

Western Australian Auditor General's Report



Regulation of Asbestos Removal



Report 22: 2019-20

21 May 2020

**Office of the Auditor General
Western Australia**

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The Office of the Auditor General acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures, and to Elders both past and present.

WESTERN AUSTRALIAN AUDITOR GENERAL'S REPORT

Regulation of Asbestos Removal



**THE PRESIDENT
LEGISLATIVE COUNCIL**

**THE SPEAKER
LEGISLATIVE ASSEMBLY**

REGULATION OF ASBESTOS REMOVAL

This report has been prepared for submission to Parliament under the provisions of section 25 of the *Auditor General Act 2006*.

This was an independent performance audit. Performance audits are an integral part of my Office's overall program of audit and assurance for Parliament. They seek to provide Parliament and the people of WA with assessments of the effectiveness and efficiency of public sector programs and activities, and identify opportunities for improved performance.

The audit assessed if WorkSafe effectively regulates the asbestos removal industry. It follows my Office's 2007 report on *Management of Asbestos-Related Risks by Government Agencies* and 2015 report on *Asbestos Management in Public Sector Agencies*.

I wish to acknowledge the entity's staff for their cooperation with this audit.

A handwritten signature in black ink, appearing to read 'C Spencer'.

CAROLINE SPENCER
AUDITOR GENERAL
21 May 2020

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Auditor General's overview

Asbestos is a hazardous material which if inhaled, can cause serious health problems like asbestosis and lung cancer, including mesothelioma. Although a national ban on the use of asbestos came into effect in 2003, it can still be found in, and around, older residential and workplace buildings.



This audit assessed if WorkSafe effectively regulates the asbestos removal industry in Western Australia. It follows my Office's 2007 report on *Management of Asbestos-Related Risks by Government Agencies* and the 2015 report on *Asbestos Management in Public Sector Agencies*.

Australia is ahead of some international jurisdictions in managing asbestos risk. However, due to the seriousness of the risks, and the fact that many workers may not be aware of the very hazardous materials they are exposed to, community expectations around government regulation and employer responsibility are high. Although asbestos is a challenging area to regulate, we expected WorkSafe to have established good practices for regulating asbestos removal. This was not what we found as there are several areas where WorkSafe needs to improve its practices.

Asbestos is prevalent throughout the State and WorkSafe relies on timely notification from industry to observe safe removal practices. While there is a reasonable amount of regulatory activity and contact by WorkSafe with the asbestos removal industry, practices are inconsistent and not well documented. For example, although regulatory contact through audits of licensees is frequent – approximately once every 3 years – these audits are only records-based at the licensees' offices and do not involve inspections of worksites where asbestos is removed. The worksite inspection regime for asbestos removal is infrequent and assessment documentation does not clearly indicate how higher risk operators and removal activities are targeted. It is important that monitoring and compliance activities provide assurance of safe practices at the point of potential harm to workers and the community from this dangerous substance.

Respirable crystalline silica is also an issue that has attracted national media attention recently because of the occupational health hazards that it poses just like asbestos. Silicosis, however, can have a shorter period between exposure and diagnosis, and usually proves fatal. As part of this audit, we looked briefly at what WorkSafe is doing to address this rapidly emerging issue for some manufacturing industries. We found that WorkSafe has started addressing this issue by raising awareness in a campaign targeting benchtop fabrication businesses and is conducting investigations into respirable crystalline silica exposure at workplaces. Although manufacturing businesses using products that contain crystalline silica are not licensed like asbestos removalists, many of our recommendations could be applied to those other businesses to reduce health risk to workers and the community.

I am pleased that the new WorkSafe Commissioner has accepted my Office's findings and has committed to building organisational and staff capability in the regulation of asbestos removal to better manage worker health measures and other worksite risks. WorkSafe has a renewed focus and is currently undergoing significant change in how it regulates asbestos removal.

Many other State and local government entities license or register businesses across a range of industries. I hope those entities will also consider how the recommendations in this report can be applied to their own diverse regulatory regimes.

Executive summary

Introduction

This report follows our 2007 report on *Management of Asbestos-Related Risks by Government Agencies* and 2015 report on *Asbestos Management in Public Sector Agencies*. We assessed if WorkSafe effectively regulates asbestos removal by issuing and renewing licences appropriately, and performing risk-based monitoring to reduce the risk of asbestos exposure.

Our specific criteria were:

- Does WorkSafe have adequate controls over the issue of licences for asbestos removal?
- Does WorkSafe have an effective monitoring and compliance program?

We considered WorkSafe's policies and practices relevant to licensing of asbestos removalists in light of good regulatory practice principles. We also drew on the provisions in the *Occupational Safety and Health (OSH) Act 1984* and the OSH Regulations 1996 that relate specifically to asbestos management and the *Code of Practice for the Safe Removal of Asbestos*¹ (the Code).

Conclusion

There are significant gaps in WorkSafe's processes and practices which limit how effectively it regulates asbestos removal licensing in Western Australia. Regulatory actions are not risk-based, documentation is weak, and there is a lack of rigour and transparency in licensing approval controls. Despite these weaknesses, no instances came to our attention during the audit where licences were issued inappropriately.

While WorkSafe performs regular records-based audits of licensees at their offices and undertakes worksite inspections and investigations of some licensees, there are significant deficiencies in WorkSafe's overall monitoring and compliance activities. In particular, audits are not comprehensive, not consistently undertaken or documented and do not routinely or regularly include inspections of worksites when asbestos material is removed.

WorkSafe does inspect worksites when it receives notifications about friable asbestos removal work. During the audit period these inspections were done for a quarter of the notifications it received. However, WorkSafe could not demonstrate that its inspection resources are targeted at the highest risk employers or worksites. WorkSafe is also missing important opportunities to use asbestos-related data from the community and other government entities, including a large volume of complaints received, to better target its compliance and awareness raising activities.

Background

Asbestos

Asbestos is a well-known occupational carcinogen. Australian governments began banning asbestos in the 1980s due to concerns about asbestos-related deaths and diseases. A national ban on its use came into effect on 31 December 2003. The ban extends to the

¹ [Code of practice for the safe removal of asbestos 2nd Edition](#). Australian Government, National Occupational Health and Safety Commission. Canberra, April 2005.

import and export of all products containing asbestos. There are 2 types of asbestos-containing materials:

- Friable asbestos material can be easily crumbled or reduced to powder. This type of asbestos is more likely to become airborne and, therefore, has inherently more health risks.
- Non-friable asbestos products contain asbestos fibres that have been mixed with materials, such as cement, and are commonly found in buildings in Australia. If disturbed, damaged or broken non-friable asbestos may release asbestos fibres into the air, and cause health risks.

