it is assumed that issues have been addressed and educational update sent to residents. / 6. Security patrols have not been evidenced; however they have been part of the Business Continuity discussions and are a key detective control during the evening/night hours. / 7. Same as above – staff BC and/or EM training was not cited on the TNA and training has not been evidenced in the 12-18 month period of this audit scope. / 8. Same as above - staff PDs have not been cited or reviewed./ 9.. No formal evidence of arrangements with member councils, however it is accepted that this would be facilitated on an ad hoc basis.
- Discussion with management noted that Service Level Agreements (SLAs) have been drafted and issued to the 8 constituent councils. Final approvals are awaited.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R7.1 – Review the controls listed against SR7 on the Strategic Risk Register to ensure all are current, addressing any that have lapsed as a priority.
R7.2 – Review the Additional Controls cited to ensure all related actions have been completed or are completed as a priority.
R7.3 - Ensure Business Continuity exercises and related documentation are updated to the controls listed once undertaken.</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Possible</td><td>CONSEQUENCE</td><td>Minor</td><td></td></tr>
</table>

Control Effectiveness	**PARTIALLY EFFECTIVE**	**Improvements have been identified but not yet applied.**	**Priority Rating**	**HIGH**
Management Response	Administration will undertake this activity and update the BCP accordingly.			
Completion Date	**31 Oct 2026**			

<table>
<tr><th>8.0</th><th colspan="6">Assessment of recent Business Continuity Response/Recovery Exercises and Lessons Learnt in the Debrief</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
Recent Business Continuity Response/Recovery Exercises
During the period of this audit scope, the last 12–18 months, there have been no structured Business Continuity Response or Recovery exercises.
The current Business Continuity Framework and Plan outlines an organisational commitment to annually test the plan and maintain updates to staff contact lists; however, this has lapsed.
Framework and Plan Review
East Waste has a Business Continuity Framework and Plan dated 2015, which pre-dates COVID-19 and is now over ten years old.
This framework and plan have been referenced during this audit and much of the text remains relevant, so the format is accepted as a good basis for review and update.
Lessons Learnt and Debrief Process
There have been learnings from recent business disruptions, however the Business Continuity Framework and Plan were not referenced, preferring to deal with each incident in real time with managerial resources and experience already in place.
There was no evidence of a defined ‘Business Continuity’ process or structured response, no specific tools or templates have been created and no business impact assessment undertaken.
Business Continuity responses have been managed by the management team and workers with extensive knowledge of the business.

Root Cause: Business Continuity testing, exercising and debrief processes have not been maintained as part of East Waste’s regular governance, business continuity and training cycle.</td><td colspan="3">Detail
Recent Business Continuity Response/Recovery Exercises
However, over recent months, there has been a turnover of key management and specialist staff which would have contributed to these training exercises being deferred.
It was confirmed, via discussion with the General Manager and Manager Business Services (March 2026), that Business Continuity has been managed in a more reactive manner, with a focus of returning to operational status as soon as possible.
Recent Business Continuity Response/Recovery Exercises
While formal exercises have not been undertaken, East Waste has experienced several real-life business continuity events over recent months (already documented in this report). Each has been managed in a reactive and positive manner, although without testing Business Continuity reference documentation or related tools.
Lessons Learnt in the Debrief
Going forward, provision needs to be put in place for responses to be supported by knowledge, awareness, trained individuals in recognised Business Continuity roles, bespoke documentation, pre-approved scripts and regular exercises.
It was agreed that the Business Continuity Framework and Plan become two separate documents to enable the Framework to support the policy position and the Plan to become a ‘living document’, with additional templates to guide and support actions required during and following a business continuity event.
Each exercise or real-life event should be followed up with a debrief in order to capture all relevant information and share that knowledge to ensure a maturing of response processes and so make for smoother recoveries back to ‘business as usual’.
East Waste also needs to recognise the need to have formal communication channels and protocols as many disruptive events require wider communications and regular media and website updates.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R8.1 - Raise awareness across the organisation for Business Continuity, the documentation, the key staff and the aim of returning to ‘business as usual’ as promptly as possible.
R8.2 - Ensure debriefs are held to consolidate learnings, check on staff well-being, record outcomes and ensure a maturing of Business Continuity knowledge across the organisation.
R8.3 - Create a series of one-page A3 poster displays to raise awareness and clearly present Business Continuity information, including the responses requiring activation of the Business Continuity Plan, when and how these responses should be activated, and what key actions should be undertaken, including post-event debriefs.</td></tr>
<tr><td>Current Risk Rating</td><td>HIGH</td><td>LIKELIHOOD</td><td>Possible</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>INEFFECTIVE</td><td colspan="3">Control is rarely applied or has not been tested</td><td>Priority Rating</td><td>HIGH</td></tr>
</table>

Management Response	Administration has commenced broader team engagement through Toolbox with all staff and through the WHS Committee. Generation of one page posters will be generated and placed in relevant work areas.
Completion Date	**31 Oct 2026**

<table>
<tr><th>9.0</th><th colspan="6">Corporate Business Continuity Training and Resources in Place</th></tr>
<tr><td>Findings</td><td colspan="3">Summary
Business Continuity Training
Through discussion with the General Manager, it was noted that there had been no recent Business Continuity training, no formal exercising and no review, although there was acknowledgment of the Business Continuity Framework and Plan 2015.
Recent risk related work undertaken with the LGRS has resulted in an updated Training Needs Analysis (TNA) which outlines roles requiring Business Continuity and related emergency management raining, as well as Emergency Planning Committee training. Once this is executed, the level of awareness will improve across the organisation
Business Continuity Resources in Place
Business Continuity resources are minimal at present, and in need of review as they date back to 2015.
It has been noted previously in this report that the Framework and the Plan should be split in order to maximise the usefulness of both and to ensure that the Plan section is kept updated in real time, with regular reviews of contact names and numbers and protocols as data can quickly become obsolete.
Root Cause: Business Continuity training and supporting resources have not been maintained, refreshed or embedded as part of East Waste’s regular staff capability program.</td><td colspan="3">Detail
Business Continuity Training
Business Continuity often requires the implementation of regular skills within an exaggerated context. This response and recovery information needs to become second nature in order to demystify the actions required and resume normal operations as smoothly as possible.
Training will ensure that staff are aware of this and for key staff in identified positions, they can then use the available resources and recognised networks to response appropriately.
Business Continuity is a recognised area for review and will be addressed as a priority, and was already earmarked for attention, hence it’s inclusion in the current Internal Audit program.
Business Continuity Resources in Place
Through discussion it was noted that a series of templates would be useful to guide staff through the key areas that will need addressing during a business continuity event, either at the local level or the wider location level. It is recognised that when an emergency response or business continuity event is occurring, an action checklist provides structure and ensures all points are considered and/or covered, often de-escalating the situation.
A series of templates and pre-approved scripts will be drafted for East Waste to work through and modify as needed for their organisation and operations.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R9.1 – Develop a series of templates and pre-approved scripts for internal and external updates, via email, websites and social media updates in order for East Waste to review and modify as needed for their organisation and operations.
R9.2 – Scheduled regular Business Continuity training as per the renewed TNA and consider inviting members from the constituent member councils when/where appropriate as a networking opportunity.</td></tr>
<tr><td>Current Risk Rating</td><td>HIGH</td><td>LIKELIHOOD</td><td>Possible</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>INEFFECTIVE</td><td colspan="3">Control is rarely applied or has not been tested.</td><td>Priority Rating</td><td>HIGH</td></tr>
<tr><td>Management Response</td><td colspan="6">Scripts will be created to support likely BCP scenarios and Administration will schedule training and refresher activities through Skytrust, our safety management program.</td></tr>
<tr><td>Completion Date</td><td colspan="6">31 Oct 2026</td></tr>
</table>

Diagram 5 – Extract from new East Waste TNA 2025/26 – focus on Business Continuity/Emergency Mgt & Emergency Planning Committee

EAST WASTE 2025/2026 TNA Extract		Bus.Cont. Training (Overview)	Bus.Cont. Training (Role Specific)	Bus.Cont. Training (Induction)	WHS Em.Mgt Procedure (Induction)	WHS Em.Mgt Procedure	ECO training	EPC training	Emergency Eqt (inc.Comms.)	Emergency Drills
Emergency Control Organisation	Chief / Dep.Chief Warden					x	x			
	Communications Officer					x	x			
	First Aid Officer					x	x			
	Warden					x	x			
EPC	Nominated officer					x	x	x	x	
Senior Management Team	General Manager	x		x	x					x
	Mgr Business Svs	x		x	x					x
	Mgr HR & Fin Svs	x		x	x					x
	Mgr Operational Svs	x		x	x					x
Business Continuity	Emergency Response Mgr		x							
	Incident Manager		x							
	Recovery Coordinator/ Bus.Cont.Custodian		x							

Need to identify who's undertaking the following roles - and who's going to be the secondary in the event of the primary being off sick/on leave/unavailable etc:

- Emergency Response Mgr

- Incident Manager

- Recovery Coordinator/ Bus.Cont.Custodian

<table>
<tr><th>10.0</th><th colspan="6">Review that Business Continuity and Workplace Emergency Management Plans Are In Place and Reviewed</th></tr>
<tr><td>Findings</td><td colspan="3">Summary

Emergency Management reports through to the Health and Safety Committee via the Emergency Planning Committee where relevant.

The establishment of an Emergency Planning Committee is referenced in the Business Continuity framework & Plan 2015, however there are currently no available minutes from the Emergency Management Planning Committee (for the last 12- 18 month period).

There is a standing EPC update on the Health & Safety (H&S) Committee agenda.

This Committee should sit at least once annually, more practicably meetings are every six months.

Note: A draft Terms of Reference has been provided to ensure that when this Committee is re-invigorated, all key elements are covered.

Root Cause: Emergency Planning Committee governance arrangements have not been maintained and updates have not been made to the H&S Committee.</td><td colspan="3">Detail

Minutes from the H&S Committee were reviewed for the current period back to January 2025, six meetings:
- 10 Feb 2026 - 24 Jun 2025
- 18 Nov 2025 - 13 Mar 2025
- 24 Jul 2025 - 16 Jan 2025
EPC updates were only noted against the January 2025 minutes and in relation to a truck fire and the need for fire suppressant equipment and communication processes with CFS/MFS.

There is no further information available regarding the EPC, its membership and/or its annual workplan. This is understood to be a consequence of the key staff member with oversight of this committee, the Risk & WHS Coordinator, having recently resigned.

Under Australian Standard 3745 – Planning for Emergencies in Facilities, there is a code of practice which is widely recognised as ‘best practice’, requiring the establishment of an Emergency Planning Committee (EPC), for the purpose of regular reviews, testing exercising and reporting.</td></tr>
<tr><td>Recommendation(s)</td><td colspan="6">R10.1 – Formally review the Emergency Planning Committee (EPC) and ensure membership includes representation from each constituent council, as well as key specialists from within East Waste itself.
R10.2 – Set two meeting dates per year (six monthly and 2 weeks prior to a H&S Committee date) to ensure issues can be presented and reported immediately through to the H&S Committee for discussion and/or actioning.
R10.3 – Review the Terms of Reference for the EPC to clarify the remit of the EPC, it’s scope, and the need to present EPC Minutes to the following H&S Committee.
R10.4 – Draft and approve an annual workplan to enable the required emergency management related actions to be undertaken in the time between meetings</td></tr>
<tr><td>Current Risk Rating</td><td>MEDIUM</td><td>LIKELIHOOD</td><td>Unlikely</td><td>CONSEQUENCE</td><td>Moderate</td><td></td></tr>
<tr><td>Control Effectiveness</td><td>PARTIALLY EFFECTIVE</td><td colspan="3">Improvements have been identified but not yet applied</td><td>Priority Rating</td><td>HIGH</td></tr>
<tr><td>Management Response</td><td colspan="6">Administration will undertake a review of the EPC and action the recommendations.</td></tr>
<tr><td>Completion Date</td><td colspan="6">31 Dec 2026</td></tr>
</table>

Appendix A – Audit Scope

INTERNAL AUDIT PLAN 2025 - 2027

With assurance, comes agility, flexibility, shape shifting, an ability to seize opportunities and add strategic value.

2025/26	Schedule	Reference	Risk	Report to ARC	Rating/ Source	Detail Approved - A&RC 18/06/25
Yr 1/Q2	Jan/Feb	**Business Continuity**	SR7	Apr-26	55%	Pandemic + 5 years - level of readiness, lessons learnt & implemented

Type

Assurance/Resources

Strategic Risk

SR7 - A significant unplanned/emergency/adverse event may prevent East Waste from delivering key services/functions (e.g. fire, natural disaster, pandemic)

Objective

To assess the ability of the organisation to detect, assess, activate and stand down from a business continuity event

Background

- Identified via the Assurance Mapping process and in reference to the strategic/high operational risk registers of the organisation.
- Further discussion at the A&RC meeting in June 2025 resulted in approval for inclusion in the 2025/26 - Year 1 Work Plan.
- Internal Audit scope presented to the East Waste Audit & Risk Committee in September 2025 in order to finalise prior to commencement on site in January 2026.

Scope

- To undertake a review of the:
    - Business continuity policy/procedure/plan and business impact assessment are in place and consistent across the organisation
    - response to a local incident, that the Incident Management Team roles are identified and that staff have undertaken the appropriate training,
    - response to a more widespread incident, that the Crisis Management Team roles are identified and that staff have undertaken the appropriate training
    - level of current business continuity communication with constituent Councils
    - level of current business continuity communication with key third party contractors/suppliers
- To assess the adequacy and appropriateness of:
    - links to ICT and Disaster Recovery planning
    - business continuity detail in the organisational risk registers to ensure it's up-to-date and correlates to business impact assessment
    - any recent business continuity response/recovery exercise and any 'lessons learnt' in the debrief
    - the corporate business continuity training and level of resources in place
    - workplace emergency management plans and check that they are practised
    - any business impact assessment undertaken, including any previous and relevant BCP related action points
- Additional items as may become apparent during testing

Appendix B – Risk Management

Strategic Risk, Matrix and Risk Tables

	CONSEQUENCE				
LIKELIHOOD	Insignificant	Minor	Moderate	Major	Significant
Certain to occur	High	High	Extreme	Extreme	Extreme
Very likely	Medium	High	High	Extreme	Extreme
Possible	Low	Medium	High	Extreme	Extreme
Unlikely	Low	Low	Medium	High	Extreme
Rare	Low	Low	Medium	High	High

Risk Acceptance Table

RISK RATING	Acceptance Level	Control Level	Monitoring	Reporting
Low	Acceptable	Adequate	Active	Quarterly/Yearly
Moderate	Acceptable	Adequate	Active	Monthly/Quarterly
High	Acceptable is some circumstances	Excellent	Pro-Active	Weekly/Monthly
Extreme	Unacceptable in most circumstances	Excellent	Pro-Active	Daily/Weekly

