

APPENDIX A

Submissions and comments

We have consulted with Bendigo, Frankston, Melton, Mornington and Surf Coast, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

Responses received

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30 January 2023

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31 / 35 Collins Street
MELBOURNE VIC 3000

Dear Mr Greaves

Proposed Performance Audit Report: Regulating private pool and spa safety

Thank you for the opportunity provided to the City of Greater Bendigo to participate in the VAGO Performance Audit – *Regulating private pool and spa safety*.

The City's action plan addressing recommendations from the *Regulating private pool and spa safety* audit are included as part of this correspondence.

I would like to thank the VAGO team who worked with City officers involved in the audit, allowing for a cooperative and positive approach.

Should you require any further information or wish to discuss the City's action plan further, please contact Jock Schofield, Manager Safe and Healthy Environments on 5434 6270.

Yours sincerely



Craig Niemann
Chief Executive Officer

If you are deaf, hearing or speech impaired, please call us via the National Relay Service on 133 677 or www.relayservice.com.au

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**City of Greater Bendigo – Action plan to address recommendations from
*Regulating private pool and spa safety***

VAGO recommendation	Council response	Action	Completion date
Internally report on the number of pools and spas with outstanding certificates of compliance and apply a risk-based approach to determine actions and timeframes to address them.	Accepted	COGB to determine and document required actions to be taken for outstanding certificates of compliance.	July 2023
Internally report on the number of unregistered pools and spas and determine actions and timeframes to address them	Accepted	COGB to investigate further methods to identify unregistered pools within the municipality and document an appropriate course of action for non-registration.	July 2023
Address their registration systems' limitations by: <ul style="list-style-type: none"> improving how they monitor and report on outstanding registrations and certifications reducing the need for staff to manually process registrations and reminder letters improving how they link to information in other council systems, such as building permits. 	Accepted	COGB to engage with E-VIS and Council I.T department to identify "short-comings" within the system and investigate possible improvements for monitoring outstanding registrations and manual processes.	September 2023
Develop a procedure that: <ul style="list-style-type: none"> includes a risk-based approach to address certificates of noncompliance, including timeframes and actions for different risk categories requires staff to document decisions about responding to noncompliant pools and spas 	Accepted	COGB to determine and document required actions to be taken for certificates of noncompliance, including a documented risk matrix and procedure for each matrix category. COGB to review and improve where possible current procedure for responding to non-compliant pools.	August 2023

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<ul style="list-style-type: none"> states when and how councils will remind owners to submit a certificate of compliance 		<p>COGB to review and improve where possible current procedure to remind and compel owners to provide a certificate of compliance – (note reminder letters are automatically sent to owners for 4 yearly inspection certificates after initial pool registration)</p>	
<ul style="list-style-type: none"> states when and how councils will follow up with owners of unregistered pools and spas 		<p>COGB to review current process and include documented timeframes for follow up and complete set-up of issuing infringements to owners with unregistered pools</p>	
<ul style="list-style-type: none"> includes information staff must consider when determining a pool or spa's construction date 		<p>COGB to document its own procedure for determining construction dates (currently COGB uses VBA pool and spa registration guidelines).</p>	
<ul style="list-style-type: none"> requires councils to maintain related records for all pools and spas. 		<p>COGB is currently working with E-VIS to provide a "filter-function" to the system which allows a search of historical records where pools were deemed non-compliant in the past but have transitioned to compliant.</p>	



Frankston City Council

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Enquiries: Sam Clements
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27 January 2023

Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
C/- [REDACTED]

Dear Andrew

RE: Proposed Performance Audit Report: Regulating Private Pool and Spa Safety

Thank you for your letter addressed to Mayor Nathan Conroy dated 16 January 2023 and for the opportunity to review and respond to the audit recommendations directed to Frankston City Council.