Asbestos removal is a difficult area to regulate. Asbestos is highly prevalent throughout the State and observing safe removal practices relies on timely notifications from industry. WorkSafe, which is a division of the Department of Mines, Industry Regulation and Safety (DMIRS), is currently undergoing significant change in how it regulates asbestos removal.

Asbestos removal licences

A licence is required in Western Australia (WA) for the removal of any amount of friable asbestos or for the removal of more than 10 square metres of non-friable asbestos materials.

WorkSafe issues 2 types of asbestos removal licences:

- Unrestricted – allows the licence holder, or their employees, to remove both forms of asbestos.
- Restricted – allows the licence holder, or their employees, to remove non-friable asbestos.

Both types of licence are valid for 3 years and are issued with standard conditions about the way asbestos removal work must be carried out. As at 1 October 2019, there were 23 unrestricted licence and 969 restricted licence holders in WA.

Respirable crystalline silica

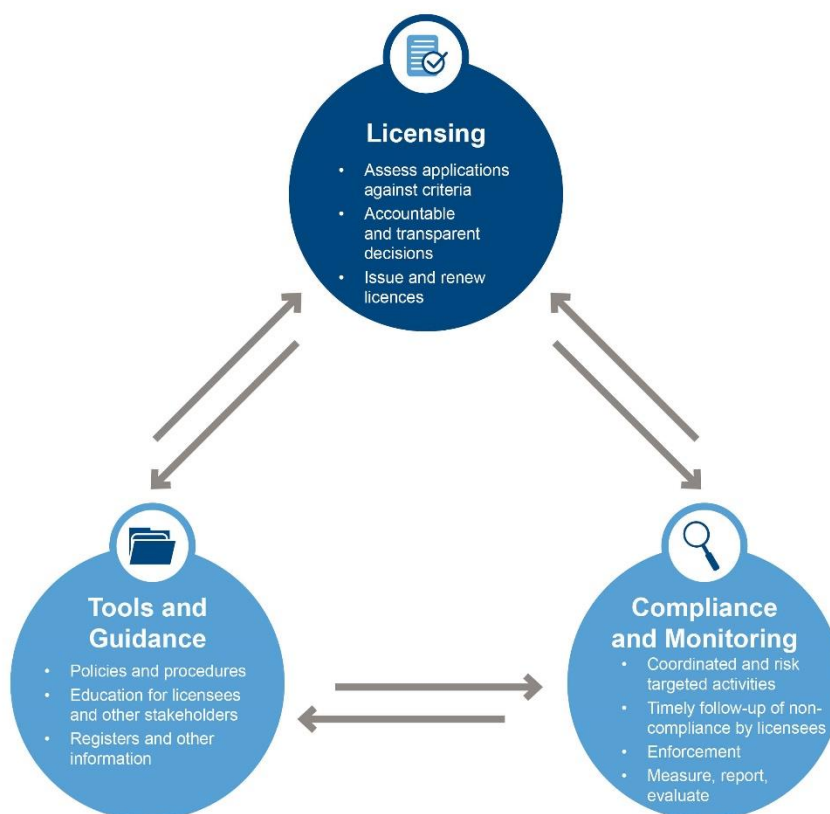
Crystalline silica is found in sand, stone, concrete and mortar. It is used to make various products including kitchen and bathroom benchtops, bricks, tiles and some plastics. Respirable crystalline silica (RCS) is produced when workers cut, crush, drill, polish or grind products that contain crystalline silica and the small dust particles created can lodge deep into the lungs. This issue has received recent media coverage across Australia as posing a significant health risk similar to asbestos.

As part of this audit we had a high-level look at what WorkSafe is doing to address the emerging occupational health hazards linked to workers being exposed to RCS. In 2018-19, WorkSafe initiated a proactive health and safety campaign to provide the industry with examples of good practice for working with RCS. This included:

- publishing information on its website such as safety alerts, a guidance note for safe stone product fabrication and installation, and a checklist for cutting stone benchtops
- conducting 32 inspections into RCS exposure in benchtop fabrication in the first year, which resulted in 23 verbal directions, 268 improvement notices and 2 prohibition notices being issued. This work has continued in 2019-20.

Although businesses working with RCS are not regulated in the same way that asbestos removalists are, WorkSafe has an opportunity to apply recommendations we have made in this audit to other industries and ensure its resources are used most efficiently to protect workers.

Figure 1 shows the key elements of good regulatory practices that we considered during this audit.



Source: OAG using information from the Australian National Audit Office Better Practice Guide – Administering Regulation

Figure 1: Key elements of good regulatory practice

Recommendations

To strengthen its regulation of asbestos removal, the WorkSafe Commissioner, through the Department of Mines, Industry Regulation and Safety (DMIRS) should:

1. Develop processes which allow for on-site inspections of worksites where asbestos is removed by restricted licence holders.

WorkSafe response: Agree

Implementation timeframe: by July 2021

2. Update its documented guidance for:

a. assessing licence applications and provide staff with structured training to use it

b. auditing licence holders to ensure audits are comprehensive.

WorkSafe response: Agree

Implementation timeframe: by July 2020 (recommendation 2a) and December 2020 (recommendation 2b)

3. Improve its recordkeeping practices to:

a. ensure licensing decisions are well documented for transparency and consistency

b. include specific procedures in a DMIRS recordkeeping plan for asbestos removal licensing records

c. clearly document the results of on-site inspections of unrestricted licensees, including the initial off-site assessment by DMIRS that determines whether an inspection is required.

WorkSafe response: Agree

Implementation timeframe: by July 2020 (3a) and December 2020 (3c). Recommendation 3b has been completed.

4. Ensure its program to audit asbestos removal licence holders, and decisions regarding inspections, are targeted to the greatest risk of non-compliance, or harm to workers or the public, to maximise the effectiveness of regulatory resources.

WorkSafe response: Agree

Implementation timeframe: by December 2020

5. Perform an internal audit or review of its complaints management processes.

WorkSafe response: Agree, in relation to asbestos licensing

Implementation timeframe: by July 2021

6. Ensure conflicts of interest are managed appropriately by:

a. allowing managerial staff access to the conflicts of interest register

b. transferring conflicts of interest declared by employees of the former Department of Commerce into the current DMIRS register.

WorkSafe response: Agree, in relation to asbestos licensing

Implementation timeframe: by December 2020 (recommendation 6b). Recommendation 6a has been completed.

7. Improve the collection and management of data to:

- a. analyse its complaints data to inform its monitoring and compliance activities**
- b. use information from the public and other government entities, including waste disposal facilities, to inform its proactive programs and identify potential non-compliance issues**
- c. better report to the WorkSafe Commissioner and/or the Director General of DMIRS on the results of on-site inspections, audits, and potential issues and trends identified from complaints and investigation information so they can take action.**

WorkSafe response: Agree

Implementation timeframe: by December 2020

The full response of Department of Mines, Industry Regulation and Safety and the WorkSafe Western Australia Commissioner to our recommendations is at Appendix 2.

