# Audit, Risk and Improvement Committee

# Minutes

Monday 27 July 2026

CITY OF BELMONT

# Audit, Risk and Improvement Committee

## Minutes

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Monday 27 July 2026

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**Elected Members are reminded to retain their confidential papers for discussion with the minutes.**

**Minutes of the Audit, Risk and Improvement Committee held in the Function Room, City of Belmont Civic Centre, 215 Wright Street, Cloverdale on Monday 27 July 2026 commencing at 6:30pm.**

# Minutes

### Present

| | |
|---|---|
| Mr J Seth | Presiding Member |
| Ms S Zulsdorf | Deputy Presiding Member |
| Mayor R Rossi JP | Mayor |
| Cr J Harris | Central Ward |
| Cr B Ryan | East Ward |
| Cr J Davis | South Ward |
| Cr C Kulczycki | West Ward |

### In attendance

| | |
|---|---|
| Mr J Christie | Chief Executive Officer |
| Mr S Downing | Director Corporate and Governance |
| Mr M Murphy | Director Infrastructure Services |
| Ms C Bridges | Executive Manager People and Culture |
| Mr M Hayward | Manager Design, Assets and Development |
| Ms E Kania | Manager Governance and Legal |
| Mr M Sapsworth | Manager ICT & Digital Services |
| Mr J Rechner | Senior Internal Auditor |
| Ms E Nicholls (dep 6:33pm, ret. 6:35pm) | Coordinator Governance |
| Ms S Bell | Senior Governance Officer |
| Ms E Whiteley (dep. 6:36pm) | Compliance Officer |

### Observers

| | |
|---|---|
| Ms J Burges | Deputy of the Presiding Member |
| Cr D Sessions (Via Microsoft Teams) | West Ward |

### Members of the gallery

There were no members of the public in the gallery and no press representatives.

# 1 Official Opening

**6:30pm The Presiding Member welcomed all those in attendance and declared the meeting open.**

The Presiding Member read aloud the Acknowledgement of Country.

| Acknowledgement of Country |
|---|
| Before I begin, I would like to acknowledge the Whadjuk Noongar people as the Traditional Owners of this land and pay my respects to Elders past, present and emerging.<br>I further acknowledge their cultural heritage, beliefs, connection and relationship with this land which continues today. |

# 2 Apologies and leave of absence

Nil.

# 3 Declarations of interest that might cause a conflict

## 3.1 Financial interests

Nil.

## 3.2 Disclosure of interest that may affect impartiality

Nil.

# 4 Announcements by the Presiding Member (without discussion)

## 4.1 Announcements

'I would like to welcome Ms Joanne Burges as Deputy of the Presiding Member, who is in attendance this evening as an observer. Ms Burges' appointment has been made in accordance with legislated requirements. Independent members strengthens the City's Audit, Risk and Improvement Committee.'

## 4.2 Declarations by Members who have not given due consideration to all matters contained in the business papers presently before the meeting

Nil.

# 5 Public Submission Time

**6:33pm The Presiding Member opened the period allotted for Public Submission Time. No Public Submissions were received.**

**6:33pm The Presiding Member closed Public Submission Time.**

**6:33pm The Coordinator Governance departed the meeting.**

# 6 Confirmation of Minutes

## 6.1 Audit, Risk and Improvement Committee Meeting held 18 May 2026

| Officer Recommendation |
| --- |
| **Rossi moved, Davis seconded**<br><br>That the Minutes of the Audit, Risk and Improvement Committee Meeting held on 18 May 2026 be confirmed as a true and accurate record.<br><br>**Carried Unanimously 7 votes to 0**<br><br>For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan<br><br>Against: Nil |

# 7 New business of an urgent nature approved by the person presiding or by decision

Nil.

# 8 Questions by Members on which due notice has been given (without discussion)

Nil.

# 9 Questions by members without notice

Nil.

# 10 Business adjourned from a previous meeting

Nil.

# 11 Information items

## 11.1 Audit Log – Office of the Auditor General and Other Audits

An Audit Log (refer Confidential Attachment 11.1.1) has been developed to capture and report on progress of all recommended actions from previous audit reports as requested by the Audit, Risk and Improvement Committee.

The Audit Log will be included for information on all Audit, Risk and Improvement Committee Agendas. Questions from Committee Members are welcome.

**Note:**

**The Presiding Member advised that in accordance with Section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*, the Committee will need to go behind closed doors if there are any questions on Confidential Attachment for this item.**

**6:37pm Harris moved, Ms Zulsdorf seconded that in accordance with Section 5.23(e) and (f) of the *Local Government Act 1995 (WA)*, the meeting will proceed behind closed doors to allow questions on the Confidential Attachment for Item 11.1.**

**Carried Unanimously 7 votes to 0**

For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan

Against: Nil

**6:41pm The meeting came out from behind closed doors. No members of the public returned to the meeting.**

Consistent with section 5.23(8) of the *Local Government Act 1995 (WA)*, the following is provided regarding the decision to go behind closed doors.

**(a) the decision**

The decision to go behind closed doors is included at page 8 of these minutes.

**(b) the subsection under which the decision is made and, if that subsection is subsection (2) or (4), the paragraph of that subsection under which the decision is made**

The decision to go behind closed doors was made pursuant to section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*.

**(c) if the provision recorded under paragraph (b) is subsection (2)(c) or (4)(g) — the applicable regulation (including any applicable subregulation or paragraph)**

Not applicable.

**(d) if the provision recorded under paragraph (b) is subsection (2)(d) or (4)(h) — a statement that a direction was given under section 5.23AA(1) or (2) (as the case requires)**

Not applicable.

**(e) an explanation of how the matter or information to which the decision relates falls within the scope of the provision recorded under paragraph (b)**

The information contained in the confidential attachment, and the questions relating to the confidential attachment from Committee Members related to information that if made public would be likely to endanger the security of the City's properties and operations, and impair the effectiveness of any lawful method or procedure for preventing, detecting, investigating or dealing with any contravention or possible contravention of the law.

**(f) a summary of the steps taken to ensure that the closure to members of the public is for no longer than required or authorised under the provision recorded under paragraph (b)**

The Committee only discussed item 11.1 behind closed doors. As soon as questions were asked and answered, the Committee immediately moved a procedural motion to reopen the meeting to the public.

**(g) any prescribed information**

There is no prescribed information contained in the *Local Government (Administration) Regulations 1996 (WA)* relevant to this section.

## Attachment details

| Attachment No and title | |
|---|---|
| 1. | CONFIDENTIAL REDACTED - Audit Log - Office of the Auditor General and other Audits (Confidential Matter in accordance with the Local Government Act 1995 (WA) Section 5.23(4)(e)(f)) [**11.1.1** - 12 pages] |

## 11.2 Quality Assurance and Improvement Program 2026

The Quality Assurance and Improvement Program 2026 Report (refer Confidential Attachment 11.2.1) is presented as an information item to the Audit, Risk and Improvement Committee and Council to comply with Standard 8.3 of the Global Internal Audit Standards (GIAS).

The Quality Assurance and Improvement Program 2026 Report include:

- June 2026 self-assessment to confirm that the internal audit function remains fully compliant with GIAS.
- Measurement of Internal Audit Performance based on the total number of internal audits completed and the total number of findings identified in 2025-26.
- Customer satisfaction survey results from internal audits completed in 2025-26.
- Annual declaration from the Chief Audit Executive (i.e. Senior Internal Auditor) that the internal audit function:
    - Remained independent during 2025-26.
    - Is sufficiently resourced to complete the annual internal audit plan and maintain compliance with the GIAS.
    - Achieved an overall average of 4.5 out of a possible 5 in customer satisfaction survey results.

**Note:**
**The Presiding Member advised that in accordance with Section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*, the Committee will need to go behind closed doors if there are any questions on Confidential Attachment for this item.**

**6:42pm Rossi moved, Harris seconded that in accordance with Section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*, the meeting will proceed behind closed to allow questions on the Confidential Attachment for Item 11.2.**

**Carried Unanimously 7 votes to 0**

For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan

Against: Nil

**6:45pm The meeting came out from behind closed doors. No members of the public returned to the meeting.**

Consistent with section 5.23(8) of the *Local Government Act 1995 (WA)*, the following is provided regarding the decision to go behind closed doors.

**(a) the decision**

The decision to go behind closed doors is included at page 10 of these minutes.

**(b) the subsection under which the decision is made and, if that subsection is subsection (2) or (4), the paragraph of that subsection under which the decision is made**

The decision to go behind closed doors was made pursuant to section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*.

**(c) if the provision recorded under paragraph (b) is subsection (2)(c) or (4)(g) — the applicable regulation (including any applicable subregulation or paragraph)**

Not applicable.

**(d) if the provision recorded under paragraph (b) is subsection (2)(d) or (4)(h) — a statement that a direction was given under section 5.23AA(1) or (2) (as the case requires)**

Not applicable.

**(e) an explanation of how the matter or information to which the decision relates falls within the scope of the provision recorded under paragraph (b)**

The information contained in the confidential attachment, and the questions relating to the confidential attachment from Committee Members related to information that if made public would be likely to endanger the security of the City's properties and operations, and impair the effectiveness of any lawful method or procedure for preventing, detecting, investigating or dealing with any contravention or possible contravention of the law.

**(f) a summary of the steps taken to ensure that the closure to members of the public is for no longer than required or authorised under the provision recorded under paragraph (b)**

The Committee only discussed item 11.2 behind closed doors. As soon as questions were asked and answered, the Committee immediately moved a procedural motion to reopen the meeting to the public.

**(g) any prescribed information**

There is no prescribed information contained in the *Local Government (Administration) Regulations 1996 (WA)* relevant to this section.

## Attachment details

| Attachment No and title | |
|---|---|
| 1. | CONFIDENTIAL REDACTED - Quality Assurance and Improvement Program (Confidential Matter in accordance with the Local Government Act 1995 (WA) Section 5.23(4)(e)(f)) [**11.2.1** - 5 pages] |

# 12 Items requiring recommendation to Council

**Note: Item 12.1 - 2025 Compliance Audit Return**

**This item was brought forward for discussion prior to Items 11.1 and 11.2 at the request of the Presiding Member.** **(Refer to Page 8).**

**6:35pm The Coordinator Governance returned to the meeting.**

## 12.1 2025 Compliance Audit Return

| | | |
|---|---|---|
| Voting Requirement | : | Simple Majority |
| Subject Index | : | 39/005 |
| Location/Property Index | : | N/A |
| Application Index | : | N/A |
| Disclosure of any Interest | : | Nil |
| Previous Items | : | ARIC 17 February 2025;<br>OCM 25 March 2025 Item 11.1 |
| Applicant | : | N/A |
| Owner | : | N/A |
| Responsible Division | : | Corporate and Governance |

### Council role

| | |
|---|---|
| **Overseeing** | Overseeing the allocation of the City's finances and resources e.g. setting the annual budget, accepting tenders, determining what services and facilities the City is to provide, annual reports, selecting the CEO and reviewing the CEO's performance. |

### Purpose of report

To provide Council with the outcomes of the statutory Compliance Audit Return ("CAR") for the period 1 January 2025 to 31 December 2025 as provided for in Attachment 12.1.1.

### Summary and key issues

- It is a requirement of the *Local Government Act 1995 (WA)* (the Act) that all local governments carry out an audit of compliance.
- Following the amendments to the Act and the commencement of the Local Government Inspector (the Inspector) the submission of the 2025 CAR was delayed until September 2026.

- The Inspector is now responsible for the administration of the CAR including the approval of the form and questions for the CAR.
- The Inspector has now provided the questions for the 2025 CAR.
- Although the questions are in a different format for 2025, they are similar to previous year's questions.
- The 2025 audit questions focus on key areas of potential non-compliance as in previous years. The City of Belmont's 2025 compliance score is 100%. The 2024 score was 100%.

**Officer Recommendation**

**Rossi moved, Kulczycki seconded**

That the Audit, Risk and Improvement Committee recommend that Council:

1. Receive and adopt the 2025 Compliance Audit Return responses as provided in Attachment 12.1.1.
2. Authorise the Mayor and Chief Executive Officer to complete the Joint Certification of the 2025 Compliance Audit Return.
3. Direct the Chief Executive Officer to submit the certified 2025 Compliance Audit Return and a copy of the minutes relevant to this report to the Local Government Inspector by 30 September 2026 in accordance with the *Local Government (Audit) Regulations 1996 (WA).*

**Carried Unanimously 7 votes to 0**

For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan

Against: Nil

**6:36pm The Compliance Officer departed the meeting and did not return.**

## Location

Not applicable.

## Consultation

There has been no specific consultation undertaken in respect to this matter.

## Strategic Community Plan implications

In accordance with the 2024–2034 Strategic Community Plan:

**Key Performance Area: Performance**

**Outcome:** 10. Effective leadership, governance and financial management.

## Policy implications

There are no policy implications associated with this report.

## Statutory environment

Regulation 14 of the *Local Government (Audit) Regulations 1996 (WA)* (the Regulations) requires that a compliance audit for the period 1 January to 31 December is completed each year in a form approved by the Inspector. Regulation 14 also requires the Audit, Risk and Improvement Committee (ARIC) to review the CAR and present those results to Council. The CAR is then to be adopted by Council and recorded in the minutes.