Consequence Table

	Reputation	Commercial	Business Impact	WHS/ Public Safety	Environment
Insignificant	Public Image: *No adverse effect* Community Concern: *Insignificant* Social Health & Community Wellbeing: *Negligible adverse impact* Impact on established community relationships *Little or no impact*	Effect on Constituent Council Membership: *No change in membership* Effect on East Wast viability as entity: *No effect*	Delay in Undertaking Routine Needs or Tasks *Delay of up to ½ day* Legal Issues *nil*	Injuries *No injuries or no significant injuries* Effect on Property *Negligible loss or damage to property/ infrastructure*	SA EPA Act *'Nuisance' category under Act* Contamination *On-site release immediately remedied* Effect on species/ ecosystems *Slight, quick reversible damage to a few species*
Minor	Public Image: *Kept onsite, no media interest, minor adverse effect* Community Concern: *No community interest* Social Health & Community Wellbeing: *Minor adverse impact* Impact on established community relationships *Minor impact*	Effect on Constituent Council Membership: *Possibility of change in Membership raised* Effect on East Wast viability as entity: *Minor impact able to be addressed by management*	Delay in Undertaking Routine Needs or Tasks *Delay of up to 1 day* Legal Issues *nil*	Injuries *First Aid treatment* Effect on Property *Minor loss or infrastructure damage*	SA EPA Act *'Nuisance' category under Act* Contamination *On-site release remedied without impact on business* Effect on species/ ecosystems *Some minor adverse effects to a few species/ ecosystem parts that are short term and immediately reversible*
Moderate	Public Image: *Local media coverage, moderate adverse effect* Community Concern: *One or two community complaints* Social Health & Community Wellbeing: *Moderately reduced opportunities for participation in community life and/or decision making* Impact on established community relationships *Moderate incidences of increased isolation*	Effect on Constituent Council Membership: *Change of membership by 1 (either gain or loss)* Effect on East Wast viability as entity: *Effect that requires Board attention*	Delay in Undertaking Routine Needs or Tasks *Capability/ service impaired, moderate impact on stakeholders, delay of 1-3 days.* Legal Issues *Minor legal issues, non-compliances and breaches of regulation*	Injuries *Medical treatment required* Effect on Property *Moderate loss/ or infrastructure damage*	SA EPA Act *'Material' category under Act* Contamination *On-site release contained without outside assistance* Effect on species/ ecosystems *Temporary reversible damage, loss of habitat and migration of animal population, plants unable to survive, pollution requires physical removal, land contamination localised and can be quickly remedied.*
Major	Public Image: *State media coverage, interest by Member Councils, interest by regulators, major adverse effect* Community Concern: *Seriously affected by major community unrest* Social Health & Community Wellbeing: *Seriously affected by major community interest* Impact on established community relationships *Significant breakdown*	Effect on Constituent Council Membership: *Change of membership by 2 or more (either gain or loss)* Effect on East Wast viability as entity: *Effect that requires Member Council attention*	Delay in Undertaking Routine Needs or Tasks *Loss of capability, disruption to services, major impact on stakeholders and delay of 3-5 days* Legal Issues *Serious breach of regulation with investigation or report to authority with prosecution and/or moderate fine possible*	Injuries *Serious or extensive injuries* Effect on Property *Serious structural damage to infrastructure or serious loss of assets*	SA EPA Act *'Serious' category under Act* Contamination *Off-site release or spillage With no detrimental outcome* Effect on species/ ecosystems *Death of individual animals, large scale injury, loss of keystone species and widespread habitat destruction.*
Catastrophic	Public Image: *National media coverage, leads to changes at Executive or Board level, loss of key contracts* Community Concern: *Hugely affected by major community unrest* Social Health & Community Wellbeing: *Hugely affected by major community unrest* Impact on established community relationships *Significant breakdown*	Effect on Constituent Council Membership: *Termination of East Waste* Effect on East Wast viability as entity: *Termination of East Waste*	Delay in Undertaking Routine Needs or Tasks *Loss of services and capability, failure to meet stakeholders' needs for more than 5 days. Project & program failure, inability to meet minimum standards, most objectives not met.* Legal Issues *Major breaches of regulation, major litigation*	Injuries *Fatalities* Effect on Property *Critical loss, irreversible damage to property/ infrastructure*	SA EPA Act *'Serious' category under Act* Contamination *Toxic release or major spillage off-site with detrimental effect.* *Permanent and widespread land contamination.* Effect on species/ ecosystems *Death of animals in large numbers, destruction of flora species and irreversible soil erosion or severe compaction, widespread introduction of weeds*

Appendix C – East Waste Strategic Risk Register – Extract SR7

EAST WASTE
Strategic Risk Register

							Inherent Risk			Controls	Current/ Residual Risk			Forecast Risk			Additional controls
Date of Risk ID	Risk ID	Strategic Plan Reference	Risk Category	Risk Description	Consequence Type(s)	Causes	C	L	Inherent Risk Rating	Description	C	L	Current Risk Rating	C	L	Forecast Risk Rating	Further treatment required (if current/ residual risk rating is not acceptable)
13-Jul-23	SR7	All Objectives (specifically objective 5)	Service Delivery	**A significant unplanned/emergency/adverse event may prevent East Waste from delivering key services/functions (e.g. fire, natural disaster, pandemic)**	Financial/ Infrastructure Service Delivery Environmental/ Cultural/ Site Disturbance Reputation Legal/ Regulatory/ Policy	1. Pandemic; 2. Fire - losing assets (trucks/ building etc); 3. No BCP in place; 4. Lack of BCP testing and training; 5. Driver strike; 6. No workplace emergency management plan in place; 7. Bushfire (which affects people's ability to come to work); 8. Lack of staff who have experienced significant BCP/ emergency events; 9. Staff responsibilities in the case of an incident are not defined; 10. Staff are not trained appropriately in the case of an incident;	Major	Very likely	Extreme	1. Current BCP in place, tested annually 2. Current workplace EM Plan tested 3. Current WEEPs in place 4. EBA with mediation framework contained within (untested at this stage) 5. Battery isolators on the trucks, trucks are empty each night 6. Security patrols in place on a daily basis (for early pick up of issues) 7. Staff training requirement captured in TNA and training delivered in line with the training plan 8. Staff PD's include responsibilities appropriate to their role - reviewed and kep current 9. Arrangements in place in EW and with member councils for changes in activity due to natural disasters.	Moderate	Possible	High	Moderate	Possible	High	1. Investigating opportunities for the minimising the risk of fire spreading between truck and other assets 2. Development of SLA's with member Councils to incorporate Natural Disasters

Connect to possibility

Let us help you achieve further business success

UHY Haines Norton
Chartered Accountants

25 Peel Street
Adelaide SA 5000
Phone 8110 0999 (office)
Email adelaide@uhyhnadl.com.au

5.3 Review of the Complaint Handling Policy (Adjourned Item)

Report Author:	Principal Consultant – Clearly Strategic
Responsible Officer:	Acting Manager Business Services
Attachments	A: Revised Complaint Handling Policy B: Existing Complaint Handling Policy

Purpose and Context

The East Waste Complaint Handling Policy has undergone a scheduled review and is presented to the Audit & Risk Management Committee for consideration and feedback before being presented to the East Waste Board for adoption.

Recommendation

That the Audit & Risk Management Committee having considered the revised Complaint Handling Policy, Item 5.3, Attachment A, Audit & Risk Management Committee Meeting 13 August 2026:

1. ***Provides feedback on the revised Complaint Handling Policy for consideration prior to presentation to the East Waste Board.***
2. ***Recommends that the East Waste Board adopt the revised Complaint Handling Policy.***

Strategic Link

Objective 5. Provide Leadership

Strategy 5.4 Quality and transparent Corporate (Governance and Financial) activities.

Background

In November 2019, the Local Government Association Worker's Compensation Scheme (LGAWCS) completed an audit of East Waste's Risk Management systems and processes. The Audit resulted in a Risk Action Plan being adopted which included an action item to develop and implement a Complaint Handling Policy (Policy). As such, a Complaint Handling Policy was developed and subsequently adopted by the East Waste Board.

The Policy was most recently reviewed by the East Waste Board in June 2023 as presented in Attachment B (***refer Attachment B***).

Discussion

Policy Research

Neither the *Local Government Act 1999* (Act) nor the East Waste Charter (endorsed in June 2022) stipulates how East Waste is required to manage complaints, feedback or requests for service.

Section 270 of the Act provides that councils must develop and maintain policies, practices and procedures for dealing with any reasonable request for the provision of a service by the council or the improvement of a service by the council.

- any reasonable provision of a service by the council or the improvement of a service by the council; and
- complaints about the actions of the council, employees of the council, or other persons acting on behalf of the council.

Ombudsman SA independently investigates complaints about South Australian government departments, local councils, and statutory authorities. They assess whether agencies acted lawfully, reasonably, and fairly; can make recommendations to fix issues, improve processes, and remedy individual injustices. In 2016 Ombudsman SA published a Complaint Management Framework to assist agencies to fairly and effectively manage and distinguish between complaints, requests for service and the provision of feedback.

The Australian Standard AS/NZS 10002:2014 (R2022), *Guidelines for complaint management in organisations* sets out a flexible, principles-based framework to design, implement, and continually improve a fair, accessible, and timely complaints process. Its intent is to help organisations resolve individual grievances effectively, capture insights from complaints, and use them to improve services and prevent problems recurring.

In reviewing the Complaints Handling Policy the frameworks contained within all three of the above documents were considered.

Relevant East Waste staff were also consulted to ensure the revised Policy aligns with existing processes, remains operationally practicable, and supports effective complaint management. This consultation identified the need for clearer roles and responsibilities, together with defined escalation pathways based on the seriousness of the complaint. The Policy has been updated accordingly.

The revised Policy therefore seeks to align East Waste's complaint handling approach with contemporary good-practice guidance while remaining practical for East Waste's operating environment.

Proposed Policy Revisions

In reviewing the current Policy, care was taken to ensure the revised Policy focuses on the customer's experience with East Waste, whether they are providing feedback, requesting a service or seeking resolution to a concern.

The Policy is an external document and therefore it is important that the Policy clearly sets out the information East Waste's customers require in order to be able to express their opinions.

The revised version of the Policy is presented at Attachment A (***refer Attachment A***).

An overview of the proposed changes includes:

- A simplified Introduction (Section 1).
- The inclusion of a scope to which the Policy relates (Section 2).
- Inclusion of new defined terms (Section 3). Including an updated definition of a Complaint, and the inclusion of the definition of a Significant Complaint, Major Complaint, and a Senior Officer.
- Amendment to Section 4.3 to clarify the process for formal lodgment of complaints, should they not be able to be resolved at the first point of contact.
- The introduction of Section 5 which sets out roles and responsibilities.

- The process for making and submitting a complaint has been updated (Section 6).
- The complaint handling process (Section 7) has undergone significant review to improve East Waste's handling of complaints, with clearer defined roles and responsibilities and escalation channels, including an approach for Significant and Major Complaints.
- Section 8 has been updated to reflect the process for escalation in line with responsibilities of staff.
- Section 9 has been amended to reflect advice from Ombudsman SA regarding clear guidelines for how unreasonable conduct by complainants will be addressed by agencies.
- Other minor grammatical and wording changes have been made to improve the accuracy of the document, including updating position titles and working groups in line with East Waste's organisation chart.

The Policy includes procedural information to inform customers how complaints will be managed without requiring them to access a separate procedural document.

As a service-based organisation, East Waste has received, and will continue to receive, complaints about issues of concern. The Policy is designed to support Administration in handling complaints while improving the customer experience, ensuring good governance and recognising that complaints and feedback provide opportunities for continuous improvement.

Version No: 2
Issued: August 2026
Next Review: August 2030

Complaint Handling Policy

1. Introduction

1.1. The Eastern Waste Management Authority herein referred to as East Waste, is committed to achieving customer service excellence by striving to deliver services in a professional, coordinated and timely manner.

1.2. East Waste recognises that feedback and complaints provide the organisation with an opportunity to improve services and resolve matters of concern.

1.3. East Waste is committed to making its feedback and complaints process transparent, accessible, inclusive and responsive.

1.4. This Policy sets out our approach to handling feedback and complaints from customers of East Waste (including Constituent Councils, their staff, residents, businesses, and members of the public). It provides a fair, consistent, and structured process for receiving, investigating, and resolving concerns.

2. Scope

2.1 This Policy applies to all:

- all complaints about East Waste's services, decisions, or actions taken by East Waste (including by the East Waste Board, Board Committees, employees, contractors, or agents of East Waste). Feedback that is not a formal complaint (for example, general comments or suggestions) is also welcomed, as it helps continually improve our services.
- forms of service feedback and complaints about East Waste operations, except where another legal or policy process applies.

3. Definitions

3.1. **Business Day** means a day when East Waste is normally open for business, i.e. Monday to Friday, excluding public holidays.

3.2. **Complaint** means an expression of dissatisfaction by a customer with a product, service or behaviour delivered by East Waste or its representatives where the customer requests for a formal complaint to be recorded and expects a response or remedy.

3.3. **Complainant** means the person or organisation making the complaint.

3.4. **Customer** means a person who is utilising services or programmes provided by East Waste and includes external customers being any Constituent Council, their staff and/or residents, members of the public or organisations that interact with East Waste.

3.5. **Employee** means any person acting on behalf of East Waste (this includes employees, Board Directors and committee members, contractors, and consultants).

3.6. **Feedback** means any opinion, comment / suggestion, compliment or expression of interest/ concern made directly or indirectly by a customer where a response or resolution is not explicitly or implicitly expected or legally required.

3.7 **Major Complaint** means a complaint about a serious matter that, due to its nature, severity, or potential impact, raises issues that are complex, high-risk, systemic, or likely to attract significant public or regulatory attention that may adversely affect the organisation or its Constituent Councils, and requires notification to the East Waste Board.

3.8 **Request for Service** is an application to have Easte Waste take some form of action to provide a service or improve a service. East Waste receives complaints and feedback across all areas of its operations and makes the distinction between a request for service, feedback and a complaint for the purpose of this policy.

3.9 **Senior Officer** is an employee of East Waste within the Executive Leadership Team, being a Manager or the General Manager.

3.10 **Significant Complaint** means a complaint that cannot be resolved at the initial or lower level of staff responsibility and requires escalation to a Senior Officer. A complaint will also be considered significant where one or more of the following apply:

- It involves actual or potential serious harm (e.g. safety, financial, legal, or reputational risk).
- It affects, or has the potential to affect, multiple people or a broader group of stakeholders.
- It involves, or has the potential to involve, a breach of legislation, regulatory requirements, or organisational policy.

4. Guiding Principles

East Waste will manage feedback and complaints in line with the following principles:

4.1. **People Focus**: East Waste is open to feedback and/or complaints from all customers. Complainants will be treated with respect and understanding, and East Waste welcomes input as an opportunity to improve our services.

4.2. **Transparency:** East Waste will make it clear how and where complaints can be made (via email, phone or web form) and explain the process of complaint management in plain language. All methods of complaint lodging will be acknowledged equally. Information about timelines and possible outcomes will be provided to complainants, subject to legislative requirements.

4.3. **Responsiveness**: Complaints will be acknowledged promptly and addressed in a timely manner. The Complainant will be kept informed of progress and expected timeframes. East Waste is genuine in its communication and follows through on its promises. East Waste aims to resolve complaints at the first point of contact if possible; otherwise, complaints will be formally lodged and will be escalated appropriately (see Section 6).

4.4. **Fairness**: To ensure the complaint handling process is fair and reasonable, complaints are dealt with in an impartial, objective and unbiased manner. East Waste will consider all relevant information before making decisions. Complainants will have the opportunity to present their case and respond to findings. East Waste will ensure that making a complaint will not unfairly disadvantage the Complainant i.e. no “victimisation”.

4.5. **Support**: East Waste supports and assists customers who want help to provide feedback and/or make a complaint. There are opportunities for internal and external review and/or appeal about the organisation’s response to the complaint, and complainants are informed about these avenues when applicable.

4.6. **Confidentiality**: The Complainant’s personal information and details of the complaints will be kept confidential and only disclosed on a need-to-know basis. East Waste will seek permission from the Complainant should their details need to be disclosed. Complaints about employee conduct will be handled discreetly to protect the privacy of all involved.

4.7. **Accountability:** Clear roles and responsibilities for complaint handling are established. Staff who handle complaints are trained and have authority to investigate and respond. All complaints and outcomes will be recorded, monitored, and reported to management to ensure accountability. Performance against complaint-handling standards will be periodically reviewed by senior management.

4.8. **Continuous Improvement**: East Waste views complaints as valuable feedback. Complaint trends and outcomes will be analysed to identify underlying issues and to improve systems, procedures, and service delivery. Lessons learned from complaints will be communicated to relevant staff, and changes will be made where necessary to prevent recurrence.

5. Roles and Responsibilities

5.1 **Complainants** are responsible for providing accurate and complete information when submitting a complaint. They should include relevant details (who, what, where, when, why) and any supporting evidence. Complainants should cooperate with requests for further information.

5.2 **Frontline Staff** (Customer Service Officers, drivers, etc.) should attempt to resolve issues immediately at first contact. If the issue cannot be resolved at the first point of contact, it will be recorded as a complaint and escalated to the appropriate staff.

5.3 **Managers, Business Partners, Coordinators, Team Leaders and Leads** are responsible for handling complaints escalated to them. If a complaint cannot be resolved within two (2) business days and the customer requests to escalate the complaint, they should inform customers about this Policy and direct them to the correct contact points. They should ensure investigations are thorough and fair. Managers must keep Complainants informed, seek resolution when possible, or escalate further if needed (for example to the General Manager). Managers will ensure all staff follow complaint procedures and that outcomes are implemented

5.4 **General Manager** is responsible for investigating Major Complaints and overseeing complaint management and ensuring compliance with this policy. The General Manager will receive written complaints that request escalation (Internal Review) and coordinate the review process. The General Manager will report complaint data and trends to the East Waste Board annually.