Response from the Department of Mines, Industry Regulation and Safety and the WorkSafe Western Australia Commissioner

The Department of Mines, Industry Regulation and Safety (DMIRS) through its Safety Regulation Group WorkSafe Directorates, conducts significant proactive and reactive work in relation to asbestos removal. In addition, resources for the licensing functions and contact centre (which receives complaints about workplace asbestos) are within the DMIRS Service Delivery Group.

The WorkSafe Western Australia Commissioner (Commissioner) is an independent statutory office holder with a range of statutory functions prescribed in the *Occupational Safety and Health Act 1984* (OSH Act). The Commissioner and DMIRS work collaboratively to ensure the functions of the Commissioner and administration of the OSH Act by DMIRS are effective.

The DMIRS Safety Regulation Group and Service Delivery Group administers the asbestos licensing regime and regulation of asbestos removal as prescribed in the OSH Act and OSH Regulations 1996 on behalf of the Commissioner. Consistent with the Office of Auditor General Regulation of Asbestos Removal report (OAG report) these entities will be referred to as 'WorkSafe'.

WorkSafe is committed to ensuring asbestos management and licensing is effectively regulated. Examples of recent changes to address the regulation of asbestos generally and in response to the issues identified through the Office of Auditor General audit are listed below.

Licensing

- In May 2019 a number of procedures were implemented for licensing staff to use and understand the inter-relationships between different asbestos licence processes. These procedural flowcharts are additional to checklists and matrices that were developed to ensure consistent procedures in the processing of licences. A copy of these were provided to the auditors during the audit.
- In August 2019 licensing Job Description Forms were updated as part of continuous improvement across the Licensing Directorate. However, staff have always had Job Description Forms.
- In September 2019, licensing practices were amended to ensure renewal applications received for a restricted licence were properly documented and archived.
- The register of unrestricted licensees was updated and uploads occur to the DMIRS website monthly. The register lists each licensee and includes a date of expiry for each licensee. This protects the public by ensuring that any member of the public viewing the register can identify whether a particular unrestricted licensee's licence has expired.

WorkSafe

- In February 2019, responsibility for the WorkSafe Inspectorates activities in relation to asbestos risks in workplaces was transferred from the Construction Team to the

Occupational Health, Hygiene and Noise Team. As part of this transfer, a specialist inspector with relevant expertise, qualifications and experience in asbestos safety was engaged to undertake *Occupational Safety and Health Act 1984* and related regulations compliance activities with a particular focus on work involving the safe removal of friable and non-friable asbestos.

- In July 2019, the asbestos licence audit functions aimed at checking asbestos removal licensees' compliance with licence conditions, was moved from the Policy Branch to the WorkSafe Inspectorate. Staff conducting the audits have received training to provide them with the skills and expertise to incorporate some inspections into the auditing role.
- In August 2019, the Premier announced the Government's approval for 21 new and additional WorkSafe inspectors to be engaged. Two of these positions have been allocated to asbestos compliance activities. One of these positions was filled in December 2019 and recruitment is well progressed for the second position.
- The WorkSafe Inspectorate has undertaken a review of some of its processes and introduced:
 - triaging of asbestos work by the Principal Scientific Officer, Occupational Health, Hygiene and Noise Team, who has the qualifications, expertise and experience to appropriately assess the risks associated with complaints and notifications received;
 - streamlined processes to enable asbestos complaints, Requests to Attend (RTA) and prescribed notifications to be actioned more quickly; and
 - a greater degree of liaison with local government authorities in relation to asbestos safety issues.

DMIRS and the Commissioner recognise the importance of the regulator role to ensure hazards such as asbestos are properly managed to protect workers and the public.

The Office of Auditor General audit and report is welcomed and has facilitated opportunity to test and improve the systems and processes implemented for asbestos management. While the audit report did not identify instances of licences being issued inappropriately the opportunities for improvement are recognised.

Audit focus and scope

This audit assessed if WorkSafe effectively regulates asbestos removal by issuing and renewing licences appropriately, and performing risk-based monitoring to reduce the risk of asbestos exposure.

Our specific criteria were:

- Does WorkSafe have adequate controls over the issue of licences for asbestos removal?
- Does WorkSafe have an effective monitoring and compliance program?

We focused on WorkSafe as the key entity responsible for regulating asbestos removal licensing under the OSH Act 1984. We also considered:

- the requirements of the OSH Regulations 1996 that relate specifically to asbestos management
- Code of Practice for the Safe Removal of Asbestos² (the Code)
- what WorkSafe is doing to address the risks of silicosis.

We assessed and analysed information and data available from 1 July 2014 to 30 June 2019.

During the audit we:

- reviewed relevant policies and procedures
- interviewed WorkSafe staff and observed staff processing licence applications
- sample tested records of restricted and unrestricted licence applications to assess compliance with legislation, the Code, WorkSafe guidance, and good regulatory practice
- sample tested records of licensee audits to assess compliance with WorkSafe guidance
- sample tested records of on-site inspections following notifications received by WorkSafe about friable asbestos removal jobs
- analysed data from 1,432 asbestos-related complaints made to WorkSafe.

The audit assessed how WorkSafe processes licence applications, both new and renewal, for restricted and unrestricted licences. We also looked at compliance and monitoring activities for all licensees.

We did not consider disposal and illegal dumping of asbestos, asbestos management by local government entities, nor management of asbestos in remote communities as part of this audit.

This was an independent performance audit, conducted under section 18 of the *Auditor General Act 2006* and in accordance with Australian Standard on Assurance Engagements ASAE 3500 *Performance Engagements*. We complied with the independence and other relevant ethical requirements related to assurance engagements. Performance audits primarily focus on the effective management of public sector programs and activities. The approximate cost of undertaking the audit and reporting was \$317,000.

² [Code of practice for the safe removal of asbestos 2nd Edition](#). Australian Government, National Occupational Health and Safety Commission. Canberra, April 2005.

Audit findings

Licences are approved without adequate controls

We found deficiencies in the controls used in the asbestos licensing approval process. This increases the risk that licensing assessments and decisions are not consistent nor robust.

Limited staff guidance and training does not support sound assessment decisions

We found that WorkSafe has not developed guidance for staff to follow when making licensing decisions nor do they receive structured training. Weaknesses in WorkSafe's assessment processes could lead to licences being granted to applicants without the required skills and experience to effectively implement safe work practices (Table 1 shows the numbers of licences issued over recent years). Despite this, we did not find any licences that had been issued inappropriately. Good licensing controls, including documented policies and procedures and staff training, would help to ensure sound licensing decisions.

Guidance and structured training are key measures to promote consistent decision making about and transparency over the 200-400 licences granted each year (Table 1).