Regulation 15 of the Regulations requires that after the adoption by Council of the CAR, a certified copy (signed by both the Mayor and Chief Executive Officer) of the return, together with a copy of the minutes of the meeting in which the return was adopted with any additional information is required to be submitted to the Inspector by 30 September 2026.

## Background

The compliance audit period is 1 January 2025 to 31 December 2025. Once the audit is completed the City is required to:

1. Present the CAR to ARIC for consideration and endorsement.
2. ARIC to recommend the CAR to Council.
3. Seek Council's endorsement of the completed CAR.
4. Return the endorsed and certified CAR, along with a copy of the Council Minutes, to the Inspector by 30 September 2026.

In compiling the CAR, designated officers have undertaken an audit of the City's activities, practices and procedures applicable to each section.

The City’s draft responses to the 2025 CAR questions are detailed in Attachment 12.1.1. The response will be submitted to the Inspector once Council has resolved its satisfaction with the contents of the return, and it has been jointly certified by the Mayor and Chief Executive Officer.

## Report

Following receipt of the CAR questions from the Inspector in late June 2026, the City’s officers determined responses to questions in the CAR. To further substantiate responses, the City has opted to provide evidence through citation of items from the City’s Council Meeting Minutes and documents registered in the Electronic Document Management System (ECM). Reference is also made to information contained in hard copy files, which includes original copies of Elected Member and designated officers’ Primary and Annual Returns.

The questions in the CAR should be read with the relevant extract of the *Local Government Act 1995 (WA)* (the Act) and/or associated Regulations.

The 2025 CAR contains 82 questions relating to 96 legislative areas as prescribed in Regulation 13 of the *Local Government (Audit) Regulations 1997 (WA)*, across the following pieces of legislation -

- *Local Government Act 1995 (WA)*
- *Local Government (Administration) Regulations 1996 (WA)*
- *Local Government (Audit) Regulations 1996 (WA)*
- *Local Government (Constitution) Regulations 1998 (WA)*
- *Local Government (Elections) Regulations 1997 (WA)*
- *Local Government (Financial Management) Regulations 1996 (WA)*
- *Local Government (Functions and General) Regulations 1996 (WA)*

The City’s 2025 Compliance Score is 100%.

The attached responses to the 2025 CAR are in the format provided by the Inspectorate. Following ARIC consideration and Council endorsement, the responses will be submitted to the Inspector and the final version printed for certification, by the Mayor and CEO. The certified copy is then uploaded to the Local Government Inspector’s portal together with an extract of the minutes.

## Financial implications

There are no financial implications evident at this time.

## Environmental implications

There are no environmental implications associated with this report.

## Social implications

There are no social implications associated with this report.

## Attachment details

| Attachment No and title |
| --- |
| 1. Compliance Audit Return 2025 - Draft [**12.1.1** - 19 pages]<br>2. Compliance Audit Return 2025 - Final [**12.1.2** - 27 pages] |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| **Local Government Act 1995** | | | | | |
| 1 | s2.29 | Has every person elected or appointed to a mayor, president, deputy, or councillor role made the required declaration in the prescribed form before a prescribed person, prior to acting in the office | Governance | Yes | Refer to Special Council Meeting Minutes – 20 October 2025. |
| 2 | s3.16 | Has the local government reviewed local laws which have not been reviewed in the previous 8 years, to ensure compliance with Schedule 9.3, Clause 65 | Compliance | N/A | The Consolidated Local Law 2020 and Standing Orders are within the prescribed time frame and not due for review. The Health Local Laws are being reviewed in 2026. |
| 3 | s3.57 | Subject to Local Government (Functions and General) Regulations 1996, regulation 11(2), did the local government invite tenders for all contracts for the supply of goods or services where the consideration under the contract was, or was expected to be, worth more than the consideration stated in regulation 11(1) of the Regulations? | Procurement and Contracts | Yes | Refer to ECM subject: *Tenders 114/2025*. |
| 4 | s. 3.58(3) | Where the local government disposed of property other than by public auction or tender, did it dispose of the property in accordance with section 3.58(3) of the Local Government Act 1995 (unless section 3.58(5) applies)? | City Facilities and Property | Yes | Refer to ECM 6101223 |
| 5 | s. 3.58(4) | Where the local government disposed of property under section 3.58(3) of the Local Government Act 1995, did it provide details, as prescribed by section 3.58(4) of the Act, in the required local public notice for each disposal of property? | City Facilities and Property | N/A | Not applicable. The transaction referenced in Item 4 was exempt from public notice requirements under Regulation 30(2)(b) of the Local Government (Functions and General) Regulations 1996 as the tenant is a |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | | | | registered Not-for-Profit organisation. Therefore, the notice disclosure requirements under section 3.58(4) do not apply. |
| 6 | s. 3.59(2)(a) | Has the local government prepared a business plan for each major trading undertaking that was not exempt in 2025? | City Facilities and Property / Economic Development | N/A | None carried out for 2025 |
| 7 | s. 3.59(2)(b) | Has the local government prepared a business plan for each major land transaction that was not exempt in 2025? | City Facilities and Property | N/A | None carried out for 2025 |
| 8 | s. 3.59(2)(c) | Has the local government prepared a business plan before entering into each land transaction that was preparatory to entry into a major land transaction in 2025? | City Facilities and Property | N/A | None carried out for 2025 |
| 9 | s. 3.59(4) | Has the local government complied with public notice and publishing requirements for each proposal to commence a major trading undertaking or enter into a major land transaction or a land transaction that is preparatory to a major land transaction for 2025? | City Facilities and Property | N/A | None carried out for 2025 |
| 10 | s. 3.59(5) | During 2025, did the council resolve to proceed with each major land transaction or trading undertaking by absolute majority? | City Facilities and Property | N/A | None carried out for 2025 |
| 11 | s. 5.16 (1) | Were all delegations to committees resolved by absolute majority? | Compliance | N/A | No delegations to committees |
| 12 | s. 5.16 (2) | Were all delegations to committees in writing? | Compliance | N/A | No delegations to committees |

**COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | | | | |
| 13 | s. 5.17 | Were all delegations to committees within the limits specified in section 5.17 of the Local Government Act 1995? | Compliance | N/A | No delegations to committees |
| 14 | s. 5.18 | Were all delegations to committees recorded in a register of delegations? | Compliance | Yes | Referenced in Delegations Register for 2024/2025 and 2025/2026 |
| 15 | s. 5.36(4) & s. 5.37(3) | Were all CEO and/or senior employee vacancies advertised in accordance with Local Government (Administration) Regulations 1996, regulation 18A? | People and Culture | Not applicable | No vacancies. |
| 16 | s. 5.37(2) | Did the CEO inform council of each proposal to employ or dismiss senior employee?<br><br>Where council rejected a CEO's recommendation to employ or dismiss a senior employee, did it inform the CEO of the reasons for doing so? | People and Culture | Not applicable | The city does not have any designated senior employees. |
| 17 | s. 5.39B | Has the local government adopted and maintained model standards that incorporate the prescribed model standards within required timeframes (including amendments), ensured adoption by absolute majority, published an up-to-date version on its official website, and avoided including any inconsistent additional provisions? | Governance | Yes | For CAR period 1/1/2025-31/12/2025 Code of Conduct version dated 29/4/2024. Following legislative amendments 1/1/26, reviewed and adopted at March 2026 Ordinary Council Meeting.<br><br>Available on official website (About Us - Our Council – Governance – Code of Conduct)<br><br>Additional provisions are not inconsistent with Standard. Adopted |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | | | | at March 2026 Ordinary Council Meeting. |
| 18 | s. 5.42 | Were all delegations to the CEO resolved by an absolute majority?<br><br>Were all delegations to the CEO in writing? | Compliance | Yes | Refer Council Minutes OCM 24 June 2025 Item 12.5 |
| 19 | s. 5.43 | Did the powers and duties delegated to the CEO exclude those listed in section 5.43 of the Local Government Act 1995? | Compliance | Yes | Refer Council Minutes OCM 24 June 2025 Item 12.5 & Delegations Register 2024-2025 & 2025-2026 |
| 20 | s. 5.44(2) | Were all employees delegated authority by the CEO under Section 5.44(1), issued with a written instrument of delegation? | Compliance | Yes | Refer ECM Folder 11/005 |
| 21 | s. 5.45(1)(b) | Were all decisions by the Council to amend or revoke a delegation made by absolute majority? | Compliance | N/A | No amendments to Council delegations |
| 22 | s. 5.46 | Has the CEO kept a register of all delegations made under Division 4 of the Local Government Act 1995 to the CEO and to employees?<br><br>Were all delegations made under Division 4 reviewed by the delegator at least once during the 2024/2025 financial year?<br><br>Did all persons exercising a delegated power or duty under the Act keep, on all occasions, a written record in accordance with Local Government (Administration) Regulations 1996, regulation 19? | Compliance | Yes | Refer Delegations Register 2024-2025 & 2025-2026<br><br>Reviewed by Council and CEO in June 2025 as part of the annual review process<br><br>Refer ECM Folder 11/005 |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| 23 | s. 5.50 | If the local government paid a finishing employee an amount in addition to their entitlement, did the local government follow a policy it had adopted and published on the website? outlining the circumstances in relation to payments made to terminated employees?<br><br>If the local government made a payment to a finishing employee that is more than the amount set out in the policy, was local public notice given? | People and Culture | Not applicable | No additional payments above entitlement were paid. |
| 24 | s. 5.51A | Has the CEO prepared and implemented a code of conduct to be observed by employees of the local government?<br><br>If yes, has the CEO published an up-to-date version of the code of conduct for employees on the local government's website? | People and Culture | Yes | |
| 25 | s. 5.67 | Where a council member disclosed an interest in a matter and did not have participation approval under sections 5.68 or 5.69 of the Local Government Act 1995, did the council member ensure that they did not remain present to participate in discussion or decision making relating to the matter? | Governance | N/A | Where disclosures were made, no instances were recorded of a member participating in discussion or decision making. |
| 26 | s. 5.68(2) | Were all decisions regarding participation approval in relation to Section 5.68(2), including the extent of participation allowed and, where relevant, the information required by the Local Government (Administration) Regulations 1996 regulation 21A, recorded in the minutes of the relevant council or committee meeting? | Governance | N/A | No instances recorded of participation approval being sought by Council. |

**COMPLIANCE AUDIT RETURN 2025** **Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | | | | |
| 27 | s. 5.69(5) | Were all decisions regarding participation approval in relation to Section 5.69(5), including the extent of participation allowed recorded in the minutes of the relevant council or committee meeting? | Governance | N/A | No instances recorded of participation approval being sought. |
| 28 | s. 5.70 | Where an employee had an interest in any matter in respect of which the employee provided advice or a report directly to council or a committee, did that person disclose the nature and extent of that interest when giving the advice or report? | Governance | Yes | Refer to minutes of the relevant meeting(s). |
| 29 | s. 5.71B(5) and (7) | Where council applied to the Minister to allow the CEO to provide advice or a report to which a disclosure under section 5.71A(1) of the Local Government Act 1995 relates, did the application include details of the nature of the interest disclosed and any other information required by the Minister for the purposes of the application?<br><br>Was any decision made by the Minister under section 5.71B(6) of the Local Government Act 1995, recorded in the minutes of the council meeting at which the decision was considered? | Governance | N/A | No instances recorded of participation approval being sought from the Minister. |
| 30 | s. 5.73 | Were disclosures under sections 5.65, 5.70 or 5.71A(3) of the Local Government Act 1995 recorded in the minutes of the meeting at which the disclosures were made? | Governance | Yes | Refer to minutes of the relevant meeting(s). |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| 31 | s. 5.75 | Was a primary return in the prescribed form lodged by all relevant persons within three months of their start day? | Compliance | Yes | Refer ECM folder163/001 and relevant disclosure folder held by records if received in hardcopy |
| 32 | s. 5.76 | Was an annual return in the prescribed form lodged by all relevant persons by 31 August 2025? | Compliance | Yes | Refer ECM folder 163/001 |
| 33 | s. 5.77 | On receipt of a primary or annual return, did the CEO, or the Mayor/President, as the case may be, give written acknowledgment of having received the return? | Compliance | Yes | Refer ECM folder 163/001 |
| 34 | s. 5.88 | Did the CEO keep a register of financial interests which contained the returns lodged under sections 5.75 and 5.76 of the Local Government Act 1995?<br><br>Did the CEO keep a register of financial interests which contained a record of disclosures made under sections 5.65, 5.70, 5.71 and 5.71A of the Local Government Act 1995, in the form prescribed in the Local Government (Administration) Regulations 1996, regulation 28?<br><br>After a person ceased to be a person required to lodge a return under sections 5.75 and 5.76 of the Local Government Act 1995, did the CEO remove from the register all returns relating to that person?<br><br>Have all returns removed from the register in accordance with section 5.88(3) of the Local Government Act 1995 been kept for a period of at least five years after the person who lodged the return(s) ceased to be a person required to lodge a return? | Compliance | Yes | Hardcopies located in compliance files in the Records area<br><br>All returns have been removed and retained in accordance with the statutory requirements. |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| 35 | s. 5.89A | Did the CEO keep a register of gifts which contained a record of disclosures made under sections 5.87A and 5.87B of the Local Government Act 1995, in the form prescribed in the Local Government (Administration) Regulations 1996, regulation 28A?<br><br>Did the CEO publish an up-to-date version of the gift register on the local government's website? | Compliance | Yes | DSID 4937126 Elected Members and CEO (published on website) & DSID 4777945 Gift Register – Elected Members and CEO Below Regulatory threshold. |
| 36 | s. 5.90A | Did the local government prepare, adopt by absolute majority and publish an up-to-date version on the local government's website, a policy dealing with the attendance of council members and the CEO at events? | Governance | Yes | Adopted at May 2026 Ordinary Council Meeting. Available on official website (About Us - Our Council – Governance - Policies and standards) |
| 37 | s5.94 | Does the local government have information available for members of the public to inspect, free of charge as prescribed under section 5.94 and Admin Reg 29, except where restricted under this section? | Compliance | Yes | |
| 38 | s5.96 | Where a person is entitled to inspect information under this Division, can the local government confirm that copies are available and that the price at which it sells copies does not exceed the cost of providing them, (unless prescribed otherwise)? | Compliance | Yes | |
| 39 | s5.96A | Did the CEO publish information on the local government's website in accordance with sections 5.96A(1), (2), (3), and (4) of the Local Government Act 1995? | Compliance | Yes | Quarterly compliance checks undertaken. |
| 40 | s5.104 | Did the local government prepare and adopt, by absolute majority, a code of conduct to be observed by | Compliance | Yes | Code of Conduct last reviewed 29/4/24. |