I confirm that Frankston City Council accepts all the audit recommendations directed and am pleased to advise that work on some recommendations has already commenced. Since the audit, Council has issued infringements to all unregistered pool owners, requiring registration within 30 days, and has made further progress toward essential system improvements. The attached table outlines the Council's action plan to address these recommendations in greater detail.

Council thanks the Audit team for their collaborative and consultative approach, particularly with the opportunity to meet, discuss and provide a response to each of the findings or recommendations throughout the audit process.

Please contact Mr. Sam Clements, Manager Development Services on 1300 322 322 should you have any queries or would like any further information regarding Council's action plan to better regulate private pool and spa safety.

Yours faithfully



Phil Cantillon
CHIEF EXECUTIVE OFFICER

cc: Mayor Nathan Conroy
Angela Hughes, Director Communities
Sam Clements, Manager Development Services

Seaford » Frankston » Langwarrin » Karingal » Skye » Frankston South » Frankston North » Carrum Downs » Langwarrin South » Sandhurst



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Frankston City Council – Action plan to address recommendations from *Regulating private pool and spa safety*

VAGO recommendation	Council response	Action	Completion date
Internally report on the number of pools and spas with outstanding certificates of compliance and apply a risk-based approach to determine actions and timeframes to address them.	Accepted	<p>Council already has the ability to generate a report on this at any time and reports on this quarterly through its legislative compliance system (RelianSys), which goes to the audit and risk committee. Council is applying a risk-based approach to its actions and timeframes.</p> <p>More specifically, Council has sent out reminder letters to all these property owners (with outstanding certificates), will be sending out warning letters and will then be issuing infringements. These processes will be documented in the final Building Services- Pool Register Procedure.</p>	<p>Warning letters- 28 February 2023 (allowing 30 days to lodge certificate)</p> <p>Infringements issued – 31 March 2023</p> <p>Procedure updated- 31 March 2023</p>
Internally report on the number of unregistered pools and spas and determine actions and timeframes to address them	Accepted	<p>Since the audit, Council has sent out infringements to all unregistered pools requiring registration within 30 days.</p> <p>If pools remain unregistered past the nominated 30 day deadline, Council will then manually register the pools on the owner's behalf and invoice for the applicable fees. If these newly registered pools have a certificate of barrier compliance due or overdue Council will need to consider if a different approach is taken as opposed to other overdue certificates of barrier compliance (e.g. whether we move straight to Building Enforcement action).</p> <p>Council will document its approach within the Building Services- Pool Register Procedure.</p>	<p>Registering overdue pools- 28 February 2023</p> <p>Procedure updated- 31 March 2023</p>
Address their registration systems' limitations by: a) improving how they monitor and report on	Accepted	Business Improvement project plan is being developed, with an officer dedicated to the improvement work needed to improve our registration system.	System Improvements completed - 31 August 2023

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<p>outstanding registrations and certifications</p> <p>b) reducing the need for staff to manually process registrations and reminder letters</p> <p>c) improving how they link to information in other council systems, such as building permits.</p>		<p>a) Various system (Pathway) improvements are planned to improve monitoring and reporting, including:</p> <ul style="list-style-type: none"> - Report that identifies outstanding fees - Reports on outstanding certificates and those nearing the due date - Report on outstanding barrier improvement notices <p>b) An automated process is unfortunately not possible. Each registration must be done manually. However, there is a possibility to automate reminder letters on all current registrations, similar to health business registration reminders and renewals.</p> <p>c) The current process already links the licensing module to the application (building permits) module. We cannot link to historic files, but we do include the historic building permit card reference in the pool licence/registration.</p> <p>In addition to the report and renewal improvements above, the business project scope includes improvements to the licensing workflows, and the infringements and enforcement modules of the Pathway system.</p>	<p>Procedure updated- 31 March 2023</p>
<p>Develop a procedure that:</p> <p>a) includes a risk-based approach to address certificates of noncompliance, including timeframes and actions for different risk categories</p> <p>b) requires staff to document decisions about responding to noncompliant pools and spas</p>	Accepted	<p>As identified in the audit report, Frankston City Council already has a Draft Building Services- Pool Register Procedure which documents most of these matters, but we accept this procedure can be further strengthened. This procedure will be updated and moved from draft to final format.</p> <p>A) A risk assessment is now undertaken as per the procedure. All immediate risk 'non-compliance' is addressed via the Senior Building Enforcement Officer and treated differently. A Building Enforcement file is created and an inspection by a Council Building Officer is undertaken as soon as possible. Expected timeframes and actions to address certain risk types will be detailed in the Procedure.</p> <p>B) The procedure already requires Building Officers to keep file notes of decisions made in respect to noncompliant pools.</p>	