Licence type	Granted	15/16	16/17	17/18	18/19
Restricted	new	194	166	123	70
	renewed	147	306	166	162
Total number of restricted		1,171	1,154	1,097	991
Unrestricted	new	0	1	2	1
	renewed	1	9	4	4
Total number of unrestricted		19	20	20	22
Total of both restricted and unrestricted		1,190	1,174	1,117	1,013

Source: OAG

Table 1: Restricted and unrestricted asbestos removal licences granted between 1 July 2015 and 30 June 2019

Procedure documents for asbestos licensing were incomplete, out-of-date, and did not contain guidance about what WorkSafe considers sufficient work experience for applicants to meet key competencies. The lack of well-developed and comprehensive guidance meant staff relied heavily on their professional judgement when assessing applicants' experience. A checklist and matrix are used to guide WorkSafe staff to determine whether all the required information is received before the application is approved. There are also procedural flowcharts which outline the licensing process workflow. However, the absence of clear assessment standards makes it harder to prove that licensing decisions are sound, consistent and defensible.

Guidance for withdrawn, lapsed and refused applications was limited and lacked sufficient detail to be useful for staff. During our audit, WorkSafe provided licensing staff with an email clarifying its guidance. This email outlined the differences between when an application could be withdrawn, be allowed to lapse, or when a refusal is required, and outlined processes underpinning each scenario. It is important for WorkSafe to formalise this guidance in the future to ensure reliable, consistent and defensible decisions about withdrawn, lapsed and refused applications.

Staff training about their roles and responsibilities is inadequate as WorkSafe relies on unstructured on-the-job training by more experienced staff. The importance of training is increased due to staff not having clear guidance to reference when processing and assessing applications. A lack of appropriate staff training increases the risk of incorrect and inconsistent licensing decisions.










Documentation to support licensing decisions is insufficient

WorkSafe did not retain sufficient information about its licensing decisions, as outlined in the better practice principles and provisions of the *State Records Act 2000*. We found that applicants were not required to provide important information to support their applications and decisions were not consistently recorded. We reviewed 49 applications submitted for new and renewed licences between 1 July 2014 and 30 June 2019. We found:

- the asbestos removal licence renewal application forms did not request information of applicants' systems of work to safely remove asbestos. This was based on WorkSafe's determination that the information was not required
- licensing staff did not verify applicants' training nor identification documents. Instead, uncertified photocopies were supplied with applications and accepted by staff
- handwritten notes on some application forms and licensing checklists gave some insight into the assessment process. However, the notes were not consistently made with sufficient detail to be able to follow the logic of how the statement of experience and other important information in the application was assessed, documented and validated.

Putting sufficient controls in place to ensure decisions are based on complete and verified information would help to ensure the licensing process is consistent with good regulatory practice.

Figure 2 summarises our findings of WorkSafe's licensing processes.

Licensing processes	OAG findings
 Check application form is complete	✓
 Check evidence of appropriate training from accredited organisations	✓
 Check photo identification	✓
 Information verified	✗
 Statement of experience adequately documented	✗
 Referees checked	✓
 Check of audit status and search of WorkSafe system for non-compliance	✓
 Appropriate licence conditions signed by applicant	✓
 Application approved by appropriate licensing staff	✓

Source: OAG using information provided by WorkSafe

Figure 2: OAG findings of the asbestos removal licensing processes

Record-keeping requires improvement and public information was out-of-date and potentially misleading

WorkSafe's recordkeeping practices regarding its asbestos licensing decisions are inadequate. It relies on the DMIRS recordkeeping plan, which does not contain any guidance specific to managing asbestos records. We expected that WorkSafe would have a plan for keeping asbestos licence records to ensure such information could be easily identified and accessible, but this was not the case. The State Records Commission requires the recordkeeping policies and procedures of an entity to cover all aspects of their business operations.

We found that WorkSafe could not easily retrieve records because of the way they were stored. Records of restricted licence applications were held as part of a batch containing the files of multiple applicants approved at the same time. Records for unrestricted licence applications were held in discrete files. Since our audit, WorkSafe has amended the way it stores records for restricted licence approvals and now keeps a discrete file for each. This means the records can be more easily retrieved, for example, when a renewal application is received or if the licence holder is found to not be complying with licence conditions.

Although there is no requirement to maintain a public register on WorkSafe's website, the register of licensees on the website was not up-to-date and could not be relied on by the public for accurate information. We found the register was not updated each month, as stated on the website, resulting in expired licences being listed. Because of the risk that members of the public could employ an unlicensed person or business to remove asbestos, WorkSafe removed the register from its website after we informed them of our finding. The website has been recently updated.

Improved processes for managing conflicts of interest and reviewing decisions would minimise the risk of inappropriate approvals

Management of licensing staff's conflicts of interests required improvement. DMIRS' conflict of interest policy requires staff to declare and manage their conflicts in a register. We found that not all managerial staff had access to the full register. Further, the declarations of licensing staff from the former Department of Commerce were not transferred into the current register following the 2017 machinery of government changes. This means the register may not hold all conflicts of interest, and any declared conflicts may not be properly managed. Properly recording and managing conflicts of interest helps to ensure licensing decisions are appropriate and unbiased.

WorkSafe relied on senior staff to review application assessments and approve them, however, there was no regular review of decisions to ensure consistency between different staff. It is good practice to perform quality assurance checks over licensing approvals, which include checking from time to time that systems and processes are operating as intended. Without consistent decisions, there is an increased chance that licences could be issued to applicants without the appropriate training and experience.

Monitoring and compliance activities provide limited assurance that regulation is effective

WorkSafe did not collect information to assess whether its asbestos removal licensing regime is effective. Its monitoring and compliance activities for asbestos removal licensing were not well targeted to risk and did not provide quality information for analysis and reporting. If WorkSafe does not generate and use good quality monitoring data to target and coordinate its compliance and monitoring activities, it cannot be sure it is using its resources in the most efficient manner to achieve good regulatory outcomes.

Audits of licensees are performed but are not comprehensive

WorkSafe met its annual targets of 350 audits of asbestos removal licence holders. These records-based audits involve reviewing documentation and systems at the licensees' place of business, but they do not include inspections of worksites where asbestos is removed, which is the source of potential harm to workers and the community. While WorkSafe's auditors check receipts from waste disposal facilities for asbestos removal jobs, this does not extend to checking for the safe disposal of materials at waste disposal facilities. WorkSafe aims to audit all asbestos removal licensees over a rolling 3-year period to check that they are complying with the conditions of their licences. Its auditors also audit demolition licensees, and WorkSafe registered assessors who assess competencies for high risk work licences.