5.5 **East Waste Board** receives periodic reports on complaints and compliment data as part of governance oversight. The Board will be notified of any major complaints and any requests for Internal Review of an East Waste Decision (Section 7).

6. Making and Submitting a Complaint

6.1. How to Lodge a Complaint

To submit a complaint please contact East Waste via any of the below options:

- Email: east@eastwaste.com
- Phone: (08) 8347 5111
- Online form: www.eastwaste.com.au.
- In person: 1 Temple Court Ottoway.

6.2 No Discrimination of Method

The method of lodging a complaint does not affect our response. All complaints will be treated equally, whether received in writing, by phone, on our website, or in person. If a complaint is made anonymously or through social media, it will be treated as a request for information or service.

6.3 Information Required

To assist East Waste in effectively managing a complaint the Complainant should provide sufficient information to assist East Waste in investigating the concerns including a summary of what the complaint is about and any relevant key information such as, but not limited to:

- The Complainant's name, contact details and preferred method of communication.
- A clear statement of the concern (what happened, where, and when).
- Any relevant details or documents (e.g. photographs, notes, invoices).
- Any identifying details of the East Waste staff involved, if known (e.g. name, description, or truck number)
- The outcome or remedy sought by the Complainant.
- When a complaint is raised verbally, East Waste staff will record the details or ask the Complainant to submit a written statement if needed (taking into account the Complainant's circumstances). Reasonable assistance will be offered to help Complainants articulate their concerns.

7. Complaint Handling Process

7.1 Acknowledgement

7.1.1 Upon receiving a complaint and where a response to the customer is requested, East Waste will contact the Complainant as soon as possible and within two (2) business days, either via phone or email. The acknowledgment will include:

- the name and contact details of the person handling the complaint.
- The outcome or proposed resolution for the complaint.

- if the complaint cannot be resolved within two (2) business days, an expected timeframe for a response.
- For significant complaints, an outline of the process including a link to, or copy of, this policy.

7.1.2 If the complaint was made by phone or in person, the Complainant will be advised that their concerns have been recorded and will be actioned.

7.2 Initial Assessment

7.2.1 Employees will be trained to manage complaints efficiently and effectively and provided with a level of delegated authority appropriate for the nature of complaints they are expected to resolve.

7.2.2 The employee will attempt to resolve or de-escalate the matter at first contact where appropriate (for example, by providing a simple explanation or making a minor correction). If the matter is resolved, the employee will confirm whether the customer still wishes to have a formal complaint recorded. If a complaint is to be recorded, it will be entered into East Waste's complaint register and assigned to the appropriate staff to investigate.

7.2.3 Significant Complaints will be assigned to a Senior Officer to be formally investigated.

7.2.4 Major Complaints will be assigned to the General Manager to be formally investigated. The General Manager will inform the Board of Major Complaints as soon as practicable.

7.3 Investigation

7.3.1 The investigating officer will gather relevant information. This may include:

- interviewing staff or witnesses involved.
- reviewing records (work orders, vehicle footage, logs, emails, policies).
- written statements from the Complainant.
- investigations will be conducted objectively and confidentially.

7.3.2 In instances where a complaint cannot be resolved within two (2) business days from the receipt of the complaint then the Complainant will be provided with regular updates, no later than every 10 business days, about the progress of the complaint.

7.4 Resolution

7.4.1 Upon concluding the investigation, East Waste will aim to resolve the complaint by:

- Correcting errors (e.g. re-performing a missed service, waiving incorrect charges).
- Explaining decisions or clarifying misunderstandings where services met requirements.
- Offering other remedies consistent with policy (for example, service credits or re-scheduling of collection).

7.4.2 East Waste will, where practicable, remedy the situation in a manner which is consistent and fair for both East Waste and the customer(s). The solution chosen will be proportionate and appropriate to the circumstances. Sometimes it may only be possible to offer an apology.

7.4.3 The resolution to Significant Complaints and Major Complaints will be communicated to the Complainant in writing (email or letter) whenever possible. Where a verbal explanation suffices, East Waste will document the outcome for internal record keeping.

7.5 Completion and Follow-Up

7.5.1 After resolution, the outcome of the complaint is to be recorded in East Waste's Complaints Register.

7.5.2 East Waste will inform the Complainant that the complaint has been resolved satisfactorily (e.g. to confirm a service has been corrected) if requested by the Complainant. Significant complaints will be closed out in writing.

7.5.3 Customer satisfaction with the complaint process may be surveyed occasionally for continuous improvement.

8. Escalation and Review

8.1. Escalation to Senior Staff

8.1.1. Where it is not possible to resolve a matter at the initial point of contact and the matter is a complaint, East Waste will escalate the complaint to the appropriate staff member or department. This may occur, for example, when the frontline staff member has been involved in the matter that is the subject of the complaint, or when the complaint is about an issue that requires a decision to be made at an alternate department level, or by a more senior staff member. A senior staff member includes Managers, Business Partners, Coordinators, Team Leaders, Leads and/or Supervisors. Where the complaint is deemed to be Significant or Major, it is escalated to the relevant Senior Officer to investigate.

8.1.2. The Complainant should be informed about this escalation and contact details should be provided.

8.2. Internal Review of an East Waste Decision

8.2.1 Where a complaint is significant and and/or has been escalated to a Senior Officer and the customer is dissatisfied with the outcome, the customer may wish to request an Internal Review of the decision.

8.2.2 An Internal Review of an East Waste decision is available under section 270 of the *Local Government Act 1999*. This is a process established by legislation that enables a council or subsidiary to reconsider all the evidence relied upon to make a decision, including new evidence if relevant.

8.2.3 Requests for an Internal Review should include full details on the decision that the complainant is wanting to be reviewed, the date of the decision, the reason for seeking the decision and the details of the person that made the decision. Request for an Internal Review can be made in writing to the East Waste General Manager at: east@eastwaste.com.

8.2.4 Due to the limited administrative resources at East Waste, requests for internal review may be assigned to an East Waste Constituent Council, or an external body which ensures an additional level of independence and transparency.

8.2.5 The East Waste Board will be notified of any requests for Internal Review. The nature of the Internal Review will be reported in East Waste's Annual Report.

8.3 **External Review**

8.3.1 If the complainant remains dissatisfied after an Internal Review (or if one is not appropriate), they may be directed to their local council or external bodies (such as the Ombudsman SA) for further review, depending on the nature of the complaint.

8.3.2 Information regarding lodging a Complaint with the Ombudsman is available online at www.ombudsman.sa.gov.au or by calling (08) 8226 86 99 or 1800 182 150 (outside metro SA only).

Note: Generally, the Ombudsman prefers a complaint to be addressed by East Waste in the first instance, unless this is not appropriate in the circumstances.

9. Unreasonable Conduct by Complainants

9.1 East Waste is committed to providing fair and respectful complaint handling. However, staff are entitled to a safe working environment. Therefore, East Waste may apply measures to manage unreasonable conduct by Complainants. Unreasonable conduct is persistent or abusive behaviour that hinders proper complaint resolution and places unreasonable demands on resources. Examples include:

- **Unreasonable persistence**: Repeated complaints about the same issue after all remedies have been offered or avenues of review exhausted.
- **Unreasonable demands:** Demands for outcomes beyond East Waste's powers or resources (e.g. demanding the impossible or changing demands frequently).
- **Unreasonable lack of cooperation:** Refusal to provide necessary information, or to engage constructively (e.g. lying, threatening staff, or ignoring procedures).
- **Unreasonable arguments:** Making baseless, irrelevant, or irrational arguments that obstruct resolution.

9.2 When dealing with an unreasonable complainant, East Waste will:

- Warn the Complainant, if possible, about the behaviour and its impact on the process.
- Limit contact to essential communication (for example, no email or phone calls beyond the investigation process).
- If necessary, designate a single point of contact to manage the complaint.
- Ensure all communication remains professional and factual.

9.3 Where a Complainant's behaviour is deemed unreasonable and/or consumes an unwarranted amount of East Waste's resources or impedes the investigation of their complaint, a decision may be made to apply restrictions on contact with the person. Before making any decision to restrict contact, the complainant will be warned that, if the specified behaviour(s) or actions continue, restrictions may be applied. Any action due to unreasonable conduct will be documented.

9.4 Except in extreme cases, East Waste will continue to process the complaint on its merits (focusing on facts rather than the complainant's behaviour) while safeguarding staff and resources.

9.5 Any decision to suspend action on a complaint will be made by the General Manager and communicated in writing (where possible) to the Complainant in addition to advising the East Waste Chair and the Chief Executive Officer of the applicable Constituent Council, if relevant.

10. Alternate Remedies

10.1 If the complaint would be more appropriately dealt with by another process this will be explained to the Complainant at the outset for example:

- Allegations of misconduct, fraud or corruption in public administration.
- Freedom of Information applications.
- Claims for financial compensation e.g. insurance claims.

11. Record Keeping and Reporting

11.1 All complaints, and their outcomes will be recorded in East Waste's Complaints Register. This includes the nature of the complaint, key dates, investigation summary, and resolution. These records are kept confidentially according to the *State Records Act 1997.*

11.2 Annual reports will be prepared for management and the East Waste Board, summarising complaint numbers, types, turnaround times, and any identified service improvements.

12. Legislation

East Waste Charter

Local Government Act 1999

Freedom of Information Act 1991

Public Interest Disclosure Act 2018

Ombudsman Act 1972

State Records Act 1997.

13. Related Documents

Internal Review of Decision Procedure

Public Interest Disclosure Procedure

AS/NZS 10002:2014 “Guidelines for Complaint Management in Organisations”

SA Ombudsman's Complaint Management Framework (2016).

14. Review

This Feedback and Complaints Policy shall be reviewed within four (4) years of issued date or more frequently if legislation or organisational requirements change.

Signed
General Manager

Date

Signed
Chair of East Waste Board

Date

15. Document History

Version No:	Issue Date:	Description of Change:
1.0	June 2023	New Document
2.0	August 2026	Policy aligned to standard practice at East Waste and the recommendations specified in the *SA Ombudsman's Complaint Management Framework (2016)* including a defined process for dealing with unreasonable Complainants.

COMPLAINT HANDLING POLICY

EastWaste

Type	Policy
Category	Governance
Policy Number	16
First Issued/Adopted	June 2023
Minutes Reference	22 June 2023
Review Period	36 months
Last Reviewed	
Next Review	June 2026
Applicable Legislation	• *Local Government Act 1999* • *Freedom of Information Act 1991* • *Public Interest & Disclosures Act 2018* • *Disability Discrimination Act 1992* • *Equal Opportunity Act 1984* • *Ombudsman Act 1972* • *Privacy Act 1988* • *Racial Discrimination Act 1975* • *Work Health and Safety Act* • *Sex Discrimination Act 1984*
Related Documents	• Internal Review of Decision Procedure • Behavioural Standards Policy
Consultation Undertaken	Audit & Risk Management Committee
Responsible Officer	Manager Business Services

SIGNED: .... General Manager

Date: 22/06/2023

.... Chairperson

Date: 22/06/2023

Overview/Purpose

East Waste is committed to achieving customer service excellence by striving to deliver services in a professional, coordinated and timely manner. East Waste is focussed on continuous improvement and proactively looks for all opportunities to improve systems/processes. As such, East Waste recognises that feedback and complaints provide the organisation with an opportunity to improve practices and procedures, as well as resolving matters of concern for our customers.

East Waste will aim to resolve any issues of concern for our customers at the first point of contact wherever possible. However, for issues that are unable to be resolved at the first point of contact, this Policy has been designed to provide a fair, consistent and structured process for East Waste's customers to follow should they wish to lodge a complaint.

Additionally, the Policy sets out the principles and guidelines to be used when addressing complaints made about the actions of East Waste, the Board and Committee members, and/or its Employees.

Definitions

Complaint: An expression of dissatisfaction with a product, service or behaviour delivered by East Waste or its representatives that has failed to reach the standard stated, implied or expected after the initial point of contact. This may include an expression of dissatisfaction about a service that has been, or should have been delivered, but does not include matters outside of East Waste's responsibility.

Employee: Any person performing work on behalf of East Waste, including the General Manager, Managers, Board Members and Employees employed on a full time, part time, casual or contract basis and Persons providing services to, or on behalf of East Waste, even though they may be employed by another party.

Feedback: Can take the form of comments, both positive and negative about services provided by East Waste without necessarily requiring corrective action, change of services or review of decision. Feedback may however, influence future service reviews and delivery methods. East Waste welcomes feedback of all types as an important way of continually improving and monitoring its service standards.

Request for Service: Is an application/request to have East Waste take some form of action to provide a product and/or service.

Customer: A person who is utilising services or products provided by East Waste and includes external customers being any member Council, their staff and/or residents, members of the public or organisations that have any form of dealings with East Waste.

Principles

People Focus: East Waste is open to feedback and/or complaints from all parties including members of the public about decisions, products, services, programs, employees, or the resolution of a complaint.

Transparency: East Waste publicises how and where complaints may be made and will make the process of complaint resolution and investigation easy for complainants to access and understand, whilst being flexible in how complaints may be made to or about East Waste.

Responsiveness: Complaints are acknowledged promptly and addressed according to urgency. The complainant is kept informed throughout the process. East Waste is genuine in its communication and follows through on its promises. East Waste is outcome focussed and will seek a satisfactory resolution wherever possible.

Fairness: To ensure the complaint handling process is fair and reasonable, complaints are dealt with in an equitable, objective and unbiased manner. East Waste will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint is made by them or on their behalf.

Support: East Waste supports and assists customers who want help to provide feedback and/or make a complaint. There are opportunities for internal and external review and/or appeal about the organisation's response to the complaint, and complainants are informed about these avenues when applicable.

Confidentiality: Where possible personal information related to complaints will be kept confidential. The confidentiality of information related to a complaint will be respected with complaints about employees being kept confidential throughout the investigation process.

Accountability: Accountabilities for complaint handling are clearly established, and complaints and responses are monitored and regularly reported to management. East Waste Staff have appropriate authority and guidance to resolve issues that commonly arise in the resolution of complaints. East Waste provides appropriate training, support and resources to employees who are responding to complaints.

Continuous Improvement: Complaints represent an opportunity for improvement in East Waste's internal procedures and processes and support ongoing customer satisfaction monitoring.

Complaint Handling Methodology

East Waste aims to resolve customers queries, concerns and requests for service at the first point of contact wherever possible. However, in circumstances where an issue is unable to be resolved following the initial point of contact and the issue is deemed to be a complaint then the steps outlined may be enacted.

Complaint escalated to a more senior staff member

Where it is not possible to resolve a matter at the initial point of contact and the matter is considered to be a complaint, East Waste staff may escalate the complaint to an appropriate senior staff member. This may occur, for example, when the frontline staff member has been involved in the matter that is the subject of the complaint, or when the complaint is about an issue that is above the staff member's delegation or requires a decision to be made at a more senior level.

A senior staff member includes Managers, Coordinators, Team Leaders and/or supervisors.

Step 2 – Internal review of an East Waste decision

Where a complaint has been escalated to a more senior member of staff and the customer is dissatisfied with the outcome, the customer may wish to request an Internal Review.

An Internal Review of an East Waste decision is available under *Section 270 of the Local Government Act 1999*. This is a process established by Legislation that enables a Council or subsidiary to reconsider all the evidence relied upon to make a decision, including new evidence if relevant.

Requests for an Internal Review should include full details on the decision that the complainant is wanting to be reviewed, the date of the decision, the reason for seeking the decision and the details of the person that made the decision. Request for an Internal Reviews can be made in writing to the East Waste General Manager at one of the following:

Email: east@eastwaste.com
Postal Address: PO Box 26, Mansfield Park SA 5012

Due to the limited administrative resources at East Waste, requests for internal review may be assigned to an East Waste Member Council, which ensures the presence of necessary policies, procedures, and resources. Involving a Member Council also enhances the Internal Review Process by introducing an additional level of independence and transparency. Additionally, the East Waste Board will be notified of any requests for Internal Review.

Submitting a Complaint

No distinction will be made between the method of making the complaint, i.e. whether made online, in person or over the telephone. Complaints made or received through any form of media will be accepted, however, depending on the seriousness and complexity of the complaint, the complainant may be requested to provide further information in a defined form (i.e., in writing), taking into account the individual's circumstances/capability.