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<p>c) states when and how councils will remind owners to submit a certificate of compliance</p> <p>d) states when and how councils will follow up with owners of unregistered pools and spas</p> <p>e) includes information staff must consider when determining a pool or spa's construction date</p> <p>f) requires councils to maintain related records for all pools and spas.</p>		<p>C) Council will document the 'reminder' process in the Building Services- Pool Register Procedure. Generally, the process is- reminder letter, then warning letter providing 30 days and then infringement/s issued.</p> <p>D) Since the audit, Council has sent out infringements to all unregistered pools requiring registration within 30 days. If pools remain unregistered past the deadline Council will manually register the pools on the owners behalf and invoice the applicable fees. If these newly registered pools have a certificate of barrier compliance due or overdue Council will need to consider if a different approach is taken as opposed to other overdue certificates of barrier compliance (e.g. whether these go straight to Building Enforcement). Council will document this process within its finalised Building Services- Pool Register Procedure.</p> <p>E) How to determine a pool or spa's construction date is already documented in the procedure.</p> <p>F) Record keeping requirements are in the procedure- file note and recording keeping requirements.</p>	
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27 January 2023

Mr Andrew Greaves
Auditor – General
Victorian Auditor – General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

Dear Mr Greaves

Re: Performance audit - Regulating private pool and spa safety

Melton City Council thanks the Victorian Auditor-General's Office (VAGO) for providing the Proposed Performance Audit Report - *Regulating private pool and spa safety* and for offering Council the opportunity to provide comment to be included in the report.

The learning and recommendations of the audit will ensure that Council is able to deliver a best practice private pool and spa safety program to meet the objectives of the Regulations. I am pleased to submit Melton City Council's action plan to address recommendations from the *Regulating private pool and spa safety audit*, as attached.

I wish to thank the Audit team for their collaborative and constructive approach and for the opportunity to provide comment on the performance audit.

Yours sincerely


Roslyn Wai
Chief Executive Officer

A thriving community
where everyone belongs

Civic Centre
232 High Street
Melton VIC 3337

**Melton Library
and Learning Hub**
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Melton VIC 3337

**Caroline Springs Library
and Learning Hub**
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**Melton City Council – Action plan to address recommendations from
*Regulating private pool and spa safety***

VAGO recommendation	Council response	Action	Completion date
Internally report on the number of pools and spas with outstanding certificates of compliance and apply a risk-based approach to determine actions and timeframes to address them.	Accepted	Council has commenced developing an automated report which provides a list of pool and spa with non-compliant certificates. Council will modify its draft procedure to ensure it references the Building Control Intervention Policy and timeframes for enforcement action.	1 June 2023 1 March 2023
Internally report on the number of unregistered pools and spas and determine actions and timeframes to address them	Accepted	Council has engaged additional staff to cross reference compliance dates. As of the 9 January 2023, all pools and spas with a due date prior to 1 June 2023 have been cross referenced with Council records to ensure compliance dates are correct. Cross referencing of the remaining pools and spas due for the 1 June 2024 has commenced and will be completed by 1 January 2024.	1 January 2024
Address their registration systems' limitations by: <ul style="list-style-type: none"> improving how they monitor and report on outstanding registrations and certifications reducing the need for staff to manually process registrations and reminder letters improving how they link to information in other council systems, such as building permits. 	Accepted	Council has commenced developing an automated report which provides a list of pool and spa with non-compliant certificates. These reports will be reviewed by Department Manager to ensure outstanding registrations and certificates are actioned. Council will engage with current software	1 July 2023