WorkSafe could improve its audits of licensees to ensure audits are more comprehensive, effective, and focus on the greatest risk of non-compliance. We found that WorkSafe auditors were not performing all auditing procedures routinely. In addition, we also identified 4 instances (14%) from a sample of 28 audit records where there was no evidence that WorkSafe performed a follow-up audit after non-compliance issues were identified. These weaknesses could significantly undermine the effectiveness of the audit process and the overall regulatory regime.

We also found that there are opportunities for WorkSafe to better use complaint information to inform its audit program. For example, if WorkSafe receives significant complaints about a licensee, the scheduled audit for that licensee is not brought forward. By using complaints information to re-prioritise the audit schedule, WorkSafe may have better opportunities to identify licence holders who are not complying with their licence conditions.

Audits of unrestricted licensees do not check to see that unrestricted licensees notify WorkSafe when workers who deal with friable asbestos are employed or terminated. This is a mandatory licence condition. Audits will be less effective in identifying non-compliant practices, if important requirements are not checked.

There is no guidance for asbestos auditors on minimum compliance standards. To determine when a follow-up audit is required, WorkSafe uses a minimum standard for assessing compliance with licence conditions. However, this minimum standard is not defined in its audit procedures nor in any other guidance document. One consequence of this is that WorkSafe auditors are using their own judgment as to whether licensees meet the minimum standard. This could lead to inconsistent decisions about future regulatory action including whether follow-up audits are required.

On-site inspections of friable asbestos removal work were performed, but poorly documented

WorkSafe did not have policies and procedures to guide decisions about whether an on-site inspection is required when friable asbestos is removed. All unrestricted licence holders are required under their licences to notify WorkSafe when friable asbestos is removed. A WorkSafe officer assesses whether an on-site inspection is required, but this assessment is based on their professional judgement. Given that these inspections provide an important insight into whether licensees are demonstrating safe asbestos removal practices, it is critical that decisions to perform inspections are risk based, consistently made using documented policies and procedures, and transparently documented.

WorkSafe's data suggests that 100 on-site inspections were performed from a total of 391 notifications (25.6%) of friable asbestos removal jobs in the period between 1 July 2014 and 30 June 2019. These on-site inspections are performed by a team of 1-3 people and only involve inspections of the worksites where asbestos is removed. WorkSafe has a comprehensive Quality Inspection Policy to help guide the inspectors' work.

We examined a sample of 20 notifications where the system showed that an inspection took place and found that recordkeeping was poor. In particular:

- no photos nor any evidence to support the inspectors' findings were recorded. Inspectors issued improvement notices for 2 of these inspections
- there were 4 instances where there was insufficient documentary evidence to indicate that an on-site visit actually took place.

We also found that workplaces of restricted licence holders are visited but only when complaints are investigated by WorkSafe. This is because on-site inspections are not part of WorkSafe's routine audit procedures, and currently there is no legislative requirement for restricted licence holders to notify WorkSafe of their asbestos removal jobs in advance. Performing on-site inspections of restricted licence holders will help ensure that these licensees are removing asbestos safely.

Good documentation of on-site inspections and outcomes would help WorkSafe to assess the effectiveness of the regulatory regime. It would also assist to identify potential problems or non-compliance issues for addressing in future proactive campaigns, or to take action against operators that are exposing the community to harm.

There are gaps in monitoring and compliance activities

While WorkSafe has some proactive campaigns for managing asbestos in workplaces (refer to the proactive WorkSafe campaigns below) these are not clearly aligned with asbestos removal regulations, and we identified gaps in how WorkSafe coordinates its proactive and reactive monitoring and compliance activities. We found shortcomings with the collection and use of its complaints data to monitor and improve the asbestos removal licensing program. These gaps increase the risk that unlicensed asbestos removalists, or those using unsafe practices, may go undetected.

Proactive education and awareness raising is considered a first step in encouraging compliance and promoting good regulatory outcomes.

Proactive WorkSafe campaigns developed for properly managing asbestos in workplaces include:

- **Asbestos-containing material in government 2019-20** (underway) to promote industry awareness about requirements relating to asbestos-containing material and improve compliance with asbestos regulations in State and local government entities
- **Safety of workers in schools 2019-20** (underway) is focused on safety of workers in WA primary and secondary schools. The campaign is addressing a wide range of safety and health issues including hazardous substances
- **Asbestos in rail cars project 2017-18** looked to see whether industry had adequate systems in place to ensure imported plant and equipment does not contain asbestos.

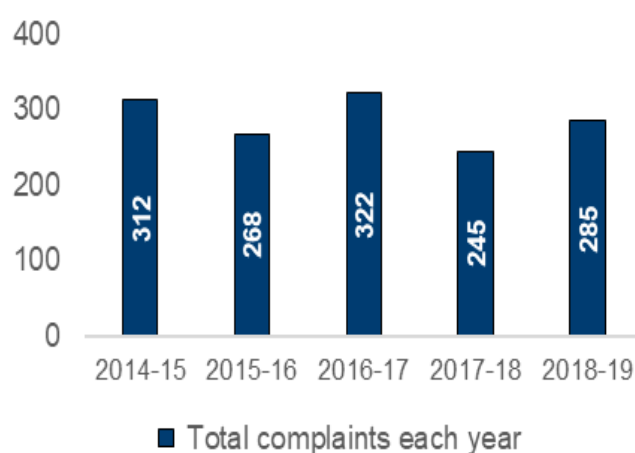
Source: OAG using information provided by WorkSafe

WorkSafe does not know how effective its system for documenting and responding to complaints is. Its management of asbestos-related complaints, and the investigations of the complaints, is a key component of its compliance and monitoring program. However, we found WorkSafe has not:

- analysed complaints data. In keeping with good practice, complaints data should be analysed to determine whether the licensing regime is working well, to assist with identifying any unlicensed individuals and entities removing asbestos, and to inform proactive campaigns

- undertaken an internal audit or review of the complaints process. In keeping with best practice principles, we expected to find the process periodically reviewed to identify areas for administrative improvements to ensure complaints are dealt with promptly, courteously and in accordance with their assigned priority.

Further, it was not always clear how investigations of complaints not assigned a priority are completed. We found this in our analysis of 1,432 complaints made between 1 July 2014 and 30 June 2019 supplied to us by WorkSafe³ (Figure 3 shows the total numbers of complaints in recent years). Over the 5-year period, we found 6.5% (93) of all complaints were never assigned a priority rating but were shown in the system as completed investigations. Management advised that this could be due to the matter being dealt with personally by the manager. However, this was not always evident from the data we were given.