To assist East Waste in effectively managing a Complaint the person(s) submitting the Complaint should provide sufficient information to assist East Waste in investigating the concerns including a summary of what the Complaint is about and any relevant key information such as but not limited to:

- Complainants Name & Contact information
- Location
- Date/Time of issue
- East Waste employees name (if applicable/available)

To submit a Complaint please contact East Waste via any of the below options:

Email: east@eastwaste.com
Phone: (08) 8347 5111
Online form: www.eastwaste.com.au
In Writing: East Waste, PO Box 26, Mansfield Park SA 5012

Handling a Complaint

Upon receiving a Complaint East Waste will contact the complainant as soon as possible and within two (2) business days from the time of submission to:

1. Confirm receipt of the Complaint.
2. Resolve the Complaint if possible and/or
3. Seek any additional information that may be required to investigate the Complaint and provide the likely timeframe required to investigate and resolve the Complaint.

In instances where a Complaint cannot be resolved at the point of confirming the receipt of the Complaint then the Complainant will be provided with regular updates about the progress of the Complaint.

Employees will be trained to manage complaints efficiently and effectively, and provided with a level of delegated authority appropriate for the nature of complaints they are expected to resolve.

Remedies

East Waste will, where practicable, remedy the situation in a manner which is consistent and fair for both East Waste and the customer(s). The solution chosen will be proportionate and appropriate to the circumstances. Sometimes, however, it may only be possible to offer an apology.

Complainant rights to external review

While East Waste prefers to work with its customers to resolve complaints quickly and effectively, a complainant will always retain the right to seek other forms of resolution, such as contacting their Member Council, Ombudsman, or taking/seeking legal advice.

Additional information regarding lodging a Complaint with the Ombudsman is available online at www.ombudsman.sa.gov.au or by calling (08) 8226 86 99 or 1800 182 150 (outside metro SA only).

Note: Generally, the Ombudsman prefers a complaint to be addressed by the Council/Subsidiary in the first instance, unless this is not appropriate in the circumstances.

Unreasonable Complainant Conduct

All complaints received by East Waste will be treated seriously and complainants will be treated courteously. However, occasionally the conduct of a complainant can make it challenging to resolve and/or investigate a complaint. This may take the form of unreasonable persistence, unreasonable demands, lack of cooperation or argumentative or threatening behaviour. What can be termed 'unreasonable' will vary depending on a number of factors and East Waste aims to manage these situations in a fair and equitable manner.

Where a complainant's behaviour is deemed unreasonable and/or consumes an unwarranted amount of East Waste's resources or impedes the investigation of their complaint, a decision may be made to apply restrictions on contact with the person. Before making any decision to restrict contact, the complainant will be warned that, if the specified behaviour(s) or actions continue, restrictions may be applied.

Any decision to suspend action on a complaint will be made by the General Manager and communicated in writing (where possible) to the complainant in addition to advising the East Waste Chairperson and the CEO of the applicable member Council, if relevant.

Special Provisions

There are specific procedures which apply to particular types of complaints. If the complaint would be more appropriately dealt with by another process, this will be explained to the complainant at the outset.

For example:

- Complaints against a Board Member, Audit and Risk Management Committee Member, the General Manager or employees under the applicable Behavioural Standards Policy.
- Freedom of Information applications
- Claims for financial compensation e.g., insurance claims
- Persons claiming protection under the *Public Interest Disclosure Act 2018*

Document History:	Version No:	Issue Date:	Description of Change:
	1.0	June 2023	New document, replacing the previous Complaint Handling Policy and the Unreasonable Complainant Conduct Policy.

5.4 Proposed Accountability Policy (Adjourned Item)

Report Author:	Principal Consultant – Clearly Strategic
Responsible Officer:	General Manager
Attachments:	A: Proposed Accountability Policy

Purpose and Context

The proposed Accountability Policy (**Attachment A**) is presented to the Audit & Risk Management Committee for consideration and comment prior to presentation to the East Waste Board for adoption.

Recommendation

That the Audit & Risk Management Committee having considered the proposed Accountability Policy, Item 5.4, Attachment A, Special Audit & Risk Management Committee Meeting 13 August 2026:

1. ***notes that the proposed Accountability Policy establishes a clear framework for accountability where concerns arise regarding the efficient and effective conduct of East Waste's activities, including where those matters have financial implications for Constituent Councils.***
2. ***notes that the proposed Accountability Policy clarifies the respective accountability roles of the Board, the Chair and the General Manager, including that primary responsibility for performance accountability rests with the Chair and the General Manager, while the Board retains its collective governance and decision-making responsibilities under the Charter.***
3. ***provides the following feedback……..***
4. ***recommends that the East Waste Board adopt the proposed Accountability Policy.***

Strategic Link

Objective 5. Provide Leadership

Strategy 5.4 Quality and transparent Corporate (Governance and Financial) activities.

Background

The General Manager provided the following information as part of the General Manager's Update to the East Waste Board (Board) at its meeting of 30 April 2026.

'Request for Compensation

- *Following the resolution of the organics tender the following request has been made by Norwood Payneham & St Peters CEO Mario Barone:*

i. *in the event that there is a difference in the total cost between the additional cost charged by Jeffries from 1 October 2025 and the cost charged by Peats Soils & Garden Products, whether East Waste will reimburse respective Constituent Councils that are affected as a result of the procurement process.*

- *A detailed spreadsheet of these costs was provided to NPSP on request, and to each impacted Constituent Council. The organics contract delay had an impact on five (5) Constituent Councils to a total value of approximately $195K with the NPSP component equating to approximately $30K.*
- *A review of the operational risk register has been completed to ensure recognition of potential Constituent Council claims for reimbursement as a result of East Waste's performance.*
- *Administration is seeking feedback on this request specifically and broadly for future consideration.'*

The Board subsequently resolved:

Moved Cr P George that the Administration prepare a draft Compensation Policy to formalise how Constituent Councils are compensated for liabilities incurred by the operations of East Waste.

Seconded: Mr A Wiguna ***Carried Unanimously***

A draft Compensation Policy was presented to the Audit & Risk Management Committee meeting of 10 June 2026 with the Committee resolving:

That the Audit & Risk Management Committee having considered the draft Constituent Council Compensation Policy, (Item 9.8, Attachment A, Audit & Risk Management Committee Meeting 10 June 2026), do not support the content and request that a simpler approach, with suitable administrative procedures be presented to the September meeting of the Committee.

The Chair of the East Waste Board has provided feedback on the intent of the Policy required by the East Waste Board and accordingly the proposed Accountability Policy is presented to the Committee for consideration and comment.

Discussion

The proposed Accountability Policy (Policy) has been prepared to provide a clear and transparent framework for addressing concerns about the efficient and effective conduct of East Waste's activities.

The Policy responds to the need for a documented process to guide how accountability issues are identified, assessed and addressed, particularly where a matter gives rise to material concern, including concern from one or more Constituent Councils.

The Policy is also intended to clarify how responsibility for such matters may be considered as between the East Waste Board (Board), the Chair and the General Manager, having regard to the Eastern Waste Management Authority Charter (Charter) and the General Manager's contract of employment.

The proposed Policy affirms East Waste's commitment to lawful, ethical, efficient, effective, open and transparent governance and management.

It reflects the Board's obligations under the Charter to ensure that the Authority:

- acts in accordance with applicable laws, the Charter, the Business Plan, the Annual Plan and the adopted Budget.
- acts ethically and with integrity.
- conducts its activities efficiently and effectively.
- manages its affairs in an open and transparent manner, subject to any overriding duty of confidence.

The Policy provides where there is an incident involving inefficient or ineffective performance by the General Manager and/or the General Manager's team that gives rise to material concern, the matter is to be assessed by the Board under the policy framework.

Importantly, the Policy makes clear that such an assessment is not confined to operational responsibility alone. It also allows consideration of whether any aspect of the matter reflects an issue of Board oversight, governance process, or the effectiveness of the Board Chair/ General Manager accountability relationship.

The Policy further clarifies that:

- the General Manager is accountable to the Board for the satisfactory discharge of the responsibilities, duties and functions of the role.
- the Board remains accountable for the discharge of its governance duties under the Charter.
- within that governance framework, the Chair carries primary responsibility to the Board for leadership of Board oversight and performance accountability processes, including ensuring that concerns regarding the performance of the General Manager are identified, raised and addressed appropriately.

In this way, the Policy is intended to strengthen accountability without creating uncertainty about roles. It recognises that primary responsibility for performance accountability rests with the Chair and the General Manager, while preserving the Board's collective governance and decision-making role under the Charter.

The Policy also identifies the practical mechanisms through which accountability may be considered, including:

- the General Manager's annual performance review.
- the General Manager's remuneration review processes.
- Board evaluation processes, including Chair performance where relevant.
- escalation pathways for serious or significant concerns.

Conclusion

The proposed Accountability Policy has been drafted to align with the Eastern Waste Management Authority Charter and to operate alongside the General Manager's contract of employment.

The Policy expressly provides that, where there is any inconsistency between the Policy and the General Manager's contract of employment, the contract will prevail to the extent of the inconsistency.

The Policy supports good governance by documenting how accountability matters may be considered in a structured, transparent and procedurally fair way.

It is recommended that the Audit & Risk Management Committee commend the proposed Accountability Policy to the East Waste Board for adoption.

Version No:	1.0
Issued:	
Next Review:	

Accountability Policy

1. Purpose

1.1. The purpose of this policy is to establish a clear framework for accountability where concerns arise regarding the efficient and effective conduct of East Waste's activities, including where the financial impact of such matters gives rise to concern on the part of one or more Constituent Councils.

1.2. This policy also establishes the process by which the East Waste Board (Board) may assess responsibility for such matters as between the Board, the Chair and the General Manager, in accordance with the Eastern Waste Management Authority Charter (Charter) and the General Manager's contract of employment.

2. Policy Statement

2.1. East Waste is committed to lawful, ethical, efficient, effective, open and transparent governance and management.

2.2. In accordance with Clause 41 of the East Waste Charter, the Board must ensure that:

- the Authority acts in accordance with applicable laws, the Charter, Business Plan, Annual Plan, and achieves the financial outcomes projected in its Budget.
- the Authority acts ethically and with integrity.
- the activities of the Authority are conducted efficiently and effectively and that the assets of the Authority are properly managed and maintained.
- subject to any overriding duty of confidence, the affairs of the Authority are undertaken in an open and transparent manner.

2.3. In accordance with Clause 33.1 of the Charter, Directors must act and take decisions in the best interests of the Authority.

2.4. Where there is an incident involving the inefficient or ineffective performance of duties by the General Manager and/or the General Manager's team, and that incident gives rise to material concern, including concern by one or more Constituent Councils regarding the financial impact of the matter on those Councils, the Board will assess the matter in accordance with this policy.

2.5. That assessment will include consideration of the extent to which responsibility for the inefficiency or ineffectiveness rests with the General Manager in the discharge of executive leadership responsibilities and/or with the Board in the discharge of its governance and oversight responsibilities.

3. General Manager Accountability

3.1 The General Manager is accountable to the East Waste Board for the satisfactory discharge of the responsibilities, duties and functions of the role.

3.2 This includes the obligation to perform the duties of the office with appropriate skill, care and diligence, to act in the best interests of the Authority, to provide full and truthful information in relation to matters relevant to the role, and to carry out duties lawfully, with proper decorum, and to the satisfaction of the Authority.

3.3 Where inefficient or ineffective performance by the General Manager or the General Manager's team reflects a failure of leadership, management, supervision, judgement or oversight, the General Manager may be held accountable for that performance.

4. Board Accountability

4.1 The East Waste Board is accountable for the discharge of its duties under the Charter. This includes accountability for ensuring that East Waste operates efficiently and effectively, acts in the best interests of the Authority, and achieves the financial and governance outcomes required by the Charter and associated plans and budgets.

4.2 Where an incident raises concerns as to inefficiency or ineffectiveness, the Board may also assess whether any aspect of the matter reflects a failure of Board oversight, governance process, or the effectiveness of the Board-Chair/General Manager accountability relationship.

4.3 The Board acknowledges that, within the Board's governance framework, the Chair carries primary responsibility to the Board for leadership of Board oversight and performance accountability processes, including ensuring that concerns regarding the performance of the General Manager are identified, raised and addressed appropriately. In this context, primary responsibility for performance accountability rests with the Chair and the General Manager, with the Board retaining its collective governance and decision-making responsibilities under the Charter.

5. Accountability Mechanisms

The following mechanisms apply under this policy:

5.1 General Manager’s Performance Review

The Board will use the annual performance review process to assess the General Manager's responsibility for any identified inefficiency or ineffectiveness in the discharge of duties, including where such matters have affected organisational outcomes or had financial consequences.

5.2 General Manager’s Remuneration Review

The Board may take such matters into account in reviewing the General Manager's remuneration in accordance with the General Manager's contract of employment.

5.3 Evaluation of Board Performance

The Board will use its Board evaluation process, including assessment of Chair performance where relevant, to consider whether responsibility also arises at the governance or oversight level.

5.4 Escalation of Serious Concerns

Serious or significant concerns may be raised at any time with the Chair of the Board and/or the Chair of the General Manager Performance Review Committee for consideration of appropriate action, including whether contractual provisions relating to serious breach, misconduct or neglect of duty may apply.

6. Circumstances not Otherwise Addressed

6.1 Where an accountability issue arises that is not expressly dealt with in this policy, the Board may determine the action to be taken, consistent with clause 82 of the East Waste Charter.

6.2 Where there is any inconsistency between this policy and the General Manager's contract of employment, the contract prevails to the extent of the inconsistency.

7. Legislation

Criminal Law Consolidation Act 1935

Local Government Act 1999

Independent Commission Against Corruption Act 2012.

8. Related Documents

Eastern Waste Management Authority Charter

Eastern Waste Management Authority Board Code of Conduct

Behaviour Standards Policy

Signed	______________________________	Signed	______________________________
	Chair of East Waste Board		General Manager
Date	______/______/_____	Date	______/______/_____

Document History

Version No:	Issue Date:	Description of Change:
1.0		New Document, August 2026

5.5 Matters Referred to the Committee by the East Waste Board

Report Author:	Principal Consultant – Clearly Strategic
Attachments:	A: The Eastern Waste Management Authority Board Code of Conduct

Purpose and Context

This report presents, for the Audit & Risk Management Committee's (Committee) consideration and recommendation, the matters referred to it by the East Waste Board (the Board). The purpose of the report is to provide the Committee with a clear summary of each referred item, together with the relevant background, issues for consideration, and any implications for governance, risk, compliance, or oversight responsibilities.

Recommendation

That the Audit & Risk Management Committee:

1. ***notes the General Manager's Report as presented on the 13 August 2026.***
2. ***receives Eastern Waste Management Authority Board Code of Conduct (Attachment A, Item 6.1, Special Audit & Risk Management Committee Meeting 13 August 2026) and notes that the East Waste Board has determined that Committee Members are bound by the Code of Conduct.***
3. ***recommends to the East Waste Board that the General Manager's Financial Delegations be as follows:***
    - ***a) Purchasing Limit - $500,000***
    - ***b) Electronic Funds Transfer Limit - $3,000,000***
    - ***c) Credit Card Limit- $5,000.***

Strategic Link

Objective 5. Provide Leadership

Strategy 5.4 Quality and transparent Corporate (Governance and Financial) activities.

Background

The General Manager's Update replaces verbal briefings as the formal mechanism for providing commentary on contemporary matters aligned with East Waste's Strategic Management Plans.

Discussion

The following items are presented for the information and consideration of the Audit & Risk Management Committee:

1. **Appointment of Independent Chair of the Audit & Risk Management Committee**

   Mrs Emma Hinchey's current term as Chair of the Audit & Risk Management Committee (Committee) expires on 30 November 2026. This will be the conclusion of Mrs Hinchey's third distinguished term of service. Ms Hinchey has advised the Independent Chair of the East Waste Board and the General Manager that she will not be seeking reappointment.

The expression of interest process will be coordinated by Allison Ashby of AM Consulting. Ms Ashby has extensive experience in executive recruitment and human resource management.

2. **East Waste Board of Management Board Code of Conduct**

The East Waste Charter, at clause 39.3, requires the East Waste Board to prepare and adopt a Code of Conduct to be observed by Directors.