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		provider to improve cross referencing with other systems to establish one source of truth for building permit data.	
<p>Develop a procedure that:</p> <ul style="list-style-type: none"> includes a risk-based approach to address certificates of noncompliance, including timeframes and actions for different risk categories requires staff to document decisions about responding to noncompliant pools and spas states when and how councils will remind owners to submit a certificate of compliance states when and how councils will follow up with owners of unregistered pools and spas includes information staff must consider when determining a pool or spa's construction date requires councils to maintain related records for all pools and spas. 	Accepted	<p>Council will modify its draft procedure to ensure it references the Building Control Intervention Policy and timeframes for enforcement action.</p> <p>All certificates for 2022 have been assessed by staff. Enforcement action will commence for any resident that has not submitted a certificate.</p>	<p>1 March 2023</p> <p>1 February 2023</p>

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Ref: Direct contact David Simon (03) 5950 1641
Your Ref: 3475723



7 February 2023

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office

Sent via email: [REDACTED]
Cc: [REDACTED]
Cc: [REDACTED]
Cc: [REDACTED]

Dear Sir,

PROPOSED PERFORMANCE AUDIT REPORT: REGULATING PRIVATE POOL AND SPA SAFETY

I refer to your letter dated 16 January 2023 regarding the Regulating private pool and spa safety audit report. Mornington Peninsula Shire Council (MPSC) welcomes the audit and thanks the Victorian Auditor-General's Officer (VAGO) for consulting with MPSC throughout the process and providing the opportunity to address the initial findings.

MPSC notes the four recommendations made to it with respect to an Action Plan. MPSC confirms that it either fully or partially accepts all recommendations and has included deadlines for investigating and implementing all of those, noting that MPSC is moving towards implementation of a new IT system, which may provide for additional automation or functionality they may not currently exist. I have attached the proposed Action Plan as requested.

MPSC acknowledges that the VAGO's staff will follow up periodically regarding progress against these recommendations and will have the matter listed as part of its internal Audit and Risk Committee matters.

MPSC acknowledges the importance of regulating private pool and spa safety to the community's safety and is committed to implementing the industry best practice standards for monitoring and enforcement of pool and spa safety.

Should you wish to discuss the matter please contact David Simon – Manager Development Services on 0481 097 261.

Yours faithfully

[REDACTED]

John Baker
Chief Executive Officer

Attachment

Contact the Mornington Peninsula Shire

☎ 1300 850 600
🌐 mornpen.vic.gov.au
✉ customerservice@mornpen.vic.gov.au

By post: Private Bag 1000,
90 Besgrove Street, Rosebud VIC 3939
ABN: 53 159 890 143



**Mornington Peninsula Shire Council – Action plan to address recommendations from
*Regulating private pool and spa safety***

VAGO recommendation	Council response	Action	Completion date
Internally report on the number of pools and spas with outstanding certificates of compliance and apply a risk-based approach to determine actions and timeframes to address them.	Accepted	Mornington Council will as a priority process map a new procedure that regularly alerts the staff to any outstanding compliance properties and have these properties undergo a risk assessment to determine the appropriate action for each case along with the implementation of timeframes against each action.	31 July 2023
Internally report on the number of unregistered pools and spas and determine actions and timeframes to address them	Accepted	Mornington Council will introduce a monthly report in addition to the existing swimming pool register that focuses on the unregistered pools and spas. New action process mapping to be created alongside introducing the infringement/enforcement process and appropriate time frames to be implemented against these action steps. Tech 1 will require new events to ensure the process is consistent and easily tracked when reporting on the status of each affected property address.	31 August 2023