**COMPLIANCE AUDIT RETURN 2025** **Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | council members, committee members and candidates that incorporates the model code of conduct?<br><br>Did the local government adopt additional requirements in addition to the model code of conduct? If yes, does it comply with section 5.104(3) and (4) of the Local Government Act 1995?<br><br>Has the CEO published an up-to-date version of the code of conduct for council members, committee members and candidates on the local government's website? | | Yes<br><br>Yes | Note: Code of conduct has been updated following the 1/1/2026 amendments. Car Responses relate to 1/1/2025-31/12/2025.<br><br>Up to date version published on website. |
| 41 | s. 5.128 | Did the local government prepare and adopt (by absolute majority) a policy in relation to the continuing professional development of council members? | Governance | Yes | CP21 – Elected Member Professional Development and Authorised Travel Amended 23/7/24. Note Policy was Presented to December 2025 OCM policy review and deferred - Adopted at February 2026 Ordinary Council Meeting. Available on official website (About Us - Our Council – Governance - Policies and standards) |
| 42 | s. 7.12A(3), (4) and (5) | Where the local government determined that matters raised in the auditor's report prepared under section 7.9(1) of the Local Government Act 1995 required action to be taken, did the local government ensure that appropriate action was undertaken in respect of those matters?<br><br>Where matters identified as significant were reported in the auditor's report, did the local government prepare a report that stated what action the local government had | Internal Audit | Yes<br><br>N/A | All audit recommendations are inputted into an audit log to ensure appropriate action is undertaken.<br><br>No audit findings were identified by the Office of the Auditor General (OAG) as significant. |

**COMPLIANCE AUDIT RETURN 2025** **Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | taken or intended to take with respect to each of those matters?<br><br>Was a copy of the report given to the Minister within three months of the audit report being received by the local government?<br><br>Within 14 days after the local government gave a report to the Minister under section 7.12A(4)(b) of the Local Government Act 1995, did the CEO publish a copy of the report on the local government's official website? | | N/A<br><br>N/A | No audit findings were identified by the Office of the Auditor General (OAG) as significant.<br><br>No audit findings were identified by the Office of the Auditor General (OAG) as significant. |
| **Local Government (Administration) Regulations 1996** | | | | | |
| 43 | Reg 18F | Was the remuneration and other benefits paid to a CEO on appointment the same remuneration and benefits advertised for the position under section 5.36(4) of the Local Government Act 1995? | People and Culture | Not applicable | No vacancy or appointment in 2025 |
| 44 | Reg 19AB | Does the code of conduct contain the requirement that a local government employee (not including the CEO) must not accept a prohibited gift from an associated person? | People and Culture | Yes | S6.16 (c) & (d) |
| 45 | Reg 19AC | Does the local government's code of conduct include requirements for the recording, storing, disclosure, and use of information relating to gifts accepted by local government employees (excluding the CEO) from associated persons, in accordance with regulatory requirements? | People and Culture | Yes | Refer section 6.16 |

**COMPLIANCE AUDIT RETURN 2025** **Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| 46 | Reg 19AE | Does the local government's code of conduct include requirements addressing employee behaviour in the performance of duties, interactions with others, use and disclosure of information, use of local government resources and finances, the keeping of records, and the reporting and management of suspected breaches and misconduct, in accordance with regulatory requirements? | People and Culture | Yes | Areas listed are covered in sections of the Code of conduct and are referenced in multiple sections. |
| 47 | Reg 19B | Did the local government include in its annual report all information required under section 5.53(2)(g) and (i) and regulation 3A(2), including number of employee's in salary bands over $130,000, remuneration and allowances paid, ordered payments, CEO remuneration, council member meeting attendance, available demographic information about council members, and details of any modifications to the strategic community plan or significant modifications to the corporate business plan? | Governance | Yes | Refer to Annual Report 2024-25:<br>• number of employees in salary bands over $130,000 - Page 11<br>• remuneration and allowances paid - Pages 33, 34<br>• ordered payments - N/A<br>• CEO remuneration - Page 109<br>• council member meeting attendance - Page 31<br>• available demographic information about council members - Page 4<br>• details of any modifications to the strategic community plan or significant modifications to the corporate business plan - N/A |
| 48 | Reg 19C | Has the local government adopted by absolute majority a strategic community plan? If yes, provide the date of the most recent review | Strategic Planning | Yes | Refer OCM 25 June 2025, Major Review. Strategic Community Plan 2024-2034 |
| 49 | Reg 19DA | Has the local government reviewed its corporate business plan in accordance with Admin Regulation 19DA(4) ? If yes, provide date of review | Strategic Planning | Yes | Refer OCM 24 June 2025 Item 12.4 |

**COMPLIANCE AUDIT RETURN 2025** **Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | Does the corporate business plan comply with the requirements of Local Government (Administration) Regulations 1996 19DA(2) & (3)? | | | |
| *50* | *Reg 22* | *Asked as part of question s5.75* | | | *No response required. Refer earlier questions as referenced* |
| *51* | *Reg 23* | *Asked as part of question s5.76* | | | *No response required. Refer earlier questions as referenced* |
| *52* | *Reg 28* | *Asked as part of question s5.88(1)* | | | *No response required. Refer earlier questions as referenced* |
| *53* | *Reg 28A* | *Asked as part of question s5.89A(1)* | | | *No response required. Refer earlier questions as referenced* |
| *54* | *Reg 29* | *Asked as part of question s5.94* | | | *No response required. Refer earlier questions as referenced* |
| 55 | Reg 29C | Does the local government publish all prescribed information on its official website— including up-to-date policies, required details of council member and employee returns, council member fees and allowances, and relevant public notices—within the specified timeframes and in accordance with legislative requirements? | Compliance | Yes | Compliance undertakes quarterly checks to ensure that items are published as required. Business Improvement also conduct quality check |
| 56 | Reg 35 | Has every local government council member completed and passed the Council Member Essentials course, consisting of the five required modules and delivered by an approved provider, within 12 months of being elected? | Compliance | Yes | ECM DSID 4773154 |
| 57 | Reg 36 | Does the local government appropriately identify and document council members who are exempt from the training requirements under section 5.126(1), including verifying that the member: - has completed an approved course within the specified 5-year period prior to election, or - completed the LGASS00002 Elected Member Skill Set before 1 July 2019 within the relevant | Compliance | Yes | Council members have completed the mandatory training since introduced in 2019 or have completed the Diploma of Local Government as part of their professional development providing Certificates of completion. 2025 |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | timeframe, or - qualifies for the transitional exemption applicable to council members in office at the commencement of the 2019 regulatory amendments | | | newly Elected members are currently completing mandatory modules. Re-elected members were within the statutory timeframes. |
| **Local Government (Audit) Regulations 1996** | | | | | |
| 58 | Reg 10 | Was the auditor's report for the financial year ending 30 June 2025 received by the local government within 30 days of completion of the audit? | Finance | Yes | Audit report was received by the City on 21/11/2025 (DSID 6155444) |
| 59 | Reg 17 | Did the CEO review the appropriateness and effectiveness of the local government's systems and procedures in relation to risk management, internal control and legislative compliance in accordance with Local Government (Audit) Regulations 1996 regulation 17 within the three financial years prior to 31 December 2025? If yes, provide date of council's resolution to accept the report. | Internal Audit | Yes | Regulation 17 Internal Audit Report was presented to Council in August 2025. |
| **Local Government (Constitution) Regulations 1998** | | | | | |
| 60 | Reg 11FA | Did the CEO provide the Minister a report as to the result of the election within 14 days of the declaration and in the form of Form 20 of the Local Government (Elections) Regulations 1997, modified as necessary? | Compliance | Yes | WAEC provided Election Form 20 through LG Elections Portal. 18/10/2025. Form 20 for Deputy Mayoral Election submitted through LG Elections Portal |
| 61 | Reg 13 | Were all required oaths, affirmations and declarations under section 2.42 (in relation to Commissioners) made in the correct form (Form 8), before the appropriate authorised person? | Compliance | N/A | No declarations in relation to Commissioners |
| **Local Government (Elections) Regulations 1997** | | | | | |
| 62 | Reg 30G | Did the CEO establish and maintain an electoral gift register and ensure that all disclosure of gifts forms completed by candidates and donors and received by the CEO were placed on the electoral gift register at the time of receipt by the CEO and in a manner that clearly | Compliance | Yes | No Gifts were disclosed to the CEO for the 2025 election |

**COMPLIANCE AUDIT RETURN 2025** **Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | identifies and distinguishes the forms relating to each candidate in accordance with regulations 30G(1) and 30G(2) of the Local Government (Elections) Regulations 1997? | | | |
| | | Did the CEO remove any disclosure of gifts forms relating to an unsuccessful candidate, or a successful candidate that completed their term of office, from the electoral gift register, and retain those forms separately for a period of at least two years in accordance with regulation 30G(4) of the Local Government (Elections) Regulations 1997? | | N/A | No gifts were disclosed to the CEO for previous elections that were still on the register at the time of recent amendments |
| | | Did the CEO publish an up-to-date version of the electoral gift register on the local government's official website in accordance with regulation 30G(5) of the Local Government (Elections) Regulations 1997? | | YES | ECM 4772695 |
| **Local Government (Financial Management) Regulations 1996** | | | | | |
| 63 | Reg 5 | Has the CEO ensured efficient systems and procedures are established under provisions set out in Financial Management Regulations 5(1)(a) to (g)? | Finance/Internal A | Yes | Regulation 5 Internal Audit Report was presented to Council in August 2025. |
| 64 | Reg 6 | Has the local government ensured that any employee delegated responsibility for day-to-day accounting or financial management operations is not also delegated the responsibility for conducting internal audits, reviewing their own duties, or for managing, directing or supervising someone who carries out these functions? | Finance | Yes | City maintains an independent Internal Audit Function of the Finance Department. |
| 65 | Reg 7 | Did the local government ensure it has regard to the needs of the inhabitants of the district as a whole and not keep separate ward accounts or determine expenditure on the basis of revenue from a ward? | Finance | Yes | |

**COMPLIANCE AUDIT RETURN 2025** **Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| 66 | Reg 8 | Does the local government maintain separate accounts with a bank or other financial institution for money to be held in the municipal fund, trust fund and for reserve account purposes? | Finance | Yes | |
| 67 | Reg 9 | Did the local government keep separate financial records for each trading undertaking and each major land transaction? | Finance | N/A | |
| 68 | Reg 11 | Has the local government developed procedures for the authorisation of, and the payment of, accounts in accordance with Local Government (Financial Management) Regulations 11(1), (2) and (3)? | Finance | Yes | Delegation Register 2025-26 including sub-delegations (DSID 5847302) |
| 69 | Reg 12 | Were payments made from the municipal fund or trust fund made by the CEO under a delegated authority or authorised, in accordance with regulation 13(2), in advance by a council resolution? | Finance | Yes | Delegation Register 2025-26 including sub-delegations (DSID 5847302) |
| 70 | Reg 13 | Can the local government confirm that, where the CEO has been delegated authority to make payments from the municipal or trust fund, the CEO prepared accurate monthly lists that are presented at the next ordinary council meeting and recorded in the minutes that:<br>- include the payee’s name, payment amount, payment date, and sufficient information to identify each transaction where payments have already been made; or<br>- include the payee’s name, payment amount, sufficient information to identify each transaction, and the date of the council meeting (to which the list will be presented) for accounts requiring council approval? | Finance | Yes | An Accounts for Payment Listing is presented to Council each month (refer to ECM subject 54/007: Creditors - Payment Authorisations) |
| 71 | Reg 19 | Did the local government prepare a list each month of all payments made using employee-authorised credit, debit or other purchasing cards, and include the payee’s name, the amount of the payment, the date of the payment, sufficient information to identify the payment, | Finance | Yes | Payments made by credit card and other purchasing cards is included in accounts for Payment Listing presented to Council each month |

**COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025**

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | and present the list at the next ordinary council meeting (and record in the minutes)? | | | (refer to ECM subject 54/007: Creditors - Payment Authorisations) |
| 72 | Reg 19C | Has the local government ensured that all investments made under section 6.14(1) comply with statutory restrictions set out in Financial Management Reg. 19C? | Finance | Yes | Refer CP31 – Investment of Funds policy |
| **Local Government (Functions and General) Regulations 1996** | | | | | |
| *73* | *Reg 7* | *Asked as part of question s3.59(2)* | | | *No response required. Refer earlier questions as referenced* |
| *74* | *Reg 7 Reg 7* | *Asked as part of question s3.59(2)* | | | *No response required. Refer earlier questions as referenced* |
| *75* | *Reg 10* | *Asked as part of question s3.59(2)* | | | *No response required. Refer earlier questions as referenced* |
| 76 | Reg 11A | Did the local government comply with its current purchasing policy, adopted under the Local Government (Functions and General) Regulations 1996, regulations 11A(1) and (3) in relation to the supply of goods or services where the consideration under the contract was, or was expected to be, $250,000 or less or worth $250,000 or less? | Finance | Yes | Refer CP 29 – Purchasing Policy and ECM subject 135/2025: Quotations |
| *77* | *Reg 11* | *Asked as part of question s3.57* | | | *No response required. Refer earlier questions as referenced* |
| 78 | Reg 12 | Did the local government consider the implications of Local Government (Functions and General) Regulations 1996, Regulation 12 when deciding to enter into multiple contracts rather than a single contract? | Finance | N/A | |
| 79 | Reg 14(1), (3) and (5) I | If the local government sought to vary the information supplied to tenderers, was every reasonable step taken to give each person who sought copies of the tender documents, or each acceptable tenderer notice of the variation? | Procurement and Contracts | Yes | Addenda to the Request for Tender were issued via both eTenderBox and the WALGA portal. All registered and invited respondents were automatically notified.<br>Signed addenda were retained and recorded in ECM. |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | | | | |
| 80 | Reg 15 | Did the local government's procedure for receiving and opening tenders comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 15 and 16? | Procurement and Contracts | Yes | All tenders were advertised for a minimum of 14 working days (excluding public holidays) in accordance with Regulation 15.<br>All tenders were opened in accordance with Regulation 16.<br>Refer to the 2025 Tender Register (Ref: 5947639). |
| *81* | *Reg 16* | *Asked as part of question Reg 15* | | | *No response required. Refer earlier questions as referenced* |
| 82 | Reg 17 | Did the information recorded in the local government's tender register comply with the requirements of the Local Government (Functions and General) Regulations 1996, Regulation 17 and did the CEO make the tenders register available for public inspection and publish it on the local government's official website? | Procurement and Contracts | Yes | Refer to the 2025 Tender Register (Ref: 5947639). |
| 83 | Reg 18 (1) and (4) | Did the local government reject any tenders that were not submitted at the place, and within the time, specified in the invitation to tender?<br><br>Were all tenders that were not rejected assessed by the local government via a written evaluation of the extent to which each tender satisfies the criteria for deciding which tender to accept? | Procurement and Contracts | Yes | Tenders not submitted at the place, or within the time specified in the invitation to tender, were considered and rejected in accordance with Regulation 18(1).<br><br>All tenders that were not rejected were assessed through a documented written evaluation against the prescribed criteria, in accordance with Regulation 18(4).<br>Refer to ECM subject: *Tenders 114/2025*. |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| 84 | Reg 19 | Did the CEO give each tenderer written notice containing particulars of the successful tender or advising that no tender was accepted? | Procurement and Contracts | Yes | Refer to ECM subject: *Tenders 114/2025*. |
| 85 | Reg 21 | Does the local government's advertising and expression of interest processes for limiting who can tender comply with the requirements of the Local Government (Functions and General) Regulations 1996, Regulations 21 and 22? | Procurement and Contracts | Yes | Refer to ECM subject: *Expression of Interest 185/2025*. |
| *86* | *Reg 22* | *Asked as part of question Reg 21* | | | *No response required. Refer earlier questions as referenced* |
| 87 | Reg 23 | Did the local government reject any expressions of interest that were not submitted at the place, and within the time, specified in the notice or that failed to comply with any other requirement specified in the notice?<br><br>Were all expressions of interest that were not rejected under the Local Government (Functions and General) Regulations 1996, Regulation 23(1) & (2) assessed by the local government?<br><br>Did the CEO list each person as an acceptable tenderer? | Procurement and Contracts | No<br><br>Yes<br><br>Yes | Refer to ECM subject: *Expression of Interest 185/2025*. |
| 88 | Reg 24 | Did the CEO give each person who submitted an expression of interest a notice in writing of the outcome in accordance with Local Government (Functions and General) Regulations 1996, Regulation 24? | Procurement and Contracts | Yes | Refer to ECM subject: *Expression of Interest 185/2025*. |
| 89 | Reg 24AD(2), (4) and (6) | Did the local government invite applicants for a panel of pre-qualified suppliers via Statewide public notice in accordance with Local Government (Functions & General) Regulations 1996 regulations 24AD( 4) and 24AE? | Procurement and Contracts | No | |

## COMPLIANCE AUDIT RETURN 2025 Period is 1/1/2025-31/12/2025

| | Section | Questions | Area | Yes/No/ Not applicable | Comment |
|---|---|---|---|---|---|
| | | If the local government sought to vary the information supplied to the panel, was every reasonable step taken to give each person who sought detailed information about the proposed panel or each person who submitted an application notice of the variation? | | | |
| *90* | *Reg 24AE* | *Asked as part of question Reg 24AD(2), (4) and (6)* | | | *No response required. Refer earlier questions as referenced* |
| *91* | *Reg 24AF* | *Asked as part of question Reg 24AD(2), (4) and (6)* | | | *No response required. Refer earlier questions as referenced* |
| 92 | Reg 24AG | Did the information recorded in the local government's tender register about panels of pre-qualified suppliers comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 24AG? | Procurement and Contracts | N/A | |
| 93 | Reg 24AH(1) and (3) | Did the local government reject any applications to join a panel of prequalified suppliers that were not submitted at the place, and within the time, specified in the invitation for applications? Were all applications that were not rejected assessed by the local government via a written evaluation of the extent to which each application satisfies the criteria for deciding which application to accept? | Procurement and Contracts | N/A | |
| 94 | Reg 24AI | Did the CEO send each applicant written notice advising them of the outcome of their application? | Procurement and Contracts | N/A | |
| 95 | Reg 24E | Where the local government gave regional price preference, did the local government comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 24E and 24F? | Procurement and Contracts | N/A | |
| *96* | *Reg 24F* | *Asked as part of question Reg 24* | | | *No response required. Refer earlier questions as referenced* |

Local Government Inspector

GOVERNMENT OF WESTERN AUSTRALIA

# 2025 Compliance Audit Return

**Local Government Authority:** The City of Belmont

## *Local Government Act 1995*

**s. 2.29**

Has every person elected or appointed to a mayor, president, deputy, or councillor role made the required declaration in the prescribed form before a prescribed person, prior to acting in the office?

**Response:** Yes

**Comments:** Refer to Special Council Meeting Minutes – 20 October 2025.

**s. 3.16**

Has the local government reviewed local laws, which have not been reviewed in the previous 8 years, to ensure compliance with Schedule 9.3, Clause 65?

**Response:** N/A

**Comments:** The Consolidated Local Law 2020 and Standing Orders are within the prescribed time frame and not due for review. The Health Local Laws are being reviewed in 2026 subject to the implementation of the Public Health Act

**s.3.57**

Subject to Local Government (Functions and General) Regulations 1996, regulation 11(2), did the local government invite tenders for all contracts for the supply of goods or services where the consideration under the contract was, or was expected to be, worth more than the consideration stated in regulation 11(1) of the Regulations?

**Response:** Yes

**Comments:** Refer to ECM subject: Tenders 114/2025.

**s. 3.58(3)**

Where the local government disposed of property other than by public auction or tender, did it dispose of the property in accordance with section 3.58(3) of the Local Government Act 1995 (unless section 3.58(5) applies)?

**Response:** Yes

**Comments:** Refer to ECM 6101223

**s. 3.58(4)**

Where the local government disposed of property under section 3.58(3) of the Local Government Act 1995, did it provide details, as prescribed by section 3.58(4) of the Act, in the required local public notice for each disposal of property?

**Response:** N/A

**Comments:** Not applicable. The transaction referenced in Item 4 was exempt from public notice requirements under Regulation 30(2)(b) of the Local Government (Functions and General) Regulations 1996 as the tenant is a registered Not-for-Profit organisation. Therefore, the notice disclosure requirements under section 3.58(4) do not apply.

**s. 3.59(2)(a)**

Has the local government prepared a business plan for each major trading undertaking that was not exempt in 2025?

**Response:** N/A

**Comments:** None carried out for 2025

**s. 3.59(2)(b)**

Has the local government prepared a business plan for each major land transaction that was not exempt in 2025?

**Response:** N/A

**Comments:** None carried out for 2025

**s. 3.59(2)(c)**

Has the local government prepared a business plan before entering into each land transaction that was preparatory to entry into a major land transaction in 2025?

**Response:** N/A

**Comments:** None carried out for 2025

**s. 3.59(4)**

Has the local government complied with public notice and publishing requirements for each proposal to commence a major trading undertaking or enter into a major land transaction or a land transaction that is preparatory to a major land transaction for 2024?

**Response:** N/A

**Comments:** None carried out for 2025

**s. 3.59(5)**

During 2025, did the council resolve to proceed with each major land transaction or trading undertaking by absolute majority?

**Response:** N/A

**Comments:** None carried out for 2025

**s. 5.16 (1)**

Were all delegations to committees resolved by absolute majority?

**Response:** N/A

**Comments:** No delegations to committees

**s. 5.16 (2)**

Were all delegations to committees in writing?

**Response:** N/A

**Comments:** No delegations to committees

**s. 5.17**

Were all delegations to committees within the limits specified in section 5.17 of the Local Government Act 1995?

**Response:** N/A

**Comments:** No delegations to committees

**s. 5.18**

Were all delegations to committees recorded in a register of delegations?

**Response:** Yes

**Comments:** No delegations to Committees.  Referenced in Delegations Register for 2024/2025 and 2025/2026

**s. 5.36(4) and s. 5.37(3)**

Were all CEO and/or senior employee vacancies advertised in accordance with Local Government (Administration) Regulations 1996, regulation 18A?

**Response:** N/A

**Comments:** No vacancies

**s. 5.37(2)**

Did the CEO inform council of each proposal to employ or dismiss senior employee?

**Response:** N/A

**Comments:** The city does not have any designated senior employees.

Where council rejected a CEO's recommendation to employ or dismiss a senior employee, did it inform the CEO of the reasons for doing so?

**Response:** N/A

**s. 5.39B**

Has the local government adopted and maintained model standards that incorporate the prescribed model standards within required timeframes (including amendments), ensured adoption by absolute majority, published an up-to-date version on its official website, and avoided including any inconsistent additional provisions?

**Response:** Yes

**Comments:** Available on official website (About Us - Our Council – Governance - Policies and Standards

**s. 5.42**

Were all delegations to the CEO resolved by an absolute majority?

**Response:** Yes

**Comments:** Refer Council Minutes OCM 24 June 2025 Item 12.5

Were all delegations to the CEO in writing?

**Response:** Yes

**Comments:** Refer Council Minutes OCM 24 June 2025 Item 12.5 & Delegations Register 2024-2025 & 2025-2026

**s. 5.43**

Did the powers and duties delegated to the CEO exclude those listed in section 5.43 of the Local Government Act 1995?

**Response:** Yes

**Comments:** Refer Council Minutes OCM 24 June 2025 Item 12.5 & Delegations Register 2024-2025 & 2025-2026

**s. 5.44(2)**

Were all employees delegated authority by the CEO under Section 5.44(1), issued with a written instrument of delegation?

**Response:** Yes

**Comments:** Refer ECM Folder 11/005

**s. 5.45(1)(b)**

Were all decisions by the Council to amend or revoke a delegation made by absolute majority?

**Response:** Yes

**Comments:** As part of the annual review some delegations were amended slightly as to wording by Council by absolute majority. No delegations were revoked. . Refer Council Minutes OCM 24 June 2025 Item 12.5 & Delegations Register 2024-2025 & 2025-2026.

**s. 5.46**

Has the CEO kept a register of all delegations made under Division 4 of the Act to the CEO and to employees?

**Response:** Yes

**Comments:** Refer Delegations Register 2024-2025 & 2025-2026

Were all delegations made under Division 4 of the Act reviewed by the delegator at least once during the 2024/2025 financial year?

**Response:** Yes

**Comments:** Reviewed by Council and CEO June 2025 as part of the annual review process

Did all persons exercising a delegated power or duty under the Act keep, on all occasions, a written record in accordance with Local Government (Administration) Regulations 1996, regulation 19?

**Response:** Yes

**Comments:** Refer ECM Folder 11/005

**s. 5.50**

If the local government paid a finishing employee an amount in addition to their entitlement, did the local government follow a policy it had adopted and published on its website outlining the circumstances in relation to payments made to terminated employees?