Board Members and Board Committee Members of East Waste are public officers and as such are required to comply with:

- the *Local Government Act 1999* and associated regulations.
- other applicable legislation, including the *Independent Commission Against Corruption Act 2012, Ombudsman Act 1972* and *Criminal Law Consolidation Act 1935.*
- the East Waste Charter and relevant policies and procedures.

To support clear and consistent compliance with these statutory and Charter obligations, and to reflect contemporary governance practice (including approaches used by other regional subsidiaries such as the Eastern Health Authority), a dedicated East Waste Board of Management Code of Conduct (Code) was adopted by the East Waste Board at their Ordinary Committee Meeting of 25 June 2026. Committee Members are requested to read the attached Code and sign and return the Acknowledgement on page 6 to the Governance Adviser.

3. **General Manager's Financial Delegations**

East Waste Board Meeting 25 June 2026

The Board suggested a review of the General Manager's financial delegations, specifically in relation to the purchasing limit and credit card limit, and whether the current limits should be increased for procurement efficiency. While the existing $250,000 delegation has proven sufficient for individual purchasing transactions through the invoice authorisation process, it has limitations when entering into contractual arrangements with suppliers, particularly multi-year engagements. In these circumstances, the total value of the arrangement over its term may exceed the current purchasing limit, requiring the matter to be referred to the Board for approval.

Increasing the purchasing limit to $500,000 would provide the General Manager with the appropriate authority to manage and approve these contractual arrangements internally, improving efficiency while maintaining appropriate governance oversight

Administration reviewed the Credit Card limit against operational needs and is comfortable with the existing limit, noting that the Administration preference is to minimise utilisation of Credit Cards.

Purchasing limit	means the maximum amount you may spend or commit to spend. Note that this limit applies to the **total** value.
EFT limit	means the payment authority to transfer funds electronically in accordance with the set limit.
Credit Card limit	Means the maximum amount of monies that may be charged to the credit card.

4. Review of the East Waste Charter – Update

At the meeting of 25 June 2026, the East Waste Board resolved that the East Waste Charter (Charter) undergo a compliance review. This review has brought to light a few minor issues that require legal opinion before the revised draft Charter is endorsed by the East Waste Board and considered by the Constituent Councils.

EastWaste

Eastern Waste Management Authority Board Code of Conduct

June 2026

EastWaste

Purpose

This Code of Conduct (Code) is to be observed by all Board Members and Board Committee Members of the Eastern Waste Management Authority, trading as East Waste.

East Waste is a regional subsidiary established by Adelaide Hills Council, the City of Burnside, Campbelltown City Council, the City of Mitcham, the City of Norwood, Payneham & St Peters, the City of Prospect, the City of Unley and the Corporation of the Town of Walkerville for the purpose of the collection and disposal of waste, primarily within the areas of the Constituent Councils.

Board and Committee Members must comply with the provisions in this Code in carrying out their functions as public officials. It is the individual's responsibility to ensure they are familiar with, and comply with, the standards in the Code at all times.

The standards set forth in this Code are supplementary to any legal requirements outlined in the *Local Government Act 1999* or any other applicable Acts or Regulations relevant to the Board and Committee Members of East Waste in carrying out their functions, roles and responsibilities.

Part 1 – Behavioural Code

The following behaviour is considered essential to upholding the principles of good governance in the subsidiary.

1. General Behaviour

Members must:

1.1 at all times act with reasonable care and diligence in the performance and discharge of official functions and duties.

1.2 at all times act honestly in the performance and discharge of official functions and duties.

1.3 act in a way that generates Constituent Council, and community trust and confidence in East Waste.

1.4 act in a reasonable, just, respectful and non-discriminatory way with all people.

1.5 ensure that personal comments to the media or other public comments on East Waste Board decisions and other relevant matters clearly indicate that it is a private view and not that of the Board or Committee.

2. Responsibilities as a Member

2.1 A Member must take reasonable steps to inform themselves about the relevant aspects of the operations and activities.

2.2 Comply with all East Waste policies, codes and resolutions.

2.3 Comply with East Waste's Procedures at Meetings and the Chair's rulings to maintain order and efficiency.

2.4 Make decisions on merit, based on evidence and the Charter's purposes; consider risk, cost, benefit, and community outcomes.

2.5 Deal with information received in their capacity as a Member in a responsible manner.

2.6 Endeavour to provide accurate information to the Board, the Constituent Councils and the public at all times.

2.7 Uphold collective responsibility for resolutions once made, while ensuring any lawful dissent is correctly recorded at the time.

3. Duties of Board Members

3.1 A Member or former Member must not, whether within or outside the State, make improper use of information acquired by virtue of his or her position as a Member to gain, directly or indirectly, an advantage for himself or herself or for another person or to cause detriment to East Waste or its Constituent Councils.

3.2 Not release or divulge information that the Board or Committee has ordered be kept confidential, or that the Member should reasonably know is information that is confidential, including information that is considered by the Board in confidence.

3.3 Not exercise or perform, or purport to exercise or perform, a power, duty or function that he or she is not authorised to exercise or perform.

3.4 Manage records in accordance with the *State Records Act 1997* and East Waste policy.

3.5 Direct media enquiries to the authorised spokesperson unless otherwise resolved by the East Waste Board.

3.6 Not attempt to improperly direct a member of East Waste staff to act in their capacity as a Local Government subsidiary employee for an unauthorised purpose.

4. Conflicts of Interest

In performing and discharging duties Members must:

4.1 Not misuse position or information to gain an advantage for themselves or another, or to cause detriment to East Waste or another.

4.2 Disclose and appropriately manage interests that conflict, or may reasonably be perceived to conflict, with East Waste's interests in accordance with Section 75(D) of the *Local Government Act 1999.*

4.3 Submit Returns to East Waste in accordance with Section 72 of the *Local Government Act 1999.*

4.4 Not solicit any gifts or benefits that could reasonably be seen to create a sense of obligation on the part of the Member or influence the Member in the performance of their duties.

Part 2 – Misconduct of Members

Failure by a Member to comply with this Code constitutes misconduct. The provisions within this Code may refer to statutory matters under the *Local Government Act 1999.* Any breach of these provisions will be investigated under that legislation.

Any person may report an alleged breach of this Code to the Chair of the East Waste Board, the General Manager, the Ombudsman or the Office for Public Integrity. Alleged breaches of this Code made to the Board or to the Office for Public Integrity may be referred to the Ombudsman for investigation under section 263 of the *Local Government Act 1999*, or by the Independent Commissioner Against Corruption.

A report from the Ombudsman that finds a Member has breached the Code of Conduct must be provided to a public meeting of the Board. The Board must pass resolutions that give effect to any recommendations received from the Ombudsman, within two ordinary meetings of the Board following the receipt of such recommendations.

A failure to comply with a finding of inappropriate behaviour (by the Board, independent investigator or Ombudsman) under this Code is also grounds for a complaint under this Code.

A complaint against a Member may also be lodged with the South Australian Civil and Administrative Tribunal under section 264 of the *Local Government Act 1999* on the ground:

a) that the Member has contravened or ailed to comply with an integrity provision.

b) of alleged misbehaviour, repeated misbehaviour or serious misbehaviour by the Member.

c) that the Member has contravened or failed to comply with an order of the Ombudsman.

Any person who believes a breach of this Code of Conduct may have occurred is encouraged to bring details to the attention of the General Manager of East Waste via telephone (8347 5111) or email misconduct@eastwaste.com.

A disclosure of public interest information can be made in accordance with East Waste's Public Interest Disclosure Procedure.

Part 3 - Definitions

In this Code unless the contrary intention appears, these words have the following meaning:

East Waste means the Eastern Waste Management Authority.

Committee means any Committee established by the East Waste Board which is governed by **Terms of Reference.**

East Waste Board means the Directors of the Board of Management of the Eastern Waste Management Authority.

Member means a Director of the East Waste Board or a member of a Committee established by the East Waste Board.

Misconduct means contravention of this Code of Conduct by a Member, while acting in their capacity as a Member, that constitutes a ground for disciplinary action against the Member.

Part 4 – Applicable Legislation

Independent Commissioner Against Corruption Act 2012

Ombudsman Act 1972

Local Government Act 1999

Criminal Law Consolidation Act 1935.

Part 5 – Further Information

Members of the public may access this Code on East Waste's website (www.eastwaste.com) and at East Waste's offices at 1 Temple Court, Ottoway.

For any questions regarding this Code, please contact the General manager of East Waste via telephone (8347 5111) or e-mail (misconduct@eastwaste.com).

Part 6 – Statement of Adoption

This Code of Conduct was adopted by the East Waste Board on 25 June 2026.

East Waste may at any time alter this Code or substitute a new Code of Conduct.

EastWaste

Acknowledgement

I, [Name], a Member of the East Waste Board, acknowledge that I have read, understand and will comply with the Eastern Waste Management Authority Board Code of Conduct, the East Waste Charter, and my statutory duties under the *Local Government Act 1999.*

Signature: ___________________ Date: __________

EastWaste

1 Temple Court
Ottoway SA 5013

08 8347 5111

east@eastwaste.com

EastWasteSA

@East_Waste

East Waste - Eastern Waste
Management Authority

eastwaste.com.au

6.1 Review of the A&RM Committee Terms of Reference

Report Author:	Principal Consultant – Clearly Strategic
Responsible Officer:	General Manager
Attachments:	A: Amended Draft A&RMC Terms of Reference – clean version B: Amended Draft A&RMC Terms of Reference – with tracked changes

Purpose and Context

The purpose of this report is to present the amended draft Audit & Risk Management Committee Terms of Reference for the Committee's review and consideration. During the review of the East Waste Charter (Charter), it was found that the existing Terms of Reference were not fully consistent with the Charter. Amendments have therefore been prepared to address those inconsistencies and update related governance provisions. The report also seeks the Committee's endorsement of the proposed amendments for recommendation to the East Waste Board.

Recommendation

That the Audit & Risk Management Committee:

1. ***notes the amended draft Audit and Risk Management Committee Terms of Reference.***
2. ***endorses the proposed draft amendments to the Audit and Risk Management Committee Terms of Reference as shown in Attachment A, Item 6.1, Special Audit & Risk Management Committee Meeting, 13 August 2026.***
3. ***recommends the amended draft Audit and Risk Management Committee Terms of Reference (Attachment A, Item 6.1, Special Audit & Risk Management Committee Meeting, 13 August 2026) to the East Waste Board for adoption.***

Strategic Link

Objective 5. Provide Leadership

Strategy 5.4 Quality and transparent Corporate (Governance and Financial) activities.

Background

The East Waste Audit & Risk Management Committee (the Committee) is established by the East Waste Board (the Board) in accordance with clause 31 of the *Eastern Waste Management Authority Charter* and Schedule 2, clause 30 of the *Local Government Act 1999* (the Act).

The purpose of the Committee is to provide independent assurance and advice to the Board on accounting, financial management, internal controls, risk management, and governance matters.

The Committee’s Terms of Reference define its purpose, scope, authority, and membership.

The Committee reports to the Board and provides advice and recommendations on matters within its Terms of Reference and statutory functions, thereby supporting informed decision-making and the effective discharge of the Board's responsibilities.

Earlier this year, it was identified that the process for appointing members to the Committee did not align with the provisions of the Act and the Charter. The Terms of Reference have therefore been comprehensively reviewed to ensure legislative compliance and reflect the current functions of the Committee.

Discussion

The Audit & Risk Management Committee Terms of Reference have been updated to reflect revised Internal Audit provisions, including clearer oversight of the Internal Audit Work Plan, internal audit reporting, monitoring of recommendations, and the performance and appointment of the internal auditor.

Further amendments have been made to align the appointment of members with the requirements of the East Waste Charter, including clarification of committee composition and appointment arrangements. The revisions also provide for the establishment of a Nomination Committee to assess and recommend candidates for independent appointments.

The document now includes reference to the Eastern Waste Management Authority Board Code of Conduct, together with minor amendments to improve consistency with the Charter and the Code of Practice - Procedures at Meetings.

In addition, minor formatting, drafting, and grammatical changes have been made to improve clarity and readability. A clean version of the proposed draft Audit & Risk Management Committee Terms of Reference can be found at **Attachment A** to this report.

The key amendments reflected in the amended draft ToR (draft) are summarised below. All proposed amendments may be viewed in **Attachment B** to this report.

1. Independent Chair Arrangements

The draft provides that:

- recruitment and shortlisting of the Independent Chair will be undertaken by an external recruitment agency.
- the successful candidate for the position of Independent Chair is to be determined by the Nomination Committee to have the necessary chairing skills and experience relevant to the functions of the Committee.
- appointment of the Independent Chair will be made by the Constituent Councils on recommendation of the East Waste Board.

This amendment strengthens the governance basis for appointment of the Chair by making clear that the role requires both chairing capability and experience aligned to the Committee's responsibilities.

2. Recruitment of Independent Members

The draft updates the recruitment provision so that shortlisting of Independent Members, other than the Chair, is undertaken by the General Manager through an expression of interest process using appropriate online recruitment methods.

3. Nomination Committee process

The draft introduces a Nomination Committee comprising:

- the Independent Chair of the Audit and Risk Management Committee.
- a Constituent Council Chief Executive Officer.
- a Board Director or Deputy Director.
- the General Manager.

The Nomination Committee is to assess applications and recommend a preferred candidate to the East Waste Board (Board), having regard to the current composition of the Committee and the skills and experience required under the Terms of Reference. The Board will then refer the recommended candidate to the Constituent Councils for consideration in accordance with the requirements of the Charter.

This amendment improves transparency and structure in the appointment process.

4. Removal and cessation of membership

The draft expands the provisions dealing with when a person ceases to be a member of the Committee and the circumstances in which a member may be removed by the Constituent Councils.

These provisions strengthen accountability and clarify membership governance arrangements.

5. Improved governance

The proposed amendments are expected to have a positive governance impact by:

- strengthening appointment criteria for the Chair.
- improving transparency in recruitment and nominations.
- clarifying tenure and removal provisions.
- supporting clearer governance and accountability arrangements.

Conclusion

The proposed amendments to the Audit & Risk Management Committee Terms of Reference represent a positive update to the Committee's governance framework. In particular, the revised provisions relating to Chair capability, recruitment method, nomination arrangements and member tenure are appropriate and support contemporary governance practice.

Version No: 3
Issued:
Next Review:

EastWaste

Terms of Reference

Audit &Risk Management Committee

1. Establishment and Purpose

1.1. The East Waste Audit & Risk Management Committee (the Committee) has been established by the East Waste Board (the Board) in accordance with clause 31 of the Eastern Waste Management Authority Charter (as gazetted on 28 June 2022) and Schedule 2, clause 30 of *the Local Government Act 1999* (the Act).

1.2. The purpose of the Committee is to provide independent assurance and advice to the East Waste Board on accounting, financial management, internal controls, risk management, and governance matters.

1.3. The Committee reports to the Board and provides appropriate advice and recommendations on matters relevant to its Terms of Reference and statutory functions to facilitate informed decision making in relation to the discharge of the Board's responsibilities.

2. Definitions

Unless the context indicates otherwise, the following terms have the following meanings

in these Terms of Reference:

Act means the *Local Government Act 1999.*

Board means the Board of Directors of the Eastern Waste Management Authority.

Chair means the chair of the Committee, appointed in accordance with clause 5 of these Terms of Reference.

Code of Practice –Procedures at Meetings means the Board's Code of Practice – Meeting Procedures or any replacement Code of Practice adopted by the Board for the purpose of the Local Government (Procedures at Meetings) Regulation 2013.

Committee means the Audit & Risk Management Committee established by resolution of the East Waste Board, to be governed by these Terms of Reference.

Member means a member of the Committee.

Nomination Committee means means the committee established by the East Waste Board to assess applications for appointment to the Audit & Risk Management Committee and to recommend preferred candidates to the Board.

Regulations includes the *Local Government (Financial Management) Regulations 2011* and *Local Government (Procedures at Meetings) Regulations 2013.*

3. Functions of the Committee

The primary function of the Committee is to provide independent assurance and advice to the Board on accounting, financial management, internal controls, risk management and governance matters.

In particular the Committee will oversee the following:

3.1. Financial Reporting and Sustainability

3.1.1. Review the annual financial statements to ensure that they provide a true and fair view of the state of affairs of East Waste.

3.1.2. Review the adequacy of the accounting, internal control, reporting and other financial management systems and practices of East Waste on a regular basis.