Contact the Mornington Peninsula Shire

☎ 1300 850 600
 🌐 mornpen.vic.gov.au
 📧 customerservice@mornpen.vic.gov.au

By post: Private Bag 1000,
 90 Besgrove Street, Rosebud VIC 3939
 ABN: 53 159 890 143



<p>Address their registration systems' limitations by:</p> <ul style="list-style-type: none"> • improving how they monitor and report on outstanding registrations and certifications • reducing the need for staff to manually process registrations and reminder letters • improving how they link to information in other council systems, such as building permits. 	<p>Partially Accepted</p>	<p>System review to be undertaken across all current systems utilised for the swimming pool process to eliminate the manual processing and double handling of staff responsibilities and to create more online and automated processes.</p> <p>The linking of building permits against the requirements of the swimming pool regulations to any one property address are already in place by automatically populating the swimming pool application wizard in Tech 1 when a Building Permit is entered that includes within the building permit works, a swimming pool and or spa.</p>	<p>31 December 2023</p>
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Contact the Mornington Peninsula Shire

1300 850 600
mornpen.vic.gov.au
customerservice@mornpen.vic.gov.au

By post: Private Bag 1000,
 90 Besgrove Street, Rosebud VIC 3939
 ABN: 53 159 890 143



<p>Develop a procedure that:</p> <ul style="list-style-type: none"> includes a risk-based approach to address certificates of noncompliance, including timeframes and actions for different risk categories requires staff to document decisions about responding to noncompliant pools and spas states when and how councils will remind owners to submit a certificate of compliance states when and how councils will follow up with owners of unregistered pools and spas includes information staff must consider when determining a pool or spa's construction date requires councils to maintain related records for all pools and spas. 	<p>Accepted</p>	<p>Mornington Council acknowledge all matters raised and are confident that during the overall process improvement that all items will be addressed and implemented.</p>	<p>31 August 2023</p>
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Contact the Mornington Peninsula Shire

1300 850 600
mornpen.vic.gov.au
customerservice@mornpen.vic.gov.au

By post: Private Bag 1000,
 90 Besgrove Street, Rosebud VIC 3939
 ABN: 53 159 890 143



Our Ref: D23/21077
Your Ref: 34757 23
Contact: Fiona Whitehand Ph 52610590

6 February 2023

Mr Andrew Greaves
Auditor – General
Victorian Auditor General's Office
Level 31 – 35 Collins Street,
Melbourne 3000

Dear Andrew

Response Proposed Performance Audit Report: Regulating private pool and spa safety

Surf Coast Shire Council thanks the Victorian Auditor General's Office (VAGO) for providing the Proposed Audit Report regulating private pool and spa safety.

The report and proposed recommendations will ensure that private pools and spas are registered along with a framework for reporting, monitoring registrations and identifying and responding to non-compliance.

Surf Coast Shire Council has considered the report and recommendations within current resourcing given Council's financial constraints. I am pleased to provide a response for the Proposed Performance Audit Report and recommendations as attached.

Council thanks the Audit Team for their collaborative and consultative approach to the audit and for the opportunity to provide a response to the report and recommendations.

Yours faithfully



Robyn Seymour
Chief Executive Officer

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**Surf Coast Shire Council – Action plan to address recommendations from
*Regulating private pool and spa safety***