Source: OAG using information provided by WorkSafe

Figure 3: Total numbers of complaints made to WorkSafe about asbestos matters between 1 July 2014 to 30 June 2019

Collection and use of intelligence to inform the program could be improved

WorkSafe's guidance and mechanisms to help staff to use information about asbestos-related issues from the public or public sector entities require improvement to better inform its proactive campaigns or identify potential non-compliance issues. For example, WorkSafe:

- receives some information on demolition approvals from local governments. However, WorkSafe told us it is not always practical to act on this information because not all local governments advise it that asbestos will be involved in demolition work.
- does not collect information about the amount of asbestos disposed at waste facilities.

A clear plan for the collection and use of information from stakeholders would improve how WorkSafe use resources to identify instances of non-compliance. WorkSafe introduced a new online tool in 2019 to address this issue.

Good quality information is not available for reporting to executive

Limitations in the way WorkSafe records and manages compliance data meant that the executive team, and other decision-makers and stakeholders, had limited visibility into whether asbestos removal regulation was effective. We acknowledge that some of

³ Data extract based on a keyword search for the term "asbestos" to identify asbestos-related complaints

WorkSafe's systems do not have the functionality to easily report on performance and are set to be replaced when funding allows. However, we found:

- only the numbers of worksite visits for all hazardous materials are reported to executive in aggregate and no information is reported for asbestos regulation specifically or about inspection findings for any regulatory activity
- only the numbers of audits undertaken each year are reported to executive and no information is reported about audit findings
- complaint and investigation information about asbestos matters is not captured in a form that can easily be analysed to identify potential issues and trends. Consequently, WorkSafe has not done any analysis of complaints data, and does not know how many complaints relate to asbestos removal.

According to better practice principles, the outcomes of monitoring and compliance activities should be reported periodically to accountable decision-makers so they can assess if the program is effective. As we did not find this to be the case, WorkSafe may be missing opportunities to ensure the program reflects risk priorities and to address matters of non-compliance.

Appendix 1: Asbestos licensing requirements

Licensing requirements ⁴		
	Restricted licence	Unrestricted licence
New licence fee	\$875.00	\$14,910.00
Renewal licence fee	\$810.00	\$11,680.00
Licence period	3 years	3 years
Licence applies to	Removal of greater than 10sqm non-friable asbestos	Removal of friable and non-friable asbestos
Licence conditions	Licence holders must adhere to the following:	
	<ol style="list-style-type: none"> 1. all removal of asbestos materials from structures is carried out in accordance with the <i>Occupational Safety and Health Act 1984</i>, OSH Regulations 1996 and the Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC: 2002 (2005)] (the Code) 2. a record of the training provided to each person who carries out asbestos removal work is kept for a minimum of 5 years 3. a copy of the Safe Work Method Statement for each asbestos removal job is kept for a minimum of 5 years 4. a copy of the receipt issued by the waste disposal facility, to which asbestos material is transported for disposal, is kept for a minimum of 5 years 5. the holder of the Restricted Asbestos Licence will report to the WorkSafe Commissioner any asbestos removal incidents where a person was, or was likely to have been, exposed to asbestos fibres at levels above the exposure standard 6. the holder of the Restricted Asbestos Licence is subject to auditing and must co-operate with officers of WorkSafe 7. if the licence holder is a company, and the responsible nominee is no longer engaged with the company, the Commissioner must be advised immediately 	<ol style="list-style-type: none"> 1. all removal of friable asbestos materials from structures is carried out in accordance with the <i>Occupational Safety and Health Act 1984</i>, OSH Regulations 1996 and the Code 2. give the WorkSafe Western Australia Commissioner 7 days prior notification before commencing the removal of friable asbestos material from a building or structure 3. a copy of the notification to remove friable asbestos is kept for a minimum period of 5 years 4. a record of the training provided to each person who carries out unrestricted asbestos work, as required by the Code, is kept for a minimum period of 5 years 5. a copy of the Asbestos Removal Control Plan, as required by the Code, for each asbestos removal job, is kept for a minimum period of 5 years 6. the holder of the Unrestricted Asbestos Licence will report to the WorkSafe Commissioner any asbestos removal incidents where a person was, or was likely to have been, exposed to asbestos fibres at levels above the exposure standard 7. a copy of the asbestos Clearance Certificate issued by a competent person, as required by the Code, for each asbestos removal job, is kept for a minimum period of 5 years

⁴ As per Department of Mines, Industry Regulation and Safety [website](#), accessed 19 September 2018

	<p>8. any variations to the conditions made by the WorkSafe Commissioner.</p>	<p>8. a copy of the receipt issued by the waste disposal facility, to which asbestos material is transported for disposal, is kept for a minimum period of 5 years</p> <p>9. the Chief Operations Officer of the Department of Fire and Emergency Services (DFES) is to be notified of all intended friable asbestos removal work from buildings</p> <p>10. the holder of the Unrestricted Asbestos licence is subject to auditing and must co-operate with officers of WorkSafe, including answering questions and allowing full access to all documents relating to carrying out friable asbestos work</p> <p>11. if the licence holder is a company, and the responsible nominee is no longer engaged with the company, the Commissioner must be advised immediately</p> <p>12. unrestricted asbestos licence holders must within 7 days notify the WorkSafe Commissioner of the engagement event and termination event of employees or contractors who work with friable asbestos-containing material</p> <p>13. any variations to the conditions made by the WorkSafe Commissioner.</p>
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Source: OAG

Appendix 2: Full response of the Department of Mines, Industry Regulation and Safety and the WorkSafe Western Australia Commissioner to the recommendations of the audit

Recommendations

To strengthen its regulation of asbestos removal, the WorkSafe Commissioner, through the Department of Mines, Industry Regulation and Safety (DMIRS) should:

1. Develop processes which allow for on-site inspections of worksites where asbestos is removed by restricted licence holders.

WorkSafe response: Agree

Implementation timeframe: by July 2021

WorkSafe transferred the compliance functions for asbestos to the Occupational Health, Hygiene and Noise team (OHHN) in February 2019, allocated a specific inspector with relevant skills to asbestos related investigations and transferred responsibility for the management of its audit function to the inspectorate (July 2019). More recently, in August 2019, the Government announced an additional 21 inspectors would be engaged by WorkSafe. DMIRS has allocated two of these additional inspector positions as Specified Calling inspectors to undertake on-site inspections of worksites where asbestos is removed by restricted licenced holders.

Asbestos is a WorkSafe priority and the only hazardous substance to be allocated this amount of WorkSafe resources.

Complaints, RTAs or notifications received by WorkSafe are triaged and appropriately allocated to inspectors with the necessary skills, experience and training to undertake workplace inspections.