**Response:** N/A

**Comments:** No additional payments above entitlement were paid.

If the local government made a payment to a finishing employee that is more than the amount set out in the policy, was local public notice given?

**Response:** N/A

**s. 5.51A**

Has the CEO prepared and implemented a code of conduct to be observed by employees of the local government?

**Response:** Yes

Has the CEO published an up-to-date version of the code of conduct for employees on the local government's website?

**Response:** Yes

**s. 5.67**

Where a council member disclosed an interest in a matter and did not have participation approval under sections 5.68 or 5.69 of the Local Government Act 1995, did the council member ensure that they did not remain present to participate in discussion or decision making relating to the matter?

**Response:** N/A

**Comments:** Where disclosures were made, no instances were recorded of a member participating in discussion or decision making.

**s. 5.68(2)**

Were all decisions regarding participation approval in relation to Section 5.68(2), including the extent of participation allowed and, where relevant, the information required by the Local Government (Administration) Regulations 1996 regulation 21A, recorded in the minutes of the relevant council or committee meeting?

**Response:** N/A

**Comments:** Refer to the response above. No instances recorded of participation approval being sought by Council.

**s. 5.69(5)**

Were all decisions regarding participation approval in relation to Section 5.69(5), including the extent of participation allowed recorded in the minutes of the relevant council or committee meeting?

**Response:** N/A

**Comments:** Refer to the response above. No instances recorded of participation approval being sought

**s. 5.70**

Where an employee had an interest in any matter in respect of which the employee provided advice or a report directly to council or a committee, did that person disclose the nature and extent of that interest when giving the advice or report?

**Response:** Yes

**Comments:** Refer to minutes of the relevant meeting(s). The City of Belmont maintains a Register of Interest for Elected Members and Employees as part of the Financial Interest Register. Employee disclosure of interests registered and are recorded in a register. Refer ECM 163/001 & 164/001

**s. 5.71B(5) and (7)**

Where council applied to the Minister to allow the CEO to provide advice or a report to which a disclosure under section 5.71A(1) of the Local Government Act 1995 relates, did the application include details of the nature of the interest disclosed and any other information required by the Minister for the purposes of the application?

**Response:** N/A

**Comments:** No instances recorded of participation approval being sought from the Minister.

Was any decision made by the Minister under section 5.71B(6) of the Local Government Act 1995, recorded in the minutes of the council meeting at which the decision was considered?

**Response:** N/A

**Comments:** No instances recorded of participation approval being sought from the Minister.

**s. 5.73**

Were disclosures under sections 5.65, 5.70 or 5.71A(3) of the Local Government Act 1995 recorded in the minutes of the meeting at which the disclosures were made?

**Response:** Yes

**Comments:** Refer to minutes of the relevant meeting(s).

**s. 5.75**

Was a primary return in the prescribed form lodged by all relevant persons within three months of their start day?

**Response:** Yes

**Comments:** Refer ECM folder163/001 and relevant disclosure folder held by records if received in hardcopy

**s. 5.76**

Was an annual return in the prescribed form lodged by all relevant persons by 31 August 2025?

**Response:** Yes

**Comments:** Refer ECM folder 163/001

**s. 5.77**

On receipt of a primary or annual return, did the CEO, or the Mayor/President, as the case may be, give written acknowledgment of having received the return?

**Response:** Yes

**Comments:** Refer ECM folder 163/001

**s. 5.88**

Did the CEO keep a register of financial interests which contained the returns lodged under sections 5.75 and 5.76 of the Local Government Act 1995?

**Response:** Yes

**Comments:** Hardcopies located in compliance files in the Records area

Did the CEO keep a register of financial interests which contained a record of disclosures made under sections 5.65, 5.70, 5.71 and 5.71A of the Local Government Act 1995, in the form prescribed in the Local Government (Administration) Regulations 1996, regulation 28?

**Response:** Yes

**Comments:** Hardcopies located in compliance files in the Records area

After a person ceased to be a person required to lodge a return under sections 5.75 and 5.76 of the Local Government Act 1995, did the CEO remove from the register all returns relating to that person?

**Response:** Yes

**Comments:** All returns have been removed and retained in accordance with the statutory requirements.

Have all returns removed from the register in accordance with section 5.88(3) of the Local Government Act 1995 been kept for a period of at least five years after the person who lodged the return(s) ceased to be a person required to lodge a return?

**Response:** Yes

**Comments:** All returns have been removed and retained in accordance with the statutory requirements.

**s. 5.89A**

Did the CEO keep a register of gifts which contained a record of disclosures made under sections 5.87A and 5.87B of the Local Government Act 1995, in the form prescribed in the Local Government (Administration) Regulations 1996, regulation 28A?

**Response:** Yes

**Comments:** DSID 4937126 Elected Members and CEO (published on website) & DSID 4777945 Gift Register – Elected Members and CEO Below Regulatory threshold.

Did the CEO publish an up-to-date version of the gift register on the local government's website?

**Response:** Yes

**Comments:** DSID 4937126 Elected Members and CEO

**s. 5.90A**

Did the local government prepare, adopt by absolute majority and publish an up-to-date version on the local government’s website, a policy dealing with the attendance of council members and the CEO at events?

**Response:** Yes

**Comments:** CP17 Attendance at Events: Review presented to December OCM Deferred by Council - Adopted at May 2026 Ordinary Council Meeting. Available on official website (About Us - Our Council – Governance - Policies and standards). This replaced the City’s previous policy.

**s. 5.94**

Does the local government have information available for members of the public to inspect, free of charge as prescribed under section 5.94 and Admin Reg 29, except where restricted under this section?

**Response:** Yes

**s. 5.96**

Where a person is entitled to inspect information under this Division, can the local government confirm that copies are available and that the price at which it sells copies does not exceed the cost of providing them, (unless prescribed otherwise)?

**Response:** Yes

**s. 5.96A**

Did the CEO publish information on the local government's website in accordance with sections 5.96A(1), (2), (3), and (4) of the Local Government Act 1995?

**Response:** Yes

**Comments:** Quarterly compliance checks undertaken.

**s. 5.104**

Did the local government prepare and adopt, by absolute majority, a code of conduct to be observed by council members, committee members and candidates that incorporates the model code of conduct?

**Response:** Yes

**Comments:** Code of Conduct last reviewed 29/4/24.

Note: Code of conduct has been updated following 1/1/2026 amendments. CAR Responses relate to 1/1/2025-31/12/2025.

Did the local government adopt additional requirements in addition to the model code of conduct?

**Response:** Yes

Does it comply with section 5.104(3) and (4) of the Local Government Act 1995?

**Response:** Yes

Has the CEO published an up-to-date version of the code of conduct for council members, committee members and candidates on the local government's website?

**Response:** Yes

**Comments:** Up to date version published on website.

**s. 5.128**

Did the local government prepare and adopt (by absolute majority) a policy in relation to the continuing professional development of council members?

**Response:** Yes

**Comments:** CP21 – Elected Member Professional Development and Authorised Travel Amended 23/7/24. Note Policy was Presented to December 2025 OCM policy review and deferred - Reviewed and

Adopted at February 2026 Ordinary Council Meeting. Available on official website (About Us - Our Council – Governance - Policies and standards)

**s. 7.12A(3), (4) and (5)**

Where the local government determined that matters raised in the auditor's report prepared under section 7.9(1) of the Local Government Act 1995 required action to be taken, did the local government ensure that appropriate action was undertaken in respect of those matters?

**Response:** Yes

**Comments:** All audit recommendations are inputted into an audit log to ensure appropriate action is undertaken.

Where matters identified as significant were reported in the auditor's report, did the local government prepare a report that stated what action the local government had taken or intended to take with respect to each of those matters?

**Response:** N/A

**Comments:** No audit findings were identified by the Office of the Auditor General (OAG) as significant.

Within 14 days after the local government gave a report to the Minister under section 7.12A(4)(b) of the Local Government Act 1995, did the CEO publish a copy of the report on the local government's official website?

**Response:** N/A

**Comments:** No audit findings were identified by the Office of the Auditor General (OAG) as significant.

## *Local Government (Administration) Regulations 1996*

**r. 18F**

Were the remuneration and other benefits paid to a CEO on appointment the same remuneration and benefits advertised for the position under section 5.36(4) of the Local Government Act 1995?

**Response:** N/A

**Comments:** No vacancy or appointment in 2025

**r. 19AB**

Does the code of conduct contain the requirement that a local government employee (not including the CEO) must not accept a prohibited gift from an associated person?

**Response:** Yes

**Comments:** Clause 6.16 (c) & (d)

**r. 19AC**

Does the local government's code of conduct include requirements for the recording, storing, disclosure, and use of information relating to gifts accepted by local government employees (excluding the CEO) from associated persons, in accordance with regulatory requirements?

**Response:** Yes

**Comments:** Refer Clause 6.16

**r. 19AE**

Does the local government's code of conduct include requirements addressing employee behaviour in the performance of duties, interactions with others, use and disclosure of information, use of local government resources and finances, the keeping of records, and the reporting and management of suspected breaches and misconduct, in accordance with regulatory requirements?

**Response:** Yes

**Comments:** Areas listed are covered in clauses of the Code of conduct and are referenced in multiple clauses.

**r. 19B**

Did the local government include in its annual report all information required under section 5.53(2)(g) and (i) and regulation 3A(2), including number of employee's in salary bands over $130,000, remuneration and allowances paid, ordered payments, CEO remuneration, council member meeting attendance, available demographic information about council members, and details of any modifications to the strategic community plan or significant modifications to the corporate business plan?

**Response:** Yes

**Comments:** Refer to Annual Report 2024-25:

- number of employee's in salary bands over $130,000 - Page 11
- remuneration and allowances paid - Pages 33, 34
- ordered payments - N/A
- CEO remuneration - Page 109
- council member meeting attendance - Page 31
- available demographic information about council members - Page 4
- details of any modifications to the strategic community plan or significant modifications to the corporate business plan - N/A

**r. 19C**

Has the local government adopted by absolute majority a strategic community plan?

**Response:** Yes

**Comments:** Refer OCM 24 June 2025 Major Review. Strategic Community Plan 2024-2034

Adoption date or the date of the most recent review: 24/06/2025

**r. 19DA**

Has the local government reviewed its corporate business plan in accordance with Admin Regulation 19DA(4)?

**Response:** Yes

**Comments:** Refer OCM 24 June 2025 Item 12.4

Date of review: 24/06/2025

Does the corporate business plan comply with the requirements of Local Government (Administration) Regulations 1996 19DA(2) & (3)?

**Response:** Yes

**r. 22**

No response required. This is covered by s5.75.

**r. 23**

No response required. This is covered by s5.76.

**r. 28**

No response required. This is covered by s5.88(1).

**r. 28A**

No response required. This is covered by s5.89A(1).

**r. 29**

No response required. This is covered by s5.94.

**r. 29C**

Does the local government publish all prescribed information on its official website— including up-to-date policies, required details of council member and employee returns, council member fees and allowances, and relevant public notices—within the specified timeframes and in accordance with legislative requirements?

**Response:** Yes

**Comments:** Compliance undertakes quarterly checks to ensure that items are published as required. Business Improvement also conduct quality check

**r. 35**

Has every local government council member completed and passed the Council Member Essentials course, consisting of the five required modules and delivered by an approved provider, within 12 months of being elected?

**Response:** Yes

**Comments:** ECM DSID 4773154

**r. 36**

Does the local government appropriately identify and document council members who are exempt from the training requirements under section 5.126(1), including verifying that the member:

- has completed an approved course within the specified 5-year period prior to election, or
- completed the LGASS00002 Elected Member Skill Set before 1 July 2019 within the relevant timeframe, or
- qualifies for the transitional exemption applicable to council members in office at the commencement of the 2019 regulatory amendments?

**Response:** Yes

**Comments:** Council members have completed the mandatory training since introduced in 2019 or have completed the Diploma of Local Government as part of their professional development providing Certificates of completion.    2025 newly Elected members are currently completing mandatory modules. Reelected members were within the statutory timeframes.

## *Local Government (Audit) Regulations 1996*

**r. 10**

Was the auditor's report for the financial year ending 30 June 2025 received by the local government within 30 days of completion of the audit?

**Response:** Yes

**Comments:** Audit report was received by the City on 21/11/2025 (DSID 6155444)

**r. 17**

Did the CEO review the appropriateness and effectiveness of the local government's systems and procedures in relation to risk management, internal control and legislative compliance in accordance with Local Government (Audit) Regulations 1996 regulation 17 within the three financial years prior to 31 December 2025?

**Response:** Yes

**Comments:** Regulation 17 Internal Audit Report was presented to Council in 26 August 2025.

Date of council's resolution to accept the report: 26/08/2025

## *Local Government (Constitution) Regulations 1998*

**r. 11FA**

Did the CEO provide the Minister a report as to the result of the election within 14 days of the declaration and in the form of Form 20 of the Local Government (Elections) Regulations 1997, modified as necessary?

**Response:** Yes

**Comments:** WAEC provided Election Form 20 through LG Elections Portal. 18/10/2025. Form 20 for Deputy Mayoral Election submitted through LG Elections Portal

**r. 13**

Were all required oaths, affirmations and declarations under section 2.42 (in relation to Commissioners) made in the correct form (Form 8), before the appropriate authorised person?