VAGO recommendation	Council response	Action	Completion date
Internally report on the number of pools and spas with outstanding certificates of compliance and apply a risk-based approach to determine actions and timeframes to address them.	<p>Accepted</p> <p>Surf Coast Shire will create and implement reporting regime for outstanding pools and spas.</p> <p>A risk matrix can be developed and implemented assessing the level of risk of outstanding certificates of compliance.</p> <p>Processes to action non-compliance can be developed, however, the quantity of outstanding compliance certificates is unknown at this point in time due to Council programs unable to integrate, therefore requiring manual processing.</p> <p>Currently, Surf Coast Shire is not confident that staffing resources are available to implement this program and manage the Pool Registration Process.</p> <p>Surf Coast Shire will continue to develop and implement new IT systems and processes aimed at improving processes and timeframes.</p>	<p>Surf Coast Shire Council will continue developing reporting systems to internally report on the number of pools and spas with outstanding certificates by the 30 June 2023.</p> <p>Surf Coast shire Council will develop and implement a risk rating matrix and apply it to outstanding certificates of non-compliance by 30 June 2023.</p> <p>Surf Coast Shire will confirm the extent of non – compliance and assess the level or risk and resource to address this. Once this is known Council can establish response timeframes.</p>	30 June 2023

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Internally report on the number of unregistered pools and spas and determine actions and timeframes to address them	<p>Accepted</p> <p>Surf Coast Shire is using a government funded position to work on unregistered pools/investigation list. This has only been for the last 4-6 weeks (one day a week). At this stage we are unable to determine exact number of unregistered pools/spas until list is completed and the existence of pools/spas confirmed.</p> <p>The above mentioned position is not a sole resource for this purpose and the funding for the position has a short timeframe. This will not be an ongoing position.</p>	<p>Surf Coast Shire</p> <p>Council will continue to develop reporting systems to internally report on the number of pools and spas with outstanding certificates by the end of 30 June 2023.</p> <p>Surf Coast shire Council will develop and implement a risk rating matrix and apply it to outstanding certificates of non-compliance by end 30 June 2023.</p> <p>Surf Coast Shire will confirm the extent un-registered pools/spas and assess the level or risk and respond according to the risk matrix time frame.</p>	30 June 2023
<p>Address their registration systems' limitations by:</p> <ul style="list-style-type: none"> improving how they monitor and report on outstanding registrations and certifications reducing the need for staff to manually process registrations and reminder letters improving how they link to information in other council systems, such as building permits. 	<p>Partial Accepted</p> <p>Surf Coast Shire is committed to improving and enhancing the monitoring of outstanding registrations and certifications. Designing and implementing systems will include setting time frames to assess reports and levels of non-compliance.</p>	<p>Surf Coast shire will continue to enhance and develop monitoring systems to monitor and review outstanding registrations and certificates.</p> <p>Council will undertake an assessment of current IT</p>	30 June 2023

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	<p>The IT advice received indicates there is no capacity for the current system to send letters /reminders due to system limitations and the capabilities of the current system are unable to be enhanced.</p> <p>Further upgrades are not budgeted for at this point in time and would be costly requiring a total system overhaul.</p> <p>Manual handling will still be required until such time as a new IT system can be implemented or alternatively, exploring other existing platform to reduce manual handling.</p> <p>Surf Coast Shire can confirm that building permits links have been created and are now linked to Council's Pool Register.</p>	<p>platforms to establish if they have capability to reduced manual processes.</p> <p>Councils' Digital Transformation team is assessing the current systems for potential upgrading or replacing.</p>	
<p>Develop a procedure that:</p> <ul style="list-style-type: none"> includes a risk-based approach to address certificates of noncompliance, including timeframes and actions for different risk categories requires staff to document decisions about responding to noncompliant pools and spas states when and how councils will remind owners to submit a certificate of compliance states when and how councils will follow up with owners of unregistered pools and spas 	<p>Accepted</p> <p>Surf Coast Shire will continue to develop a procedure that responds to the listed six points.</p> <p>Council wishes to advise that the extent of non-compliance as mentioned in this response is not known however, each identified</p>	<p>Surf Coast Shire will develop and implement procedures to address the recommendations.</p>	30 June 2023

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<ul style="list-style-type: none">• includes information staff must consider when determining a pool or spa’s construction date• requires councils to maintain related records for all pools and spas.	noncompliance will be assessed against the risk matrix and responded to according to set time frames.		
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