Auditors, at the time of the audit, were engaged to undertake a paper based desktop audit are badged as inspectors so that they are able to exercise powers granted to inspectors within the OSH Act. WorkSafe inspectors, who are undertaking on-site inspections of worksites where asbestos is removed by licence holders, are appointed as inspectors. There are consistent elements in their training, particularly in relation to inspector powers. However:

- Auditors undertake desktop audits of documents. These audits were administrative and clerical in nature.
- WorkSafe inspectors undertaking on-site inspections of worksites where asbestos is removed require different skills and experiences. An asbestos removal licence is a threshold qualification which authorises asbestos removal work to be undertaken. In addition to the specific asbestos requirements identified in the OSH regulations, asbestos removal work must be undertaken consistent with the requirements prescribed in the OSH Act and other applicable OSH regulations. Typically, a science qualification is a threshold requirement for this inspector role. When conducting their inspections, these inspectors consider all aspects of the OSH Act and OSH regulations.

Subsequent to the time of the OAG audit there have been some operational changes which have led to the auditors moving more toward a traditional inspector role. At the time of the OAG audit the auditors were not provided with the training to perform

inspections, however, with the change of operational approach this training has now commenced and will result in increased inspections and improved auditing processes.

2. Update its documented guidance for:

- a. assessing licence applications and provide staff with structured training to use it**
- b. auditing licence holders to ensure audits are comprehensive.**

WorkSafe response: Agree

Implementation timeframe: by July 2020 (recommendation 2a) and December 2020 (recommendation 2b)

- a. The Licensing Services Directorate of DMIRS will work towards improving documented guidance and structured training by July 2020.
- b. All audits are conducted using checklists for each asbestos removal licence type and assess adherence to licence conditions and regulatory requirements. The Commissioner and DMIRS will review the audit process to enhance the comprehensiveness of auditing processes.

3. Improve its recordkeeping practices to:

- a. ensure licensing decisions are well documented for transparency and consistency**
- b. include specific procedures in a DMIRS recordkeeping plan for asbestos removal licensing records**
- c. clearly document the results of on-site inspections of unrestricted licensees, including the initial off-site assessment by DMIRS that determines whether an inspection is required.**

WorkSafe response: Agree

Implementation timeframe: by July 2020 (3a) and December 2020 (3c). Recommendation 3b has been completed.

- a/b The Department has an approved Record Keeping Plan which meets *State Records Act 2000* requirements. The Plan is a high level document that does not require detail for specific desktop and or operational processes and procedures. All key operational procedures and policies are stored within the departmental Quality Management System (QMS) application which is accessible to all departmental staff. A process for the management of Asbestos Removal Licensing files will be developed and stored within the departmental QMS.
- c WorkSafe is now documenting the reasons for the decision about whether an inspection will occur as a result of receiving a prescribed notification. This includes comprehensive instructions and supporting documentation in relation to inspector activities. These resources also include a Quality Inspection Policy which supports the legislative framework established by the OSH Act. The Quality Inspection Policy provides best practice guidelines for inspectors and includes requirements for all relevant details from an inspection to be entered into the WorkSafe Information Systems Environment (WISE) within 24 hours or the next business day. The Quality Inspection Policy provides a list of the details as guidance. There are also instructions for inspectors to record and store their notes. WISE is used to keep operational records. When these records are done according to the Quality Inspection Policy, it is not necessary to also write reports. Photographs are taken when operationally useful and are not required for every investigation or

circumstance. WorkSafe will undertake a review of WISE entries at periodic intervals to ensure compliance with the policy.

4. Ensure its program to audit asbestos removal licence holders, and decisions regarding inspections, are targeted to the greatest risk of non-compliance, or harm to workers or the public, to maximise the effectiveness of regulatory resources.

WorkSafe response: Agree

Implementation timeframe: by December 2020

WorkSafe will undertake a review to ensure existing audit processes and decisions in relation to inspections are effective so as to manage licence and regulation non-compliance and thereby minimise risks to workers or the public.

To maximise the effectiveness of operations with the available resources, different inspectors are allocated for audits and asbestos removal workplaces. Inspectors conducting desktop audits are not required to have the same investigation and work experiences and qualification required for inspectors conducting workplace visits.

The auditors currently undertake annual desktop audits of around 350 asbestos removal licence holders. The audits are conducted based on the documentation requirements of the OSH regulations and conditions imposed on the asbestos removal licence holders. The audits prioritise non-compliant asbestos removalists.

Since February 2019, WorkSafe has allocated an inspector with environmental health experience and qualifications to undertake on-site inspections of worksites where asbestos is removed by licenced asbestos removalists. This single inspector's time has been allocated to primarily address complaints, RTAs and notifications received by WorkSafe and is supported by other OHHN team members and inspectors when required. With the available resources, there has been limited opportunity for this inspector and DMIRS to undertake strategic proactive asbestos removal related campaigns. However, with the two additional inspectors approved by the Government, more resources will be allocated to strategic proactive interventions. WorkSafe is factoring these additional resources into its business planning process. Decisions about the allocation of inspector resources are risk based.

The auditors now receive formal advice about asbestos removal licence holder non-compliance issues from the WorkSafe OHHN Manager. The appointment of a dedicated WorkSafe asbestos inspector, has increased the number of these reports received by audit. As part of its business planning process, the referral process will be integrated and formalised.

5. Perform an internal audit or review of its complaints management processes.

WorkSafe response: Agree, in relation to asbestos licensing

Implementation timeframe: by July 2021

In 2018/19, WorkSafe conducted 2,828 reactive investigations spread across the 496 ANZSIC groups that approximate to being within the jurisdiction of the OSH Act groups. The ANZSIC industry class that would deal with asbestos removal is 2922 – Waste Remediation and Materials Recovery Services.

As part of WorkSafe's role to regulate workplace health and safety, it provides frontline customer service channels including digital service delivery so employers, employees and members of the public can seek further information or register their complaints relating to workplace hazards or incidents.

In addition to the prescribed notifications, WorkSafe accepts inbound complaints and RTAs including those regarding the safe removal practices of Asbestos Containing

Materials (ACM). Members of the public, employers and employees are able to report instances where it is not clear whether the removal of ACM is occurring within the requirements of the OSH legislation.

WorkSafe has established complaints, RTA and prescribed notifications procedures which outlines the process that customer service staff use to record an inbound customer generated report of unsafe removal of ACM.

There are limitations on WorkSafe's ability to obtain data from WISE, which supports the process of receiving and allocating occupational safety and health complaints, and has been in operation since 1995. WISE does not have the technological capacity to provide WorkSafe with reports relating to the removal of ACM. WorkSafe, and more broadly DMIRS, is looking at purchasing a contemporary investigations system which will facilitate superior access to data and overcome existing system imposed limitations. In addition, the system will be required to provide the ability to more effectively manage inspector activities. The Minister for Industrial Relations has approved a review by DMIRS to determine the needs of WorkSafe in order to upgrade the computer system used by WorkSafe.

WorkSafe will refer this matter to internal audit to consider whether it should be included in the internal audit program.