**Response:** N/A

**Comments:** No declarations in relation to Commissioners

## *Local Government (Elections) Regulations 1997*

**r. 30G**

Did the CEO establish and maintain an electoral gift register and ensure that all disclosure of gifts forms completed by candidates and donors and received by the CEO were placed on the electoral gift register at the time of receipt by the CEO and in a manner that clearly identifies and distinguishes the forms relating to each candidate in accordance with regulations 30G(1) and 30G(2) of the Local Government (Elections) Regulations 1997?

**Response:** Yes

**Comments:** No Gifts were disclosed to the CEO for the 2025 election

Did the CEO remove any disclosure of gifts forms relating to an unsuccessful candidate, or a successful candidate that completed their term of office, from the electoral gift register, and retain those forms separately for a period of at least two years in accordance with regulation 30G(4) of the Local Government (Elections) Regulations 1997?

**Response:** N/A

**Comments:** No gifts were disclosed to the CEO for previous elections that were still on the register at the time of recent amendments

Did the CEO publish an up-to-date version of the electoral gift register on the local government's official website in accordance with regulation 30G(5) of the Local Government (Elections) Regulations 1997?

**Response:** Yes

**Comments:** ECM 4772695

## *Local Government (Financial Management) Regulations 1996*

**r. 5**

Has the CEO ensured efficient systems and procedures are established under provisions set out in Financial Management Regulations 5(1)(a) to (g)?

**Response:** Yes

**Comments:** Regulation 5 Internal Audit Report was presented to Council in August 2025.

**r. 6**

Has the local government ensured that any employee delegated responsibility for day-to-day accounting or financial management operations is not also delegated the responsibility for conducting internal audits, reviewing their own duties, or for managing, directing or supervising someone who carries out these functions?

**Response:** Yes

**Comments:** City maintains an independent Internal Audit Function of the Finance Department.

**r. 7**

Did the local government ensure it has regard to the needs of the inhabitants of the district as a whole and not keep separate ward accounts or determine expenditure on the basis of revenue from a ward?

**Response:** Yes

**r. 8**

Does the local government maintain separate accounts with a bank or other financial institution for money to be held in the municipal fund, trust fund and for reserve account purposes?

**Response:** Yes

**r. 9**

Did the local government keep separate financial records for each trading undertaking and each major land transaction?

**Response:** N/A

**r. 11**

Has the local government developed procedures for the authorisation of, and the payment of, accounts in accordance with Local Government (Financial Management) Regulations 11(1), (2) and (3)?

**Response:** Yes

**Comments:** Delegation Register 2025-26 including subdelegations (DSID 5847302)

**r. 12**

Were payments made from the municipal fund or trust fund made by the CEO under a delegated authority or authorised, in accordance with regulation 13(2), in advance by a council resolution?

**Response:** Yes

**Comments:** Delegation Register 2025-26 including subdelegations (DSID 5847302)

**r. 13**

Can the local government confirm that, where the CEO has been delegated authority to make payments from the municipal or trust fund, the CEO prepared accurate monthly lists that are presented at the next ordinary council meeting and recorded in the minutes?

- includes the payee's name, payment amount, payment date, and sufficient information to identify each transaction where payments have already been made; or
- includes the payee's name, payment amount, sufficient information to identify each transaction, and the date of the council meeting (to which the list will be presented) for accounts requiring council approval.

**Response:** Yes

**Comments:** An accounts for Payment Listing is presented to Council each month (refer to ECM subject 54/007: Creditors - Payment Authorisations )

**r. 13A**

Did the local government prepare a list each month of all payments made using employee-authorised credit, debit or other purchasing cards, and include the payee’s name, the amount of the payment, the date of the payment, sufficient information to identify the payment, and present the list at the next ordinary council meeting (and record in the minutes)?

**Response:** Yes

**Comments:** Payments made by credit card and other purchasing cards is included in accounts for Payment Listing presented to Council each month (refer to ECM subject 54/007: Creditors - Payment Authorisations)

**r. 19**

Has the local government established and documented internal control procedures to enable identification of the nature and location of all investments and any related transactions?

**Response:** Yes

**Comments:** Control procedures are documented on CP31 – Investment of Funds and Process Map (DSID 2053388)

**r. 19C**

Has the local government ensured that all investments made under section 6.14(1) comply with statutory restrictions set out in Financial Management Reg. 19C?

**Response:** Yes

**Comments:** Refer CP31 – Investment of Funds policy

## *Local Government (Functions and General) Regulations 1996*

**r. 7**

No response required. This is covered by s3.59(2).

**r. 9**

No response required. This is covered by s3.59(2).

**r. 10**

No response required. This is covered by s3.59(2).

**r. 11A**

Did the local government comply with its current purchasing policy, adopted under the Local Government (Functions and General) Regulations 1996, regulations 11A(1) and (3) in relation to the supply of goods or services where the consideration under the contract was, or was expected to be, $250,000 or less or worth $250,000 or less?

**Response:** Yes

**Comments:** Refer CP 29 – Purchasing Policy and ECM subject 135/2025: Quotations

**r. 11**

No response required. This is covered by s3.57.

**r. 12**

Did the local government consider the implications of Local Government (Functions and General) Regulations 1996, Regulation 12 when deciding to enter into multiple contracts rather than a single contract?

**Response:** N/A

**r. 14(1), (3) and (5)**

If the local government sought to vary the information supplied to tenderers, was every reasonable step taken to give each person who sought copies of the tender documents, or each acceptable tenderer notice of the variation?

**Response:** Yes

**Comments:** Addenda to the Request for Tender were issued via both eTenderBox and the WALGA portal. All registered and invited respondents were automatically notified.

Signed addenda were retained and recorded in ECM.

**r. 15**

Did the local government's procedure for receiving and opening tenders comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 15 and 16?

**Response:** Yes

**Comments:** All tenders were advertised for a minimum of 14 working days (excluding public holidays) in accordance with Regulation 15.

All tenders were opened in accordance with Regulation 16.

Refer to the 2025 Tender Register (Ref: 5947639).

**r. 16**

No response required. This is covered by r. 15.

**r. 17**

Did the information recorded in the local government's tender register comply with the requirements of the Local Government (Functions and General) Regulations 1996, Regulation 17 and did the CEO make the tenders register available for public inspection and publish it on the local government's official website?

**Response:** Yes

**Comments:** Refer to the 2025 Tender Register (Ref: 5947639).

**r. 18(1) and (4)**

Did the local government reject any tenders that were not submitted at the place, and within the time, specified in the invitation to tender?

**Response:** Yes

**Comments:** Tenders not submitted at the place, or within the time specified in the invitation to tender, were considered and rejected in accordance with Regulation 18(1).

Were all tenders that were not rejected assessed by the local government via a written evaluation of the extent to which each tender satisfies the criteria for deciding which tender to accept?

**Response:** Yes

**Comments:** All tenders that were not rejected were assessed through a documented written evaluation against the prescribed criteria, in accordance with Regulation 18(4).

Refer to ECM subject: Tenders 114/2025.

**r. 19**

Did the CEO give each tenderer written notice containing particulars of the successful tender or advising that no tender was accepted?

**Response:** Yes

**Comments:** Refer to ECM subject: Tenders 114/2025.

**r. 21**

Does the local government's advertising and expression of interest processes for limiting who can tender comply with the requirements of the Local Government (Functions and General) Regulations 1996, Regulations 21 and 22?

**Response:** Yes

**Comments:** Refer to ECM subject: Expression of Interest 185/2025.

**r. 22**

No response required. This is covered by r. 21.

**r. 23**

Did the local government reject any expressions of interest that were not submitted at the place, and within the time, specified in the notice or that failed to comply with any other requirement specified in the notice?

**Response:** No

**Comments:** "No non-conforming EOIs were received Refer to ECM subject: Expression of Interest 185/2025.

Were all expressions of interest that were not rejected under the Local Government (Functions and General) Regulations 1996, Regulation 23(1) & (2) assessed by the local government? Did the CEO list each person as an acceptable tenderer?

**Response:** Yes

**r. 24**

Did the CEO give each person who submitted an expression of interest a notice in writing of the outcome in accordance with Local Government (Functions and General) Regulations 1996, Regulation 24?

**Response:** Yes

**r. 24AD(2), (4) and (6)**

Did the local government invite applicants for a panel of pre-qualified suppliers via Statewide public notice in accordance with Local Government (Functions & General) Regulations 1996 regulations 24AD(4) and 24AE?

**Response:** N/A

If the local government sought to vary the information supplied to the panel, was every reasonable step taken to give each person who sought detailed information about the proposed panel or each person who submitted an application notice of the variation?

**Response:** N/A

**r. 24AE**

No response required. This is covered by r. 24AD(2), (4) and (6).

**r. 24AF**

No response required. This is covered by r. 24AD(2), (4) and (6).

**r. 24AG**

Did the information recorded in the local government's tender register about panels of pre-qualified suppliers comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 24AG?

**Response:** N/A

**r. 24AH(1) and (3)**

Did the local government reject any applications to join a panel of prequalified suppliers that were not submitted at the place, and within the time, specified in the invitation for applications?

**Response:** N/A

Were all applications that were not rejected assessed by the local government via a written evaluation of the extent to which each application satisfies the criteria for deciding which application to accept?

**Response:** N/A

**r. 24AI**

Did the CEO send each applicant written notice advising them of the outcome of their application?

**Response:** N/A

**r. 24E**

Where the local government gave regional price preference, did the local government comply with the requirements of Local Government (Functions and General) Regulations 1996, Regulation 24E and 24F?

**Response:** N/A

**r. 24F**

No response required. This is covered by r. 24E.

I certify this is a true and accurate copy of the 2025 Compliance Audit Return, as adopted by Council at the meeting of ____________________________ 2026.

CEO | Date

Mayor or President | Date

# 12.2 2026-27 Consolidated Assurance Map

| | | |
|---|---|---|
| Voting Requirement | : | Simple Majority |
| Subject Index | : | 19/003 |
| Location/Property Index | : | N/A |
| Application Index | : | N/A |
| Disclosure of any Interest | : | Nil |
| Previous Items | : | Item 12.4 OCM 26 August 2025 |
| Applicant | : | N/A |
| Owner | : | N/A |
| Responsible Division | : | Executive Services |

## Council role

| | |
|---|---|
| **Overseeing** | Overseeing the allocation of the City's finances and resources e.g. setting the annual budget, accepting tenders, determining what services and facilities the City is to provide, annual reports, selecting the CEO and reviewing the CEO's performance. |

## Purpose of report

To submit the 2026-27 Consolidated Assurance Map to the Audit, Risk and Improvement Committee for endorsement and recommendation to Council. Refer Confidential Attachment 12.2.1.

## Summary and key issues

A consolidated assurance map is submitted to the Audit, Risk and Improvement Committee and Council annually.

The Institute of Internal Auditors defined an assurance map as "a high level document that identifies the holistic risk coverage across the organisation by a range of assurance providers. It helps to identify gaps and duplication of assurance coverage."

**Note:**

**The Presiding Member advised that in accordance with Section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*, the Committee will need to go behind closed doors if there are any questions on Confidential Attachment for this item.**

**There were no questions on the Confidential Attachment.**

| **Officer Recommendation** |
| --- |
| **Ms Zulsdorf moved, Harris seconded** |
| That the Audit, Risk and Improvement Committee recommends the 2026–27 Consolidated Assurance Map at Confidential Attachment 12.2.1, be endorsed by Council. |
| **Carried Unanimously 7 votes to 0** |
| For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan |
| Against: Nil |

## Location

Not applicable.

## Consultation

Assurance providers have advised timing of assurance activities.

## Strategic Community Plan implications

In accordance with the 2024–2034 Strategic Community Plan:

**Key Performance Area: Performance**
**Outcome:** 10. Effective leadership, governance and financial management.

## Policy implications

There are no policy implications associated with this report.

## Statutory environment

Section 7.2 of the *Local Government Act 1995 (WA)* requires annual financial audits.

Regulation 14 of the *Local Government (Audit) Regulations 1996* requires that a compliance audit for the period 1 January to 31 December is completed each year in a form approved by the Minister.

Regulation 17 of the *Local Government (Audit) Regulations 1996* states the following:

17. CEO to review certain systems and procedures

(1) The CEO is to review the appropriateness and effectiveness of a local government's systems and procedures in relation to —

  (a) risk management; and

  (b) internal control; and

  (c) legislative compliance.

(2) The review may relate to any or all of the matters referred to in sub regulation (1)(a), (b) and (c), but each of those matters is to be the subject of a review not less than once in every 3 financial years.

(3) The CEO is to report to the audit committee the results of that review.

