

Alex Avenue Public School (SSD 9368): Submission of Independent Audit Report and response in accordance with Condition C34 and C35

I refer to Alex Avenue Public School approved on the 21st May 2020.

In accordance, with condition C34 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

- Galungara Operations Independent Audit #3 Report_Rev 2

As per the requirements of condition C35 the Department must be issued with a response from the proponent to the Independent Audit Report, therefore the following attachments are provided for your information:

- Attachment A – Response to Independent Audit non-compliances
- Attachment B - Response to Independent Audit recommendations

Additionally, in accordance, with condition C34(c) of the Development Consent and with at least 7 days' notice, please be advised that the Department intend to make the Audit Report and response publicly available on it's website, within 60 days following the submission of this letter.

Attachment A – Response to Independent Audit non-compliances

CoC	Consent heading	Compliance Requirement	Auditor's Finding & Recommendation	SINSW Response and Actions	Status
A25	Access to Information	CoC A25 requires information and documents (as they are obtained or approved) to be made publicly available on the Project website. This is to occur at least 48 hours before the commencement of construction and until the completion of all works under the consent.	Review of the SINSW website identified that some of the required operational documentation is not published e.g. D20 Green Travel Plan, D21 OTAMP or E1 Out of Hours Event Management Plan.	Non-compliance noted. GTP & OTAMP have been uploaded to the school's website. Please note that the requirement for an Out of Hours Event Management Plan has not been triggered.	Closed.
C34	Independent Environmental Audit	Requires the Applicant/Proponent to: <ul style="list-style-type: none"> (a) review and respond to each Independent Audit Report prepared under condition C31 of this consent, or condition C32 where notice is given; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary. 	<p>Confirm applicant's response available on the Project website and in accordance with Condition C34.</p> <p>Applicant's response to Independent Audit #1 (Aspect, July 2020) is not published on SINSW website.</p>	Non-compliance noted. Reported to DPIE on 16/10/20. The findings and the independent audit report were posted on the day of the 2nd Independent Audit site inspection, 28/1/22.	Closed.
E9	Hours of Operation for Waste Collection and Outdoor Maintenance	Requires waste collection and ground maintenance using powered equipment to be undertaken during the hours of 7.30am to 6pm Monday to Friday	<p>The Operational Waste Management Plan (2021) does not reference or contain the condition requirements.</p> <p>No waste disposal records have been provided to demonstrate compliance with this condition. Review waste collection contractor engagement. No reference to E9 prescribed hours.</p> <p>Advice during site interview 16/12/21 is that collection occasionally occurs outside the prescribed hours.</p> <p>No complaints received to date.</p> <p>Communicate the requirements of the waste collection service hours to the contractor per Condition A26 and E9.</p>	<p>Evidence received via email from the School Principal advising that correct times were adhered to for waste collection and ground maintenance.</p> <p>Hours for waste collection have been recommunicated to waste contractor.</p>	Closed.



Attachment B – Response to Independent Audit recommendations

Compliance Requirement	Audit Observation/ Improvement Opportunities	Department of Education Actions	Evidence of actions	Status
<p>CoC A25 requires information and documents (as they are obtained or approved) to be made publicly available on the Project website. Part (viii) requires a complaint register to be uploaded and updated monthly.</p>	<p>As part of consultation for the independent audit, Blacktown City Council identified several community complaints in their correspondence. The Project complaints register does not identify any complaints for the audit period. Indicates that the CCS may not be working as intended. Further clarification is being pursued by the project team to align complaints records</p>	<p>DoE has investigated all complaints raised by the IEA to establish whether complaints have been raised to the school or SINSW for acknowledgement and action. SINSW working on improvements to ensure CCS is as effective as possible at managing & identifying community complaints.</p>	<p>Advice received from the school noting that none of the complaints that the IEA received from Blacktown City Council were actually related to the operation of the school. Matters raised were closed out with council directly and the school was not notified of any issues or concerns.</p>	<p>Closed</p>
<p>CoC A26 Requires the Applicant to ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</p>	<p>The Pre-Operations Compliance Report (15/07/20) identifies against A26 "Contractor undertaken toolbox prior to commencement on site". No toolbox provided demonstrating compliance. Toolbox would normally be utilised as a construction-based communication method. No evidence was provided to demonstrate how this condition has been satisfied during operations. The application of A26 to conditions related to operations is uncertain in respect of school staff and contractors. While handover documentation has been identified, there is no subsequent evidence demonstrating induction and communication to school staff, and contractors pertaining to the operational conditions under Part E. Confirmation of applicability of A26 to post occupation conditions (Part E) should be sought with the Department of Planning.</p>	<p>DoE was to ensure that that the school understood its operational consent responsibilities</p>	<p>Evidence provided through meeting minutes up until January 2021 and prior to commencement that specifically states the Part A & E conditions required to be complied with.</p>	<p>Closed</p>