6. Ensure conflicts of interest are managed appropriately by:

- a. allowing managerial staff access to the conflicts of interest register**
- b. transferring conflicts of interest declared by employees of the former Department of Commerce into the current DMIRS register.**

WorkSafe response: Agree, in relation to asbestos licensing

Implementation timeframe: by December 2020 (recommendation 6b). Recommendation 6a has been completed.

- a. DMIRS Human Resources has developed a dashboard to monitor conflict of interest declarations [that] has been launched. Managers are being provided with training on the use of the conflict of interest dashboard.

Through the dashboard, every line manager will be able to access declared conflict of interests and the approved management plan for those employees that report directly to them. The delegated approver (Group Head/ Division Head (Executive Director)) also has access to employee's conflict of interest declarations within their structural group through their own dashboard. The General Manager Human Resources and Director General will have access to all employee conflict of interest declarations.

At this stage, other managers between the line manager and delegated approver, for example *General Manager*, will not have access to the details of the employee conflict of interest declarations through their dashboard. This will require some further discussion regarding the risk and impact on the employee's confidentiality. Upon request to the General Manager Human Resources, these managers may access the conflict of interest declarations for the employee/s within their reporting line.

- b. In 2017, when the *DMIRS Conflict of Interest Policy, Guideline and Procedure* was launched, whole of department communication instructed employees to transfer their paper-based conflict of interest declaration onto the DMIRS eForm.

The existence of current paper-based conflict of interest declarations is not known to Human Resources, so their transition to the eForm process cannot be monitored (by

Human Resources). The responsibility for the transition should be managed by Licensing Services managers.

Human Resources will further communicate with all staff in DMIRS, to remind of the importance to transfer existing paper-based conflict of interest declarations to the DMIRS eForm.

7. Improve the collection and management of data to:

- a. analyse its complaints data to inform its monitoring and compliance activities**
- b. use information from the public and other government entities, including waste disposal facilities, to inform its proactive programs and identify potential non-compliance issues**
- c. better report to the WorkSafe Commissioner and/or the Director General of DMIRS on the results of on-site inspections, audits, and potential issues and trends identified from complaints and investigation information so they can take action.**

WorkSafe response: Agree

Implementation timeframe: by December 2020

- a. WorkSafe's regulatory enforcement activities, customer interactions and divisional operational activity statistics are recorded in WISE.

WorkSafe's call centre officers enter the details provided about complaints and RTAs into WISE. While complaints and RTAs can identify employers such as asbestos removal licence holders, this is not always the case. A record in WISE is also kept of the Call Centre referral to the Manager and then the inspector. This covers all complaints and is not limited to complaints regarding asbestos. Prescribed asbestos notifications are received by WorkSafe and also data entered into WISE.

Inspector activities, including inspections and details about improvement notices issued, are also entered against the individual employer or asbestos licence removal holders in WISE. Before attending a workplace or conducting an inspection, it is standard practice for WorkSafe inspectors to review information available on WISE.

WorkSafe has limited resources for the purposes of data analysis. The WISE system, which commenced operation in 1995, also has limitations. WorkSafe and more broadly, DMIRS is looking at purchasing a contemporary investigations system which will facilitate superior access to data and overcome existing system imposed limitations.

WorkSafe's ability to respond to asbestos complaints has improved greatly since the employment of two dedicated WorkSafe inspectors with industry specific knowledge in hazards related to asbestos. The inspectors are supported by the OHHN team.

When a complaint or prescribed notification is received by WorkSafe in relation to asbestos, all information received is entered into WISE as an RTA and referred to the OHHN Manager who then creates and allocates the RTA for investigation by a WorkSafe inspector. The inspector is also provided with all the information received.

- b. WorkSafe makes significant use of complaints and information received from members of the public to inform its inspections of asbestos removal work. This is the main source of enforcement activity in this area.

The OAG report is not specific as to the type of information obtainable from waste disposal facilities that may influence a proactive or compliance program. WorkSafe is aware of available information from other agencies. As a generalisation, this information has not been useful for achieving compliance with the OSH regulations. There is no legislated requirement for waste facilities to record asbestos disposals against asbestos removal licence holders. Such a requirement is likely to require prescription through regulations, impose costs and require significant consultation.

From the information available the benefits of using this information are not immediately apparent however, WorkSafe will make further inquiries in relation to this recommendation.

- c. WorkSafe is supportive of reporting further details to executive where appropriate.

Asbestos related matters, while significant, constitute one of many occupational safety and health hazards over which WorkSafe has compliance responsibilities. WorkSafe management and reporting structures routinely ensure that matters requiring attention of senior management are reported, either to the WorkSafe Western Australia Commissioner, Executive Management Committee, Deputy Director General, Safety Regulation, or Director General as appropriate.

Asbestos inspectors via Principal Scientific Officer (PSO) report directly to the Director Service Industries and Specialists. The priority placed on asbestos results in significant management time is allocated to asbestos management. If matters require attention by senior management, the Director is ideally placed to raise those matters appropriately.

While there are limitations with WorkSafe's current WISE software providing for limited analysis of complaint and investigation related trends. WorkSafe will ensure consultation with senior managers and the WorkSafe Western Australia Commissioner is undertaken to determine the needs of a regular report on asbestos removal work.

Auditor General's reports

Report number	2019-20 reports	Date tabled
21	Audit Results Report – Annual 2019 Financial Audits	12 May 2020
20	Local Government Contract Extensions and Variations and Ministerial Notice Not Required	4 May 2020
19	Control of Monies Held for Specific Purposes	30 April 2020
18	Information Systems Audit Report 2020 – State Government Entities	6 April 2020
17	Controls Over Purchasing Cards	27 March 2020
16	Audit Results Report – Annual 2018-19 Financial Audit of Local Government Entities	11 March 2020
15	Opinion on Ministerial Notification	28 February 2020
14	Opinion on Ministerial Notification	31 January 2020
13	Fee-setting by the Department of Primary Industries and Regional Development and Western Australia Police Force	4 December 2019
12	Audit Results Report – Annual 2018-19 Financial Audits of State Government Entities	14 November 2019
11	Opinion on Ministerial Notification	30 October 2019
10	Working with Children Checks – Follow-up	23 October 2019
9	An Analysis of the Department of Health's Data Relating to State-Managed Adult Mental Health Services from 2013 to 2017	9 October 2019
8	Opinions on Ministerial Notifications	8 October 2019
7	Opinion on Ministerial Notification	26 September 2019
6	Opinions on Ministerial Notifications	18 September 2019
5	Fraud Prevention in Local Government	15 August 2019
4	Access to State-Managed Adult Mental Health Services	14 August 2019
3	Delivering Western Australia's Ambulance Services – Follow-up Audit	31 July 2019
2	Opinion on Ministerial Notification	26 July 2019
1	Opinions on Ministerial Notifications	19 July 2019

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