Regulation 5(2) of the *Local Government (Financial Management) Regulations 1996* states the following:

(2) The CEO is to:

  (a) ensure that the resources of the local government are effectively and efficiently managed; and

  (b) assist the council to undertake reviews of fees and charges regularly (and not less than once in every financial year); and

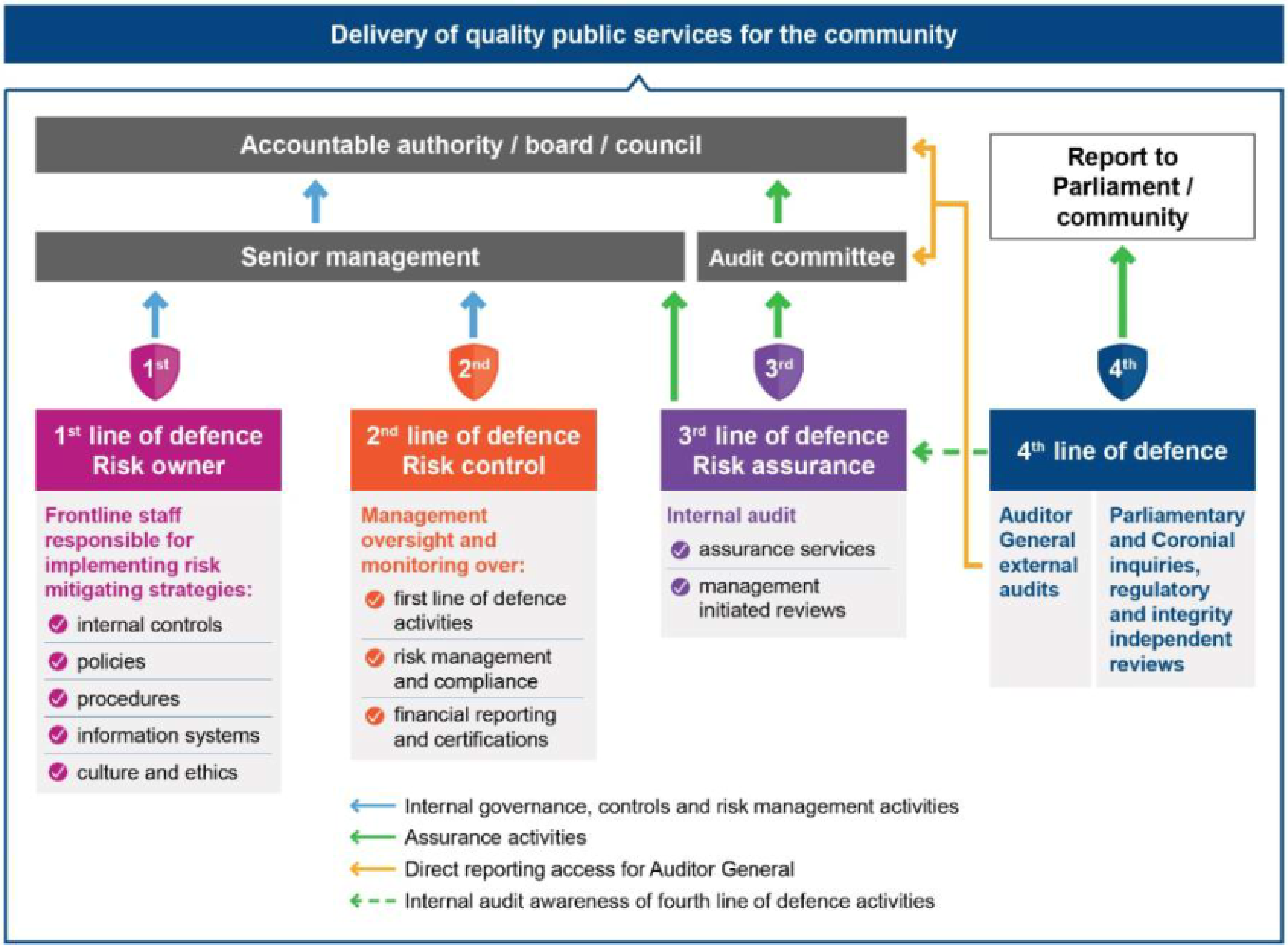
  (c) undertake reviews of the appropriateness and effectiveness of the financial management systems and procedures of the local government regularly (and not less than once in every 3 financial years) and report to the local government the results of those reviews.

In addition, under the International Standard ISO 9001:2015, Quality Management Systems, the City is required to conduct an annual program of internal and external audits to maintain certification of ISO Standards.

## Background

The 2026–27 Consolidated Assurance Map (refer Confidential Attachment 12.2.1) provides an overview of the audits and reviews planned for financial year 2026-27 and is presented to the Audit, Risk and Improvement Committee for endorsement and recommendation to Council.

Referencing in the Consolidated Assurance Map reflects the WA Public Sector Audit Committees – Better Practice Guide, issued by the Office of the Auditor General (25 June 2020) "Lines of Defence Model" as shown in Figure 1 below.




Source: OAG

## Report

The 2026–27 Consolidated Assurance Map gives Council oversight of the scope and focus of assurance activities for financial year 2026–27.

Assurance drivers are requirements for:

- Internal control and legislative compliance.
- Statutory external audit requirements.

- External certifications of Quality, Environmental and Occupational Health & Safety management systems.
- The need to support the City's chosen governance approach.
- The requirement to provide a comprehensive solution that can be undertaken with existing resources.

There are a number of focus audits that any area of the City could be subject to each year. These could be conducted as internal audits or reviews, operational comparison reports, or by external third parties, the Department of Local Government, Sport and Culture Industries, the Corruption and Crime Commission, Public Sector Commission or the Western Australian Office of the Auditor General. As these audits are carried out as required, they are not identified on the Consolidated Assurance Map.

## Financial implications

There are no financial implications evident at this time.

## Environmental implications

There are no environmental implications associated with this report.

## Social implications

There are no social implications associated with this report.

## Attachment details

| Attachment No and title |
| --- |
| 1. CONFIDENTIAL REDACTED - 2026-27 Consolidated Assurance Map (Confidential Matter in accordance with the Local Government Act 1995 (WA) Section 5.23(4)(e)(f)) [**12.2.1** - 1 page] |

# 12.3 Internal Audit Plan 2026-27 – 2028-29

| | | |
|---|---|---|
| Voting Requirement | : | Simple Majority |
| Subject Index | : | 19/003 Audit, Risk and Improvement Committee |
| Location/Property Index | : | N/A |
| Application Index | : | N/A |
| Disclosure of any Interest | : | Nil |
| Previous Items | : | Item 11.2 OCM 16 December 2025 |
| Applicant | : | N/A |
| Owner | : | N/A |
| Responsible Division | : | Executive Services |

## Council role

| | |
|---|---|
| **Overseeing** | Overseeing the allocation of the City's finances and resources e.g. setting the annual budget, accepting tenders, determining what services and facilities the City is to provide, annual reports, selecting the CEO and reviewing the CEO's performance. |

## Purpose of report

To submit the draft three year forward "Internal Audit Plan 2026-2027 – 2028-29" to the Audit, Risk and Improvement Committee for review and recommendation to Council.

## Summary and key issues

The "Terms of Reference – Internal Audit" requires the internal audit activity present "annual and longer term risk based internal audit plans" to the committee for review prior to recommendation to Council.

The plan at Confidential Attachment 12.3.1, records:

- Audits planned and completed this financial year (2026-27) to date.
- Audits planned for the future financial years 2027-28 – 2028-29.

For historical information the plan also records 2022-23, 2023-24, 2024-25 and 2025-26 audits planned and completed.

**Note:**

**The Presiding Member advised that in accordance with Section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*, the Committee will need to go behind closed doors if there are any questions on Confidential Attachment for this item.**

**6:47pm Rossi moved, Harris seconded that in accordance with Section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*, the meeting will proceed behind closed to allow questions on the Confidential Attachment for Item 12.3.**

**Carried Unanimously 7 votes to 0**

For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan

Against: Nil

**6:54pm The meeting came out from behind closed doors. No members of the public returned to the meeting.**

Consistent with section 5.23(8) of the *Local Government Act 1995 (WA)*, the following is provided regarding the decision to go behind closed doors.

**(a) the decision**

The decision to go behind closed doors is included at page 70 of these minutes.

**(b) the subsection under which the decision is made and, if that subsection is subsection (2) or (4), the paragraph of that subsection under which the decision is made**

The decision to go behind closed doors was made pursuant to section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*.

**(c) if the provision recorded under paragraph (b) is subsection (2)(c) or (4)(g) — the applicable regulation (including any applicable subregulation or paragraph)**

Not applicable.

**(d) if the provision recorded under paragraph (b) is subsection (2)(d) or (4)(h) — a statement that a direction was given under section 5.23AA(1) or (2) (as the case requires)**

Not applicable.

**(e) an explanation of how the matter or information to which the decision relates falls within the scope of the provision recorded under paragraph (b)**

The information contained in the confidential attachment, and the questions relating to the confidential attachment from Committee Members related to information that if made public would be likely to endanger the security of the City's properties and operations, and impair the effectiveness of any lawful method or procedure for preventing, detecting, investigating or dealing with any contravention or possible contravention of the law.

**(f) a summary of the steps taken to ensure that the closure to members of the public is for no longer than required or authorised under the provision recorded under paragraph (b)**

The Committee only discussed item 12.3 behind closed doors. As soon as questions were asked and answered, the Committee immediately moved a procedural motion to reopen the meeting to the public.

**(g) any prescribed information**

There is no prescribed information contained in the *Local Government (Administration) Regulations 1996 (WA)* relevant to this section.

**Officer Recommendation**

**Kulczycki moved, Harris seconded**

That the Audit, Risk and Improvement Committee recommends the draft three year forward "Internal Audit Plan 2026-27 – 2028-29", as Confidential Attachment 12.3.1, be endorsed by Council.

**Carried Unanimously 7 votes to 0**

For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan

Against: Nil

## Location

Not applicable.

## Consultation

The development of the "Internal Audit Plan 2026-2027 – 2028-2029" was reviewed by:

- All Department Managers.
- All Division Directors.
- The CEO.
- Executive Leadership Team.

Comments provided have been considered and incorporated in the draft plan.

## Strategic Community Plan implications

In accordance with the 2024–2034 Strategic Community Plan:

**Key Performance Area: Performance**

**Outcome:** 10. Effective leadership, governance and financial management.

## Policy implications

There are no policy implications associated with this report.

## Statutory environment

***Local Government Act 1995 (WA)***

7.1A. Audit committee

(1) A local government is to establish an audit committee of 3 or more persons to exercise the powers and discharge the duties conferred on it.

***Local Government (Audit) Regulations 1996 (WA)***

16. Functions of audit committee

An audit committee has the following functions —

(a) to guide and assist the local government in carrying out —

  (i) its functions under Part 6 of the Act; and

  (ii) its functions relating to other audits and other matters related to financial management.

(b) to guide and assist the local government in carrying out the local government's functions in relation to audits conducted under Part 7 of the Act;

(c) to review a report given to it by the CEO under regulation 17(3) (the CEO's report) and is to —

   (i) report to the council the results of that review; and

   (ii) give a copy of the CEO's report to the council.

(d) to monitor and advise the CEO when the CEO is carrying out functions in relation to a review under —

   (i) regulation 17(1); and

   (ii) the Local Government (Financial Management) Regulations 1996 regulation 5(2)(c);

(e) to support the auditor of the local government to conduct an audit and carry out the auditor's other duties under the Act in respect of the local government;

(f) to oversee the implementation of any action that the local government —

   (i) is required to take by section 7.12A(3); and

   (ii) has stated it has taken or intends to take in a report prepared under section 7.12A(4)(a); and

   (iii) has accepted should be taken following receipt of a report of a review conducted under regulation 17(1); and

   (iv) has accepted should be taken following receipt of a report of a review conducted under the Local Government (Financial Management) Regulations 1996 regulation 5(2)(c);

(g) to perform any other function conferred on the audit committee by these regulations or another written law.

## Background

The City of Belmont's internal audit activity commenced in June 2021 and the first internal audit plan was endorsed by the committee in August 2022.

This is the fifth internal audit plan submitted to the committee and covers the three year forward period 2026-27 – 2028-29.

**Internal Audit Plan - Methodology**

The draft internal audit plan was developed using the following steps:

- Status of the 2025-26 internal audit plan.
- Meeting with Department Managers to identify their operations, key objectives, key risks, new developments and related City strategies.
- Meeting with Division Directors and the CEO to identify need for additional audits.

The Institute of Internal Auditors (IIA) Supplementary Guidance paper "Developing a Risk Based Internal Audit Plan" was also used as a reference to develop the draft plan.

When each audit is commenced a detailed engagement plan is completed and discussed with management to ensure areas of current risk are identified.

## Report

The attached three year forward "Internal Audit Plan 2026-2027 – 2028-29" provides an outline for the two internal audit staff to review the city's activities using a risk-based approach.

## Financial implications

There are no financial implications evident at this time.

## Environmental implications

There are no environmental implications associated with this report.

## Social implications

There are no social implications associated with this report.

## Attachment details

| Attachment No and title |
|---|
| 1. CONFIDENTIAL REDACTED - Three Year Internal Audit Plan 2026-27 - 2028-29 (Confidential Matter in accordance with the Local Government Act 1995 (WA) Section 5.23(4)(e)(f)) [**12.3.1** - 2 pages] |

# 12.4 Internal Audit Report 2026

| | | |
|---|---|---|
| Voting Requirement | : | Simple Majority |
| Subject Index | : | 19/006 |
| Location/Property Index | : | N/A |
| Application Index | : | N/A |
| Disclosure of any Interest | : | Nil |
| Previous Items | : | N/A |
| Applicant | : | N/A |
| Owner | : | N/A |
| Responsible Division | : | Executive Services |

## Council role

**Overseeing** Overseeing the allocation of the City's finances and resources e.g. setting the annual budget, accepting tenders, determining what services and facilities the City is to provide, annual reports, selecting the CEO and reviewing the CEO's performance.