3.1.3. Propose, and provide information relevant to, a review of East Waste's strategic management plans and annual business plans.

3.1.3.1. Review the Annual Report including the Annual Financial Statements and application of accounting policies and provide an opinion to the Board on whether they present fairly the state of affairs of East Waste and where appropriate, recommend the approval of any material to be included in the Annual Report concerning internal controls and risk management.

3.1.3.2. Review and make recommendations to the Board regarding the assumptions, financial ratios and financial targets in the Long Term Financial Plan.

3.1.4. Provide commentary and advice on the financial sustainability of East Waste and any risks concerning, and as part of the adoption of the Strategic Plans, Long Term Financial Plan, Annual Budget and periodic Budget Reviews.

3.1.5. Review and make recommendations to the Board regarding any other significant financial, accounting, and reporting issues deemed necessary by the Committee, East Waste or Administration.

3.1.6. Consider and provide comment on the financial and risk-related issues associated with any business referred to it by the Board for such comment.

3.2. Internal Controls and Risk Management

3.2.1. Monitor, review and evaluate the effectiveness of policies, systems and procedures established and maintained to identify, assess, monitor, manage and review financial and strategic operational risks.

3.2.2. Monitor and review the effectiveness of East Waste's internal control environment.

3.2.3. Monitor and review the effectiveness of East Waste's internal audit function.

3.3. Internal Audit

3.3.1. Oversee the planning, scope, and review of East Waste's Internal Audit Work Plan, ensuring alignment with the requirements of the Internal Audit Charter.

3.3.2. Review and provide feedback on internal audit reports, findings, and recommendations, together with management responses and reports prepared by East Waste Administration.

3.3.3. Monitor the implementation of internal audit recommendations and management actions, including oversight of any overdue or unresolved matters.

3.3.4. Oversee the performance of the internal auditor and ensure the appointment and engagement process complies with applicable procurement policies and procedures.

3.4. External Audit

Oversee East Waste's engagement with the external auditor including but not limited to:

3.4.1. assessing the external auditor's qualifications and expertise.

3.4.2. recommending the approval of the external auditor's remuneration and terms of engagement to East Waste.

3.4.3. assessing the external auditor's independence and objectivity and monitoring the external auditor's compliance with legislative requirements on the rotation of audit partners.

3.4.4. considering and making recommendations to the Board concerning the appointment, reappointment and removal of the East Waste's external auditor.

3.4.5. if an auditor resigns, the Committee shall investigate the issues leading to this and decide whether any action is required.

3.4.6. liaise with East Waste's external auditor.

3.4.7. review and make recommendations on the Annual Audit Plan, and in particular its consistency with the scope of the external audit engagement as well as the internal audit plan.

3.4.8. reviewing the findings of the audit, paying particular attention to any accounting and audit judgements, any adjusted or unadjusted differences and any other significant issues arising from the audit.

3.4.9. reviewing any representation letter requested by the external auditor before they are signed by management.

3.4.10. reviewing Administration's response to reviews, recommendations and audit letters provided by the External Auditor.

3.5. Other Functions of the Committee

3.5.1. Propose examinations and review examination reports on any matter relating to financial management, or the efficiency and economy with which the Board manages or uses its resources to achieve its objectives, that would not otherwise be addressed or included as part of annual audit and that is considered by the Board to be of such significance as to justify an examination.

3.5.2. Review any report obtained by the East Waste Board under section 48(1) of the Act in accordance with East Waste's Prudential Management Policy, practices and procedures.

3.5.3. Monitor the responsiveness of recommendations for improvement based on previous audits and risk assessments, including those raised by the Board's auditor.

3.5.4. Review East Waste's arrangements and processes for its employees to raise concerns, in confidence, about possible wrongdoing in financial reporting or other matters. The Committee shall ensure these arrangements allow independent investigation of such matters and appropriate follow-up action.

3.5.5. Perform any other function determined by the Board or prescribed by the Regulations.

4. Committee Membership

4.1 Committee Structure and Required Skills

4.1.1 The Committee shall consist of five (5) Members:

- An Independent Chair determined by the Nomination Committee to have the necessary chairing skills and experience relevant to the functions of the committee.
- Two (2) Independent Members determined by the Nomination Committee to have experience relevant to the functions of the Committee.
- One (1) Member of the Board determined by the Board to have experience relevant to the functions of the Committee.
- The appointment of the Independent Chair of the Board to the Committee shall be a standing appointment in accordance with the requirements of the East Waste Charter.

4.1.2 Members of the Committee (when considered as a whole) must have skills, knowledge, and experience relevant to the functions of the Committee, including financial management, risk management, governance, and any other prescribed matter.

4.2 Recruitment and Selection of Independent Members to the Committee

4.2.1 The recruitment of Independent Members is to be undertaken by the General Manager through an expression of interest process using appropriate online recruitment methods.

4.2.2 The Nomination Committee established by the East Waste Board will assess the applications and recommend to the Board the preferred candidate for appointment to the Committee, with reference to the current make-up of the Committee and skills and experience outlined in clause 4.3 of this Terms of Reference.

4.2.3 The term of the appointment for Independent Members, subject to the Act and these Terms of Reference, shall be a period of two years, after which time they will be eligible for re-appointment for a maximum of three two-year terms; being six (6) years in total.

4.3 Appointment of the Board Representative to the Committee

4.31 The selection process for the Board Representative to the Committee shall be in accordance the Code of Practice – Procedures at Meetings.

4.3.2 The Board Representative is to be appointed to the Committee for a term of two (2) years to ensure an orderly rotation and continuity of membership.

4.4 Chairperson and Deputy Chair

4.4.1 The recruitment and shortlisting of the Independent Chair will be undertaken by an external recruitment agency.

4.4.2 The Independent Chair will be appointed by the Constituent Councils, on recommendation of the East Waste Board, for a two (2) year term. The Constituent Councils may decide, by unanimous resolution, to extend the term or reappoint an Independent Member as Chair (noting however that the appointment of the Independent Member to the Committee cannot exceed a maximum consecutive period of six (6) years as per clause 4.4.5 of these Terms of Reference).

4.4.2 The Committee may make an appointment to the position of Deputy Chair for a term of up to two (2) years.

4.4.3 If the Chair is absent from a meeting of the Committee, and a Deputy Chair has not been appointed, an Independent Member will be chosen by those Members present to preside at the meeting as the Acting Chair in accordance with clause 4.15.2 of the Code of Practice – Procedures at Meetings.

4.5 Role of the Chair

The Chair is to

- Oversee the orderly conduct of meetings in accordance with the Act, the Regulations and the Code of Practice - Procedures at Meetings.
- Ensure that all Members have an opportunity to participate in discussions in an open and responsible manner.
- Communicate directly with the internal auditor where required, in relation to internal audit plans, results, and recommendations proposed by the internal auditor.
- Execute, along with the General Manager, the 'Independence of External Audit' certification required under the Regulations as part of the end of financial year audit process.
- Liaise with East Waste administration between meetings regarding the preparation of the Committee's agenda and minutes.

4.6 Removal and Cessation of Committee Members

4.6.1 A person ceases to be a Member of the Committee upon any of the following circumstances occurring:

- the Member's term of office expires and they are not reappointed.
- the Member resigns by written notice to the Board.
- the Member ceases to hold the office which entitles them to be a Member.
- the Member dies or becomes of unsound mind.

4.6.2 Any Member of the Committee may be removed by the Constituent Councils on the grounds that the Member has been absent without leave from three (3) or more consecutive meetings or is not performing duties as required within the objectives and functions of the Committee.

4.6.3 Nothing in these Terms of Reference gives rise to any right of procedural fairness or otherwise derogates from the Constituent Council's ability to remove a Member of the Committee by resolution.

5. Sitting and Professional Fees

5.1 Independent Members of the Committee will receive a sitting fee determined by the Board.

5.2 Sitting fees will be reviewed and set by the Board at the time of the preparation of the Annual Budget having consideration for the Remuneration Tribunal of South Australia's Determination for Local Government Elected Members and CEOs and budgeted CPI.

5.3 Professional fees may be paid for the advice and attendance of the person primarily responsible for the internal audit function External Auditors, and legal and other professionals at the Committee Meetings.

5.4 There are no sitting fees for Board Members appointed to the Committee.

6. Meetings

6.1. Frequency of Meetings

6.1.1 The Committee shall meet at least once per quarter.

6.1.2 A schedule of meetings, including, place, date and time meetings of the Committee will be held, shall be determined by the Committee annually.

6.1.3 The General Manager is delegated the authority to vary the Committee's meeting schedule after liaison with the Chairperson.

6.1.4 Special meetings of the Committee may be called in accordance with the Charter.

6.2 Notice of Meetings

6.1.1 In accordance with the Charter, a notice of each meeting confirming the venue, time, and date, together with an agenda of items to be discussed, shall be forwarded to each member of the Committee no later than three (3) clear days before the date of the meetings. Supporting papers shall, whenever possible, be sent to Committee Members (and to other attendees as appropriate) at the same time.

6.1.2 Notice of meeting, agenda and supporting information will be placed on the East Waste website.

6.2 **Meeting Procedures**

6.2.1 Meetings will be conducted in accordance with East Waste's Code of Practice – Procedures at Meetings.

6.2.2 Members of the public can attend Committee meetings unless prohibited by resolution of the Committee in accordance with section 90(2) of the Act.

6.2.3 A Member of the Committee may attend via electronic means provided that advance notice has been provided to the General Manager and facilities are available.

6.3 **Voting**

6.3.1 Only members of the Committee are entitled to vote in Committee meetings. Unless otherwise required by the Act not to vote, each Member must vote on every matter that is before the Committee for decision. The Chair has a deliberative vote but does not, in the event of an equality of votes, have a casting vote.

6.3.2 All decisions of the Committee shall be made based on the majority decision of the Members present.

6.3.3 If a vote is tied, the matter is considered lost.

6.4 **Meeting Minutes**

6.4.1 Conflict of Interest declarations are required pursuant to sections 73 – 75D of the Act and will be recorded in the minutes.

6.4.2 The General Manager shall ensure that minutes are kept of the proceedings and resolutions of all meetings of the Committee and that the minutes comply with the requirements of the Charter and the Code of Practice - Procedures at Meetings.

6.4.3 Minutes of Committee meetings shall be circulated within seven (7) days after a meeting to all Members of the Committee.

6.4.4 Minutes of the Committee meeting will be placed on the East Waste website.

7 Other Responsibilities

Without derogating from any of the above provisions, the Committee:

7.1 Shall always act in accordance with the East Waste Charter, the Act, the Regulations, the Eastern Waste Management Authority Board Code of Conduct and in accordance with these Terms of Reference in the performance of its functions**.**

7.2 Shall prepare an annual report on the work of the Committee in the 12 months preceding the preparation of the report, to be presented to the Board in August of each year and to be made publicly available via the East Waste Annual Report.

7.3 Undertake an annual self-assessment.

8 Tenure

The Committee will continue in existence in accordance with the Act.

9 Legislation

Local Government Act 1999

Local Government (Financial Management) Regulations 2011

Local Government (Procedures at Meetings) Regulations 2013

10 Related Documents

East Waste Charter

Eastern Waste Management Authority Board Code of Conduct

East Waste Code of Practice – Procedures at Meetings

11 Review

11.1 The Committee shall, at least every four (4) years, review its Terms of Reference, so that it is operating at maximum effectiveness and recommend any changes it considers necessary to the Board for approval

11.2 The Board may review and amend these Terms of Reference at any time.

12 Record of Adoption

Signed	Signed
General Manager	Chair of East Waste Board
Date	Date

13 Document History

Version No:	Issue Date:	Description of Change:
1.0		
2.0	21/11/24	Content updated and placed in new format
3.0	13/08/2026	Appointment of Members aligned with requirements of the East Waste Charter; formation of Nomination Committee for Independent Appointments, inclusion of reference to the Eastern Waste Management Authority Board Code of Conduct, minor formatting and grammatical amendments.

EastWaste

Version No:
Issued:
Next Review:

Terms of Reference

Audit &Risk Management Committee

1. Establishment and Purpose

1.1. The East Waste Audit & Risk Management Committee (the Committee) has been established by the East Waste Board (the Board) in accordance with clause 31 of the Eastern Waste Management Authority Charter (as gazetted on 28 June 2022) and Schedule 2, clause 30 of *the Local Government Act 1999* (the Act).

1.2. The purpose of the Committee is to provide independent assurance and advice to the East Waste Board on accounting, financial management, internal controls, risk management, and governance matters.

1.3. The Committee reports to the Board and provides appropriate advice and recommendations on matters relevant to its Terms of Reference and statutory functions to facilitate informed decision making in relation to the discharge of the Board's responsibilities.

2. Definitions

Unless the context indicates otherwise, the following terms have the following meanings

in these Terms of Reference:

Act means the *Local Government Act 1999.*

Board means the Board of Directors of the Eastern Waste Management Authority.

Chair~~person~~ means the chair~~person~~ of the Committee, appointed in accordance with clause 5 of these Terms of Reference.

Code of Practice –Procedures at Meetings means the Board's Code of Practice – Meeting Procedures or any replacement Code of Practice adopted by the Board for the purpose of the Local Government (Procedures at Meetings) Regulation 2013.

Committee means the Audit & Risk Management Committee established by resolution of the East Waste Board, to be governed by these Terms of Reference.

Member means a member of the Committee.

Nomination Committee means means the committee established by the East Waste Board to assess applications for appointment to the Audit & Risk Management Committee and to recommend preferred candidates to the Board.

Regulations includes the *Local Government (Financial Management) Regulations 2011* and *Local Government (Procedures at Meetings) Regulations 2013.*

3. Functions of the Committee

The primary function of the Committee is to provide independent assurance and advice to the Board on accounting, financial management, internal controls, risk management and governance matters.

In particular the Committee will oversee the following:

3.1. Financial Reporting and Sustainability

3.1.1. Review the annual financial statements to ensure that they provide a true and fair view of the state of affairs of East Waste.

3.1.2. Review the adequacy of the accounting, internal control, reporting and other financial management systems and practices of East Waste on a regular basis.

3.1.3. Propose, and provide information relevant to, a review of East Waste's strategic management plans and annual business plans.

3.1.3.1. Review the Annual Report including the Annual Financial Statements and application of accounting policies and provide an opinion to the Board on whether they present fairly the state of affairs of East Waste and where appropriate, recommend the approval of any material to be included in the Annual Report concerning internal controls and risk management.

3.1.3.2. Review and make recommendations to the Board regarding the assumptions, financial ratios and financial targets in the Long Term Financial Plan.

3.1.4. Provide commentary and advice on the financial sustainability of East Waste and any risks concerning, and as part of the adoption of the Strategic Plans, Long Term Financial Plan, Annual Budget and periodic Budget Reviews.

3.1.5. Review and make recommendations to the Board regarding any other significant financial, accounting, and reporting issues deemed necessary by the Committee, East Waste or Administration.

3.1.6. Consider and provide comment on the financial and risk-related issues associated with any business referred to it by the Board for such comment.

3.2. Internal Controls and Risk Management

3.2.1. Monitor, review and evaluate the effectiveness of policies, systems and procedures established and maintained to identify, assess, monitor, manage and review financial and strategic operational risks.

3.2.2. Monitor and review the effectiveness of East Waste's internal control environment.

3.2.3. Monitor and review the effectiveness of East Waste's internal audit function.

3.3. Internal Audit

3.3.1. Oversee the planning, scope, and review of East Waste's Internal Audit Work Plan, ensuring alignment with the requirements of the Internal Audit Charter.

3.3.2. Review and provide feedback on internal audit reports, findings, and recommendations, together with management responses and reports prepared by East Waste Administration.

3.3.3. Monitor the implementation of internal audit recommendations and management actions, including oversight of any overdue or unresolved matters.

3.3.4. Oversee the performance of the internal auditor and ensure the appointment and engagement process complies with applicable procurement policies and procedures.

~~3.3.1. Provide oversight of planning and scoping of the internal audit work plan and review and comment on reports provided by the person primarily responsible for the internal audit function.~~

~~3.3.2. Monitor the responsiveness to recommendations for improvements based on previous audits and risk assessments, including those raised by East Waste's auditor.~~

3.4. External Audit

Oversee East Waste's engagement with the external auditor including but not limited to:

3.4.1. assessing the external auditor's qualifications and expertise.

3.4.2. recommending the approval of the external auditor's remuneration and terms of engagement to East Waste.

3.4.3. assessing the external auditor's independence and objectivity and monitoring the external auditor's compliance with legislative requirements on the rotation of audit partners.

3.4.4. considering and making recommendations to the Board concerning the appointment, reappointment and removal of the East Waste's external auditor.

3.4.5. if an auditor resigns, the Committee shall investigate the issues leading to this and decide whether any action is required.

3.4.6. liaise with East Waste's external auditor.

3.4.7. review and make recommendations on the Annual Audit Plan, and in particular its consistency with the scope of the external audit engagement as well as the internal audit plan.

3.4.8. reviewing the findings of the audit, paying particular attention to any accounting and audit judgements, any adjusted or unadjusted differences and any other significant issues arising from the audit.

3.4.9. reviewing any representation letter requested by the external auditor before they are signed by management.

3.4.10. reviewing Administration's response to reviews, recommendations and audit letters provided by the External Auditor.

3.5. Other Functions of the Committee~~Matters~~

3.5.1. Propose examinations and review examination reports on any matter relating to financial management, or the efficiency and economy with which the Board manages or uses its resources to achieve its objectives, that would not otherwise be addressed or included as part of annual audit and that is considered by the Board to be of such significance as to justify an examination.

3.5.2. Review any report obtained by the East Waste Board under section 48(1) of the Act in accordance with East Waste's Prudential Management Policy, practices and procedures.

3.5.3. Monitor the responsiveness of recommendations for improvement based on previous audits and risk assessments, including those raised by the Board's auditor.

3.5.4. Review East Waste's arrangements and processes for its employees to raise concerns, in confidence, about possible wrongdoing in financial reporting or other matters. The Committee shall ensure these arrangements allow independent investigation of such matters and appropriate follow-up action.

3.5.5. Perform any other function determined by the Board or prescribed by the Regulations.

4. Committee Membership

~~**4.1. Members of the Committee shall be appointed by the Board in accordance with these Terms of Reference.**~~

4.1 Committee Structure and Required Skills

~~**4.2.**~~ 4.1.1 The Committee shall consist of five (5) Members**:**

- ~~4.2.1.~~ An Independent Chair~~person~~ determined by the Nomination Committee to have the necessary chairing skills and experience relevant to the functions of the committee.
- ~~4.2.2.~~ Two (2) Independent Members determined by the Nomination Committee to have experience relevant to the functions of the Committee.
- ~~4.2.3.~~ One (1) Member of the Board determined by the Board to have experience relevant to the functions of the Committee.
- ~~4.2.4.~~ The appointment of the Independent Chair~~person~~ of the Board to the Committee shall be a standing appointment in accordance with the requirements of the East Waste Charter.

4.1.2 Members of the Committee (when considered as a whole) must have skills, knowledge, and experience relevant to the functions of the Committee, including financial management, risk management, governance, and any other prescribed matter.

~~**4.3.**~~ 4.2

~~**4.4.**~~ **~~Appointment~~ Recruitment and Selection of Independent Members to the Committee**

~~4.4.1~~ 4.2.1 The recruitment of Independent Members is to be undertaken by the General Manager through an expression of interest process using appropriate online recruitment methods.

4.2.2 The Nomination Committee established by the East Waste Board will assess the applications and recommend to the Board the preferred candidate for appointment to the Committee, with reference to the current make-up of the Committee and skills and experience outlined in clause 4.3 of this Terms of Reference.

4.2.3 The term of the appointment for Independent Members, subject to the Act and these Terms of Reference, shall be a period of two ~~(2)~~ years, after which time they will be eligible for re-appointment for a maximum of three two-year terms; being six (6) years in total.

~~**4.4**~~

4.3 Appointment of the Board Representative to the Committee

4.31 The selection process for the Board Representative to the Committee shall be in accordance the Code of Practice – Procedures at Meetings.

4.3.2 The Board Representative is to be appointed to the Committee for a term of two (2) years to ensure an orderly rotation and continuity of membership.

~~**4.5** Independent Members are eligible for reappointment at the expiration of their term of office at the sole discretion of the Board. An ndependent Member may be appointed for a maximum of three (3) consecutive terms.~~

~~**4.6** An Independent Member who has served three (3) consecutive, two (2) year terms is eligible to reapply two (2) years after the expiry of their three (3) terms unless, appointed by the Board following an expression of interest process.~~

~~A person ceases to be a Member of the Committee upon any of the following circumstances occurring:~~

~~the Member's term of office expires and they are not reappointed.~~

~~the Member resigns by written notice to the Board.~~

~~the Member ceases to hold the office which entitles them to be a Member.~~

~~the Member dies or becomes of unsound mind.~~

~~**4.7** Any Member of the Committee may be removed on the grounds that the Member has been absent without leave from three (3) or more consecutive meetings or is not performing duties as required within the objectives and functions of the Committee.~~

~~**4.8** Nothing in these Terms of Reference gives rise to any right of procedural fairness or otherwise derogates from the Board's ability to remove a Member of the Committee by resolution.~~

4.4 Chairperson and Deputy Chair ~~Independent Chairperson~~

4.4.1 The recruitment and shortlisting of the Independent Chair will be undertaken by an external recruitment agency.

~~4.5.~~ 4.4.2 The Independent Chair~~person~~ will ~~be an Independent Member~~ be appointed by the ~~Board~~ Constituent Councils, on recommendation of the East Waste Board, for a two (2) year term. The ~~Board~~ Constituent Councils may decide, by unanimous resolution, to extend the term or reappoint an Independent Member as Chair~~person~~ (noting however that the appointment of the Independent Member to the Committee cannot exceed a maximum consecutive period of six (6) years as per clause 4.4.5 of these Terms of Reference~~10~~).

~~4.6.~~4.4.2 The Committee may make an appointment to the position of Deputy Chair~~person~~ for a term of up to two (2) years.~~.~~

4.4.3 If the Chair~~person~~ is absent from a meeting of the Committee, and a Deputy Chair has not been appointed, ~~-~~an Independent Member will be chosen ~~from~~ by those Members present to preside at the meeting as the Acting Chair~~person~~ in accordance with clause 4.15.2 of the Code of Practice – Procedures at Meetings.~~.~~

~~4.7.~~4.5 Role of the Chair

~~4.8.~~ The Chair ~~person~~ is to

~~4.8.1.~~
- Oversee the orderly conduct of meetings in accordance with the Act, the Regulations and the Code of Practice - Procedures at Meetings.
- Ensure that all Members have an opportunity to participate in discussions in an open and responsible manner.
- Communicate directly with the internal auditor where required, in relation to internal audit plans, results, and recommendations proposed by the internal auditor.
- Execute, along with the General Manager, the ‘Independence of External Audit’ certification required under the Regulations as part of the end of financial year audit process.

~~4.8.2.~~

- Liaise with East Waste administration between meetings regarding the preparation of the Committee’s agenda and minutes.

~~4.8.3.~~

~~4.8.4. Nominate a Member of the Committee who is also a Member of the Board to present the unconfirmed minutes of Committee meetings.~~

~~Execute, along with the General Manager, the ‘Independence of External Audit’ certification required under the Regulations as part of the end of financial year audit process.~~

4.6 Removal and Cessation of Committee Members

4.6.1 A person ceases to be a Member of the Committee upon any of the following circumstances occurring:

- the Member’s term of office expires and they are not reappointed.
- the Member resigns by written notice to the Board.
- the Member ceases to hold the office which entitles them to be a Member.

- the Member dies or becomes of unsound mind.

4.6.2 Any Member of the Committee may be removed by the Constituent Councils on the grounds that the Member has been absent without leave from three (3) or more consecutive meetings or is not performing duties as required within the objectives and functions of the Committee.

4.6.3 Nothing in these Terms of Reference gives rise to any right of procedural fairness or otherwise derogates from the Constituent Council's ability to remove a Member of the Committee by resolution.

~~4.8.5.~~

~~4~~5. Sitting and Professional Fees

~~4.9.~~5.1 Independent Members of the Committee will receive a sitting fee determined by the Board.

~~4.10.~~5.2 Sitting fees will be reviewed and set by the Board at the time of the preparation of the Annual Budget having consideration for the Remuneration Tribunal of South Australia's Determination for Local Government Elected Members and CEOs and budgeted CPI.~~.~~

~~4.11.~~5.3 Professional fees may be paid for the advice and attendance of the person primarily responsible for the internal audit function External Auditors, and legal and other professionals at the Committee Meetings.

~~4.12.~~5.4 There are no sitting fees for Board Members appointed to the Committee.

~~5~~

~~5.~~6. Meetings

~~5.1.~~6.1. Frequency of Meetings

~~5.1.1.~~ 6.1.1 T~~T~~he Committee shall meet at least once per quarter.

~~5.1.2.~~ 6.1.2 A schedule of meetings, including, place, date and time meetings of the Committee will be held, shall be determined by the Committee annually.

~~5.1.3.~~ 6.1.3 The General Manager is delegated the authority to vary the Committee's meeting schedule after liaison with the Chairperson.

~~5.1.4.~~6.1.4 Special meetings of the Committee may be called in accordance with the Charter.~~ Act.~~

~~5.2.~~6.2 Notice of Meetings

~~5.2.1.~~6.1.1 In accordance with ~~section 87 of the Act~~the Charter, a notice of each meeting confirming the venue, time, and date, together with an agenda of items to be discussed, shall be forwarded to each member of the Committee no later than three (3) clear days before the date of the meetings. Supporting papers shall, whenever possible, be sent to Committee Members (and to other attendees as appropriate) at the same time.

~~5.2.2.~~6.1.2 Notice of meeting, agenda and supporting information will be placed on the East Waste website.

~~5.3.~~6.2 Meeting Procedures

~~5.3.1.~~6.2.1 Meetings will be conducted in accordance with East Waste's Code of Practice –Procedures at Meetings.

~~5.3.2.~~6.2.2 Members of the public can attend Committee meetings unless prohibited by resolution of the Committee in accordance with section 90(2) of the Act.

~~5.3.3.~~6.2.3 A Member of the Committee may attend via electronic means provided that advance notice has been provided to the General Manager and facilities are available.

~~5.4.~~6.3 Voting

~~5.4.1.~~6.3.1 Only members of the Committee are entitled to vote in Committee meetings. Unless otherwise required by the Act not to vote, each Member must vote on every matter that is before the Committee for decision. The Chair ~~person~~ has a deliberative vote but does not, in the event of an equality of votes, have a casting vote.

~~5.4.2.~~6.3.2 All decisions of the Committee shall be made based on the majority decision of the Members present.

6.3.3 If a vote is tied, the ~~the matter may be referred back to the Committee (with or without additional information to inform the debate and decision making) or referred to the Board for decision.~~ matter is considered lost.

~~5.5.~~6.4 Meeting Minutes

~~5.5.1.~~6.4.1 Conflict of Interest declarations are required pursuant to sections 73 – 75D of the Act and will be recorded in the minutes.

~~5.5.2.~~6.4.2 The General Manager shall ensure that minutes are kept of the proceedings and resolutions of all meetings of the Committee and that the minutes comply with the requirements of the ~~Regulations~~ Charter and the Code of Practice - Procedures at Meetings.

~~5.5.3.~~6.4.3 Minutes of Committee meetings shall be circulated within seven (7) days after a meeting to all Members of the Committee.

~~5.5.4.~~6.4.4 Minutes of the Committee meeting will be placed on the East Waste website.

~~6~~7 Other Responsibilities

Without derogating from any of the above provisions, the Committee:

~~5.6.~~7.1 Shall always act in accordance with the East Waste Charter, the Act, the Regulations, the Eastern Waste Management Authority Board Code of Conduct and in accordance with these Terms of Reference in the performance of its functions.

~~5.7.~~7.2 Shall prepare an annual report on the work of the Committee in the 12 months preceding the preparation of the report, to be presented to the Board in August of each year and to be made publicly available via the East Waste Annual Report.

~~5.8.~~7.3 Undertake an annual self-assessment.

~~7~~8 Tenure

The Committee will continue in existence in accordance with the Act.

~~8~~9 Legislation

Local Government Act 1999

Local Government (Financial Management) Regulations 2011

Local Government (Procedures at Meetings) Regulations 2013

~~9~~10 Related Documents

East Waste Charter

Eastern Waste Management Authority Board Code of Conduct

East Waste Code of Practice – Procedures at Meetings

~~10~~11 Review

~~10.1~~11.1 The Committee shall, at least every four (4) years, review its Terms of Reference, so that it is operating at maximum effectiveness and recommend any changes it considers necessary to the Board for approval

11.2 The Board may review and amend these Terms of Reference at any time.

12 Record of Adoption

Signed	Signed
General Manager	Chair of East Waste Board
Date	Date

~~6.~~13 Document History

Version No:	Issue Date:	Description of Change:
1.0		
2.0	21/11/24	Content updated and placed in new format
3.0	13/08/2026	Appointment of Members aligned with requirements of the East Waste Charter; formation of Nomination Committee for Independent Appointments, inclusion of reference to the Eastern Waste Management Authority Board Code of Conduct, minor formatting and grammatical amendments.

6.2 Draft Public Consultation Policy

Report Author:	Principal Consultant – Clearly Strategic
Responsible Officer:	General Manager
Attachments:	A: Draft Public Consultation Policy

Purpose and Context

The draft Public Consultation Policy (**Attachment A**) is presented to the Audit & Risk Management Committee for review. The Policy has been prepared to support East Waste's obligation under clause 39.1.3 of the East Waste Charter to prepare, adopt and keep under review a policy on public consultation that conforms with section 50 of the *Local Government Act 1999* and is consistent with the *Community Engagement Charter* published by the Local Government Association of South Australia.

The draft Policy establishes a framework for how East Waste will undertake public consultation and community engagement when required by law, by the East Waste Charter, or where the East Waste Board determines consultation is appropriate. It sets out consultation principles, categories of consultation, matters that may require consultation, how feedback will be considered, and administrative responsibility for implementation.

Overall, the draft Policy provides a sound governance framework that is appropriate to East Waste's role as a regional subsidiary.

Recommendation

> ***That the Audit & Risk Management Committee endorses the Draft Public Consultation Policy,(Item 6.3, Attachment A, Special Audit & Risk Management Committee Meeting 13 August 2026), subject to minor drafting, formatting and administrative amendments that do not materially alter the intent of the policy, and recommends the draft Policy to the East Waste Board for adoption.***

Strategic Link

Objective 5. Provide Leadership

Strategy 5.4 Quality and transparent Corporate (Governance and Financial) activities.

Background

East Waste is a regional subsidiary established under the *Local Government Act 1999* and governed in accordance with the East Waste Charter.

Under clause 39.1.3 of the Charter, East Waste must, in consultation with the Constituent Councils, prepare and adopt, and thereafter keep under review, a policy on public consultation. The policy must conform with section 50 of the Act and be consistent with the *Community Engagement Charter* published by the Local Government Association of South Australia.

Discussion

The draft Policy applies to decisions, activities and processes of East Waste where consultation or community engagement is required by law, the *Community Engagement Charter*, the East Waste Charter, or otherwise determined by the East Waste Board to be appropriate.

It recognises the distinct role of East Waste as a regional subsidiary and acknowledges that not all consultation matters relevant to Constituent Councils will arise in the same way for East Waste.

The draft Policy states that East Waste will undertake consultation in a manner that is lawful, proportionate, accessible and appropriate to the significance and likely impact of the matter under consideration. It adopts the key principles of the *Community Engagement Charter*, including timely access to information, plain language communication, meaningful opportunities for participation, and transparency about how views have been considered.

The draft Policy also introduces consultation categories - Significant, Standard, Local and Inform - and identifies consultation methods that may be used depending on the nature of the matter. These include publication on the East Waste website, direct notice to Constituent Councils and stakeholders, public meetings or briefings, surveys, and explanatory material about proposals and decision-making.

In addition, the draft Policy clarifies that consultation informs decision-making but does not bind East Waste to adopt a particular view. Consultation is intended to inform Board decisions and that feedback will be considered alongside other relevant factors such as legal obligations, operational requirements, financial implications, risk and strategic objectives.

The draft Public Consultation Policy assigns responsibility for implementation and administration to the General Manager unless otherwise determined by the East Waste Board.

Conclusion

The Draft Public Consultation Policy provides East Waste with an appropriate and practical framework for consultation and community engagement. It is aligned with the East Waste Charter and relevant legislative requirements, supports transparency, informed decision-making, and recognises the operational context of East Waste as a regional subsidiary.

The policy is considered suitable for endorsement by the Audit & Risk Management Committee and referral to the East Waste Board for adoption.

EastWaste

Version No:	**1.0**
Issued:	
Next Review:	

Public Consultation Policy

1. Introduction

1.1. The Eastern Waste Management Authority, trading as East Waste, is a regional subsidiary established under the *Local Government Act 1999* (Act) and is governed in accordance with the East Waste Charter.

1.2. Under clause 39.1.3 of the East Waste Charter, the Authority must, in consultation with the Constituent Councils, prepare and adopt and thereafter keep under review a policy on public consultation, as would conform to section 50 of the Act. The Policy needs to be consistent with the Community Engagement Charter (Charter) as published by the **L**ocal Government Association (SA).

1.3. The purpose of this Policy is to establish how East Waste will undertake public consultation and community engagement where required by law, and where the Board determines that consultation is appropriate in the interests of good governance, transparency and informed decision-making.

2. Scope

2.1. This policy applies to decisions, activities and processes of East Waste where public consultation or community engagement is:

- required by the *Local Government Act 1999.*
- required by the *Community Engagement Charter* established by under section 50 of the Act.
- required by the East Waste Charter.
- otherwise determined by the East Waste Board to be appropriate.

2.2. This Policy applies to East Waste acting through the Board, the General Manager, or any delegate acting on behalf of East Waste.

3. Policy Statement

3.1. East Waste will undertake public consultation in a manner that is lawful, proportionate, accessible and appropriate to the significance and impact of the matter under consideration.

3.2. In doing so, East Waste will have regard to the principles in the Community Engagement Charter, including that:

- Constituent Councils should have reasonable, timely, meaningful and ongoing opportunities to access information and participate in relevant processes.

- information should be in plain language, readily accessible and in a form that facilitates participation.
- engagement methods should foster constructive dialogue, discussion and debate.
- engagement methods should be appropriate having regard to the significance and likely impact of the matter.
- insofar as is reasonable, the Constituent Councils should be informed about how their views were considered and the reasons for decisions or actions.

4. Consultation Categories

4.1. Where consultation is required by the Community Engagement Charter, East Waste will comply with the applicable category and mandatory minimum requirements prescribed by that Charter as follows:

Type	Definition	Examples
Significant	Decisions of the East Waste Board that will have a significant impact on most or all the Constituent Councils.	Adoption of Annual Plan Imposing a separate service charge.
Standard	Decisions of the East Waste Board that will benefit from Constituent Council input.	Opening hours of principal office – substantial change. Policy review and development.
Local	Decisions that impact an identifiable smaller group of Constituent Councils or a local area.	Change to collection day/route.
Inform	Matters where East Waste will provide information to a Constituent Council impacted by a decision.	Opening hours of principal office – minor change.

4.2. To the extent relevant to East Waste, consultation undertaken under this Policy will use one or more of the following methods, as appropriate to the category of matter and the nature of East Waste's functions:

- publication of information on the East Waste website.
- direct notice to Constituent Councils and relevant stakeholders.
- public meetings, information sessions or briefings.
- surveys or other feedback mechanisms.

- publication of information explaining the proposal, its purpose, and how feedback will inform the decision.

4.3. For matters categorised as Significant East Waste will provide a minimum consultation period of 21 days, unless a longer period is required by law.

5. Matters for Consultation

5.1. East Waste will undertake consultation where required by law.

5.2. East Waste recognises that, unlike a Constituent Council, not all matters listed in the Community Engagement Charter will necessarily arise in the same way for a regional subsidiary. Accordingly, this Policy applies to those statutory or governance matters that are relevant to East Waste from time to time.

5.3. Without limitation, East Waste may undertake consultation in relation to:

- policies or decisions for which consultation is required by the *Local Government Act 1999* or another applicable law.
- matters affecting service delivery, operations or stakeholders where the Board considers consultation to be desirable.
- strategic or governance matters where consultation would assist transparency or informed decision-making.

5.4. Nothing in this Policy prevents East Waste from undertaking consultation in circumstances where consultation is not legally required.

6. Decision – making and Consideration of Feedback

6.1. Consultation undertaken under this Policy does not require East Waste to adopt the view preferred by submitters.

6.2. The purpose of consultation is to inform decision-making. Feedback received will be considered by the relevant decision-maker before a decision is made, together with any other relevant considerations, including legal obligations, financial implications, operational requirements, strategic objectives, risk, technical advice and the interests of the Authority as a whole.

6.3. Consistent with Clause 33.1 of the East Waste Charter, the East Waste Board must act in the best interests of the Authority when making decisions following consultation.

6.4. Where reasonable and appropriate, East Waste will provide information about how feedback was considered and the reasons for the decision.

7. Administration

7.1. Unless otherwise determined by the East Waste Board, the General Manager is responsible for the implementation and administration of this Policy, including arranging consultation processes and reporting outcomes to the Board.

7.2. The Board may determine the consultation approach for any matter, or delegate responsibility for implementation to the General Manager or another lawful delegate, subject to the East Waste Charter and any applicable law.

7.3. If circumstances arise that are not addressed by this Policy, the Board may determine the action to be taken, consistent with Clause 82 of the East Waste Charter.

8. Legislation

Local Government Act 1999

Local Nuisance and Litter Control Act 2016

9. Related Documents

Eastern Waste Management Authority Charter

Community Engagement Charter (LGA SA)

10. Review

10.1 This Policy will be reviewed every four years and following any material legislative or operational change. Reviews will be undertaken in consultation with the Constituent Councils where required by the Eastern Waste Management Authority Charter.

Signed	Signed
General Manager	Chair of East Waste Board
Date	Date

11. Document History

Version No:	Issue Date:	Description of Change:
1.0	September 2026	Draft Public Consultation Policy

6.3 Draft Protection of the Environment Policy

Report Author:	Principal Consultant – Clearly Strategic
Responsible Officer:	General Manager
Attachments:	A: Draft Protection of the Environment Policy

Purpose and Context

This report presents the Draft Protection of the Environment Policy (**Attachment A**) for the Audit & Risk Management Committee's consideration.

The Draft Protection of the Environment Policy (Policy) has been prepared to meet East Waste's obligation under clause 39.1.6 of the Eastern Waste Management Authority Charter to prepare, adopt and keep under review a policy on the protection of the environment.

The Policy provides a clear governance framework for how East Waste will manage the environmental impacts associated with waste collection and transport activities undertaken on behalf of its Constituent Councils. It sets out commitments relating to pollution prevention, lawful waste transport, resource recovery, environmental risk management, incident response, and ongoing monitoring and review.

Recommendation

That the Audit & Risk Management Committee having considered the draft Protection of the Environment Policy, Item 6.4, Attachment A, Special Audit & Risk Management Committee Meeting 13 August 2026:

1. ***endorses the Draft Protection of the Environment Policy, subject to minor drafting, formatting and administrative amendments that do not materially alter the intent of the Policy and recommends the draft Policy to the East Waste Board for adoption.***
2. ***requests that Administration ensure relevant supporting procedures, reporting mechanisms, and implementation responsibilities are aligned with the Policy.***

Strategic Link

Objective 5. Provide Leadership

Strategy 5.4 Quality and transparent Corporate (Governance and Financial) activities.

Background

East Waste operates waste and recyclable collection and transport services on behalf of its Constituent Councils. These functions inherently involve environmental risks, including; litter, spills, leaks, odour, noise, emissions, contamination, and the improper handling of hazardous or prohibited materials.

The Policy has been developed in recognition of those risks and of East Waste's responsibility to minimise environmental harm while supporting resource recovery and lawful service delivery.

The Policy is framed with reference to:

- the Eastern Waste Management Authority Charter
- the *Environment Protection Act 1993* (SA)
- the *Environment Protection (Waste to Resources) Policy 2010* (SA)
- the *Environment Protection (Movement of Controlled Waste) Policy 2014*
- the National Waste Policy 2018: Less Waste, More Resources
- other relevant licences, approvals, codes, standards and guidelines.

Consideration was also given to similar policies within like organisations i.e. Veolia Australia and New Zealand and Solo Resource Recovery.

Discussion

The Policy establishes a practical and organisation-wide statement of East Waste's environmental commitments. It applies to employees, contractors, and labour-hire personnel, and covers vehicles, plant, depots, workshops, operational sites, and all services delivered on behalf of Constituent Councils.

The Policy commits East Waste to:

- protecting the environment by preventing pollution and environmental harm.
- managing waste responsibly through safe collection, transport, containment, and delivery to authorised facilities.
- supporting resource recovery by applying the waste hierarchy and reducing contamination.
- using resources efficiently including fuel, energy, water, and materials.
- managing environmental risks through identification, assessment, and proportionate controls.
- responding to incidents effectively through prompt reporting, containment, escalation, investigation, and corrective action.
- monitoring performance and reviewing the Policy on a regular basis.

The Policy appropriately links environmental protection with waste avoidance, reuse, recycling, and organics recovery. This reflects contemporary waste management expectations and supports East Waste's role in improving diversion from landfill.

Conclusion

The Draft Protection of the Environment Policy is a practical document that is appropriately aligned with East Waste's statutory and operational responsibilities. It provides a clear statement of commitment to environmental protection, lawful waste transport, pollution prevention, resource recovery and incident management.

It is recommended that the Audit & Risk Management Committee commend the draft Protection of the Environment Policy to the East Waste Board for adoption.

EastWaste

Version No: 1.0
Issued:
Next Review:

Protection of the Environment Policy

1. Introduction

1.1. In accordance with clause 39.1.6 of the Eastern Waste Management Authority Charter, East Waste must, in consultation with its Constituent Councils, prepare, adopt and keep under review a policy on the protection of the environment.

1.2. East Waste collects and transports waste and recyclable materials on behalf of its Constituent Councils. These activities have the potential to affect the environment, and East Waste recognises its responsibility to minimise those impacts.

1.3. This policy sets out East Waste's commitment to responsible waste collection and transport, the prevention of pollution and environmental harm, resource recovery, and compliance with relevant environmental requirements. It has been prepared with consideration of the Environment Protection (Waste to Resources) Policy 2010 and the National Waste Policy 2018: Less Waste, More Resources.

2. Scope

2.1. This policy applies to all East Waste employees, contractors and labour-hire personnel. It covers East Waste's waste collection and transport services; vehicles, plant and equipment; depot, workshops and operational sites; and activities undertaken on behalf of its Constituent Councils.

3. Policy Statement

3.1. East Waste is committed to providing reliable waste collection services in a way that protects the environment and supports the recovery of valuable resources.

3.2. East Waste will conduct its activities consistently with applicable environmental requirements, including the *Environment Protection Act 1993* (SA), the *Environment Protection (Waste to Resources) Policy 2010* (SA), the *National Waste Policy 2018: Less Waste, More Resources*, and all relevant licences, approvals, codes, standards and guidelines.

4. Policy Commitments

4.1. East Waste will collect and transport waste responsibly using suitable vehicles and equipment and delivering materials only to facilities authorised to receive them. It will manage spills, leaks, litter, noise, odour, emissions and other operational risks to prevent pollution and environmental harm.

4.2. East Waste will prevent pollution and environmental harm by ensuring waste is managed safely and remains contained throughout collection and transport. Escaped waste, spills, leaks and other environmental risks will be addressed promptly and in accordance with approved procedures.

4.3. Waste will be kept contained during collection and transport. East Waste will respond promptly when waste escapes from a vehicle or collection container and will manage prohibited, hazardous and unknown materials safely and in accordance with applicable requirements and approved procedures.

4.4. East Waste will apply the waste hierarchy by supporting waste avoidance, reuse, recycling and resource recovery ahead of disposal. Waste streams will be kept separate to minimise contamination of recyclable and organic materials, improve resource recovery and reduce waste sent to landfill.

4.5. East Waste will promote the efficient and responsible use of fuel, energy, water and materials across its operations, and will consider environmental sustainability when planning services and making operational and purchasing decisions.

5. Sustainable Resource Management

5.1. East Waste will support its Constituent Councils to recover resources and reduce disposal to landfill by keeping general waste, recycling and organic material separate during collection and transport and delivering each waste stream to an appropriately authorised facility.

5.2. East Waste will identify and report contamination, support clear and consistent information about correct bin use, conduct bin audits and use collection information to identify opportunities for improvement.

6. Waste Collection and Transport

6.1. East Waste will use vehicles and equipment that are suitable for the type and volume of material being collected. Vehicles and equipment will be inspected, serviced and maintained to prevent leaks, spills and excessive emissions, and loads will be secured in accordance with applicable requirements and operational procedures.

6.2. East Waste will take reasonable steps to minimise litter and recover escaped waste where it is safe and practicable to do so. Waste will be transported only to facilities authorised to receive the relevant material.

6.3. Rejected, prohibited, hazardous and unknown materials will be managed in accordance with approved procedures. Contamination and incorrectly presented waste will be reported through East Waste's approved processes.

6.4. East Waste will maintain collection, transport and disposal records as required by law and East Waste procedures. Collection routes and schedules will be planned and reviewed to improve service efficiency, minimise unnecessary travel and reduce vehicle-related fuel consumption and emissions.

6.5. Employees and contractors must not collect or transport material that cannot be managed safely or lawfully. Such material must be reported promptly to the relevant supervisor.

7. Environmental Risk Management

7.1 East Waste will identify, assess and manage environmental risks arising from its activities. These may include spills of fuel, oil, hydraulic fluid or chemicals; leaking leachate or other liquids; escaping waste or litter; waste entering drains, waterways or environmentally sensitive areas; contamination of land, stormwater or water; excessive dust, smoke, noise, odour or vehicle emissions; fires involving collection vehicles or waste loads; and the collection or discovery of hazardous, prohibited or unknown materials.

7.2 Environmental controls will be proportionate to the nature and scale of each risk and will prioritise preventing environmental harm before it occurs.

8. Environmental Incident Management

8.1 All environmental hazards, incidents, near misses and suspected breaches must be reported promptly through Skytrust.

8.2 When an environmental incident occurs, employees and contractors must stop the activity where it is unsafe or may cause further environmental harm. They must take reasonable steps to protect people and the environment without placing themselves or others at risk, contain the incident where it is safe to do so and they are trained and equipped to respond, promptly notify the relevant supervisor, follow East Waste's incident and emergency procedures, and assist with reporting and investigation requirements.

8.3 East Waste will notify emergency services, regulators, Constituent Councils and other relevant parties where required. Environmental incidents will be investigated, and appropriate corrective actions will be implemented and monitored to prevent recurrence.

9. Accountability and Reporting

9.1. The General Manager is responsible for overseeing the implementation of this policy and ensuring that appropriate systems, procedures, training and operational controls are in place to support compliance.

9.2. Managers and supervisors are responsible for monitoring environmental performance within their areas of responsibility, ensuring that environmental incidents, hazards, near misses and suspected breaches are reported and addressed in accordance with East Waste procedures.

9.3. Employees, contractors and labour-hire personnel are responsible for complying with this policy, following relevant procedures and directions, and promptly reporting environmental risks, incidents and non-compliance through approved reporting processes.

9.4. The General Manager will provide reports to the East Waste Board, as appropriate, on significant environmental incidents, material compliance issues, trends in environmental performance, and actions taken to address identified risks and improve environmental outcomes.

10. Legislation

Environment Protection Act 1993

Environment Protection (Movement of Controlled Waste) Policy 2014

Environment Protection (Waste to Resources) Policy 2010

Green Industries SA Act 2004

Local Government Act 1999

Local Nuisance and Litter Control Act 2016.

11. Related Documents

Eastern Waste Management Authority Charter

National Waste Policy 2018: Less Waste, More Resources.

12. Monitoring and Review

12.1. East Waste will monitor implementation of this policy through incident and contamination data, operational inspections, audits, compliance reviews, resource recovery information and other relevant performance measures.

12.2. This Policy will be reviewed every four years, and following any material legislative or operational change, significant environmental incident or identified compliance issue. Reviews will be undertaken in consultation with the Constituent Councils where required by the Eastern Waste Management Authority Charter.

Signed	Signed
General Manager	Chair of East Waste Board
Date	Date

13. Document History

Version No:	Issue Date:	Description of Change:
1.0	September 2026	Draft Protection of the Environment Policy