## Purpose of report

To submit three completed internal audit reports to the Audit, Risk and Improvement Committee. These audits have been completed in accordance with the Council approved 2025-26 internal audit plan.

## Summary and key issues

Findings for the completed audits are detailed below.

**Infrastructure Services Division – Asset Management Roads and Drains (report issued 29 January 2026)**

Good practices observed:

- Processes in place to measure and monitor road and drainage conditions to prioritise future works.
- Finance Asset Register is reconciled bi-annually to asset information systems maintained specifically for roads and drains.
- Engaged a consultant to undertake asset management maturity assessments across the City's asset portfolio.

- Developed a four-year drainage inspection program covering 2025-2029 calendar years.
- Annual road visual condition inspection process in place that is well coordinated and delivered through a multidisciplinary team.

Findings:

- Four Business Management System (BMS) documents have not been reviewed and updated within the last three years.
- Stormwater drainage inspection process is not documented.

**Corporate and Governance Division – Review of Late Purchase Orders (report issued 6 May 2026)**

Good practices observed:

- Monthly procurement and contract management reporting in place.
- City's Purchasing Policy is comprehensive and aligned with legislative requirements.
- Procurement & Contracts officers demonstrated active engagement in monitoring policy compliance, validating data, and supporting business units to improve purchase order practices.

Findings:

- Procurement and Contract Management Report only show the total number of purchase orders raised after invoice date. Since this data is not reported on a month-by-month basis, it does not result in compliance improvement due to the non-visibility of trends within Business Units.
- Internal Audit identified recurring instances across multiple business areas where invoices:
  - Were submitted without referencing a Purchase Order (PO) number; or
  - Included PO numbers that were incorrect or related to different commitments.
- City Facilities & Property Department uses 'My Buildings' software to raise work orders. This process is not a substitute for raising POs. From the 712 late POs identified within scope, 186 (26%) relate to maintenance of the City facilities.

**Executive Services Division – Payroll System Reliability (report issued 25 June 2026)**

Good practices observed:

- Appropriate set up of payroll user permissions within the Aurion Payroll System.
- Appropriate segregation of duties in place within People and Culture and Finance business units.
- Master File Change Report reports key changes to the Payroll System during the fortnightly pay period and requires review and sign off prior to payroll processing.
- Payroll procedures manual in place.
- Payroll System user access controls are subject to independent review.
- No unauthorised or incorrect payments detected during audit sampling.

Findings:

- Pay Run Checklist not formally signed off by two payroll officers prior to payroll processing.
- No Reference Sheet clearly defining the remarks generated on the Master File Change Report.
- Changes to scope of the Master File Change Report is not subject to an independent review.
- No Pay Certification Reports in place.
- Payroll controls not documented as a separate Work Instruction.
- Improved documentation required for reconciliation between Trial Pay Report and Final Pay Run Report.

**Note:**

**The Presiding Member advised that in accordance with Section 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*, the Committee will need to go behind closed doors if there are any questions on Confidential Attachments for this item.**

**6:55pm Rossi moved, Harris seconded that in accordance with Section 5.23(4)(e)(f) of the *Local Government Act 1995 (WA)*, the meeting will proceed behind closed to allow questions on the Confidential Attachments for Item 12.4.**

**Carried Unanimously 7 votes to 0**

For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan

Against: Nil

**7:15pm The meeting came out from behind closed doors. No members of the public returned to the meeting.**

Consistent with section 5.23(8) of the *Local Government Act 1995 (WA)*, the following is provided regarding the decision to go behind closed doors.

**(a) the decision**

The decision to go behind closed doors is included at pages 77-78 of these minutes.

**(b) the subsection under which the decision is made and, if that subsection is subsection (2) or (4), the paragraph of that subsection under which the decision is made**

The decision to go behind closed doors was made pursuant to 5.23(4)(e) and (f) of the *Local Government Act 1995 (WA)*.

**(c) if the provision recorded under paragraph (b) is subsection (2)(c) or (4)(g) — the applicable regulation (including any applicable subregulation or paragraph)**

Not applicable.

**(d) if the provision recorded under paragraph (b) is subsection (2)(d) or (4)(h) — a statement that a direction was given under section 5.23AA(1) or (2) (as the case requires)**

Not applicable.

**(e) an explanation of how the matter or information to which the decision relates falls within the scope of the provision recorded under paragraph (b)**

The information contained in the confidential attachment, and the questions relating to the confidential attachment from Committee Members related to information that if made public would be likely to endanger the security of the City's properties and operations, and impair the effectiveness of any lawful method or procedure for preventing, detecting, investigating or dealing with any contravention or possible contravention of the law.

**(f) a summary of the steps taken to ensure that the closure to members of the public is for no longer than required or authorised under the provision recorded under paragraph (b)**

The Committee only discussed item 12.4 behind closed doors. As soon as questions were asked and answered, the Committee immediately moved a procedural motion to reopen the meeting to the public.

**(g) any prescribed information**

There is no prescribed information contained in the *Local Government (Administration) Regulations 1996 (WA)* relevant to this section.

| Officer Recommendation |
|---|
| **Ms Zulsdorf moved, Davis seconded**<br><br>That the Audit, Risk and Improvement Committee accepts the three internal audit reports from the Senior Internal Auditor (Confidential Attachments 12.4.1, 12.4.2 and 12.4.3) and recommends that Council:<br>1. Receives the report (Confidential Attachment 12.4.1) titled Internal Audit – Asset Management Roads and Drains.<br>2. Receives the report (Confidential Attachment 12.4.2) titled Internal Audit – Review of Late Purchase Orders.<br>3. Receives the report (Confidential Attachment 12.4.3) titled Internal Audit – Payroll System Reliability.<br>4. Notes the City of Belmont management comments in Confidential Attachments 12.4.1, 12.4.2 and 12.4.3 and actions to be undertaken in response to the internal audit recommendations.<br><br>**Carried Unanimously 7 votes to 0**<br><br>For: Davis, Harris, Kulczycki, Mr Seth, Ms Zulsdorf, Rossi and Ryan<br><br>Against: Nil |

## Location

Not applicable.

## Consultation

All draft internal audit reports were reviewed by relevant staff, Managers, Directors and the CEO before being issued for action.

## Strategic Community Plan implications

In accordance with the 2024–2034 Strategic Community Plan:

**Key Performance Area: Performance**

**Outcome:** 10. Effective leadership, governance and financial management.

## Policy implications

There are no policy implications associated with this report.

## Statutory environment

***Local Government Act 1995 (WA)***

7.1A. Audit committee

(1) A local government is to establish an audit committee of 3 or more persons to exercise the powers and discharge the duties conferred on it.

***Local Government (Audit) Regulations 1996 (WA)***

16. Functions of audit committee

An audit committee has the following functions —

(a) to guide and assist the local government in carrying out —

  (i) its functions under Part 6 of the Act; and

  (ii) its functions relating to other audits and other matters related to financial management.

(b) to guide and assist the local government in carrying out the local government's functions in relation to audits conducted under Part 7 of the Act;

(c) to review a report given to it by the CEO under regulation 17(3) (the CEO's report) and is to —

  (i) report to the council the results of that review; and

  (ii) give a copy of the CEO's report to the council.

(d) to monitor and advise the CEO when the CEO is carrying out functions in relation to a review under —

  (i) regulation 17(1); and

(ii) the Local Government (Financial Management) Regulations 1996 regulation 5(2)(c);

(e) to support the auditor of the local government to conduct an audit and carry out the auditor's other duties under the Act in respect of the local government;

(f) to oversee the implementation of any action that the local government —

(i) is required to take by section 7.12A(3); and

(ii) has stated it has taken or intends to take in a report prepared under section 7.12A(4)(a); and

(iii) has accepted should be taken following receipt of a report of a review conducted under regulation 17(1); and

(iv) has accepted should be taken following receipt of a report of a review conducted under the Local Government (Financial Management) Regulations 1996 regulation 5(2)(c);

(g) to perform any other function conferred on the audit committee by these regulations or another written law.

17. CEO to review certain systems and procedures

(1) The CEO is to review the appropriateness and effectiveness of a local government's systems and procedures in relation to —

(a) risk management; and

(b) internal control; and

(c) legislative compliance.

(2) The review may relate to any or all of the matters referred to in sub regulation (1)(a), (b) and (c), but each of those matters is to be the subject of a review not less than once in every 3 financial years.

(3) The CEO is to report to the audit committee the results of that review.

***Local Government (Financial Management) Regulations 1996 (WA)***

(2) CEO's duties as to financial management

(c) undertake reviews of the appropriateness and effectiveness of the financial management systems and procedures of the local government regularly (and not less than once in every 3 financial years) and report to the local government the results of those reviews.

## Background

The internal audit function operates in accordance with Council approved Terms of reference (TOR) and Council approved annual internal audit plans.

The TOR requires the Senior Internal Auditor to be functionally accountable to the CEO and Council via the Audit, Risk and Improvement Committee.

The TOR also requires final engagement audit reports to be issued to the CEO and Council via the Audit, Risk and Improvement Committee.

## Report

**Infrastructure Services Division – Asset Management Roads and Drains (report issued 29 January 2026)**

Findings and Management Responses

- Design Assets and Development is responsible for the management of 36 Business Management Systems (BMSs) comprising of 9 process maps and 27 work instructions.
- From the BMSs reviewed within scope, Internal Audit noted four documents that have not been reviewed within the last three years.
    - Management has agreed to review and update the following Business Management System (BMS) documents:
        - Roads Program (Work Instruction).
        - Capital Works Program for Roads, Drains and Paths (Process Map).
        - Design Control - Roads and Drainage Design (Work Instruction).
        - Drainage Asset Data (Work Instruction).
- Stormwater drainage inspection process is not documented.
    - Management has agreed to develop and document a standardised inspection process supported by a process map and/or work instruction. Internal Audit confirms that processes are in place to ensure key stakeholders are always reminded of when BMSs are next due for review.

**Corporate and Governance Division – Review of Late Purchase Orders (report issued 6 May 2026)**

Findings and Management Responses

- Procurement and Contract Management Report only show the total number of purchase orders raised after invoice date. Since this data is not reported on a month-by-month basis, it does not result in compliance improvement due to the non-visibility of trends within Business Units.

  - Management has agreed to report Late POs based on statistical data on a month-by-month basis.
  - It should be noted that under the City's Purchasing Policy CP29, a purchase order is not required for the provision of goods and services if a blanket order is in place or if listed as a purchasing exemption under clause 6 of CP29.
- Internal Audit identified recurring instances across multiple business areas where invoices:
  - Were submitted without referencing a Purchase Order (PO) number; or
  - Included PO numbers that were incorrect or related to different commitments.
  - Management has agreed to:
    - Highlight such non-compliances in their next Monthly Procurement and Contract Management Report.
    - Publish this finding on the intranet (i.e. BelNet). This publication will include the fact that additional audit sampling will be performed by Internal Audit in 2026-27.
- City Facilities & Property Department uses 'My Buildings' software to raise work orders. This process is not a substitute for raising POs. From the 712 late POs (i.e. 11.8% of total POs) identified within scope, 186 (26%) relate to maintenance of the City facilities.
  - Management has agreed to:
    - Generate PO in CiA prior to work order being released.
    - Reference all POs in 'My Buildings'.
    - Reconcile work orders to Pos at month end.
    - Update building maintenance process map to reflect the above three points.

**Executive Services Division – Payroll System Reliability (report issued 25 June 2026)**

Findings and Management Responses

- Pay Run Checklist not formally signed off by two payroll officers prior to payroll processing.
- No Reference Sheet clearly defining the remarks generated on the Master File Change Report.

        - Management has agreed:
            - The Pay Run Checklist will now also be signed off by the HR and Payroll Systems Administrator.
            - A Reference Sheet will be introduced.
- Changes to scope of the Master File Change Report is not subject to an independent review.
    - Management has agreed to introduce unscheduled quarterly reviews.
- No Pay Certification Reports in place.
    - Management has agreed to introduce fortnightly Pay Certification Reports (i.e. The Aurion Payroll Pay Summary Report).
- Payroll controls not documented as a separate Work Instruction.
    - Management has agreed to prepare a document covering the following key internal controls:
        - Segregation of duties.
        - Management of payroll exception reporting and sign off.
        - Control and independent review of user access.
        - Security of the Payroll Payment File.
        - Pay Certification Reports.
- Improved documentation required for reconciliation between Trial Pay Report and Final Pay Run Report.
    - Management has agreed to prepare the reconciliation on a separate document, listing each final update made (i.e. to improve clarity and transparency), for each pay run and attach to the Master File Change Report.

## Financial implications

There are no financial implications evident at this time.

## Environmental implications

There are no environmental implications associated with this report.

## Social implications

There are no social implications associated with this report.

## Attachment details

| Attachment No and title |
| --- |
| 1. CONFIDENTIAL REDACTED - Internal Audit - Audit Report (Asset Management Roads and Drains) (Confidential Matter in accordance with the Local Government Act 1995 (WA) Section 5.23(4)(e)(f)) [**12.4.1** - 10 pages] |
| 2. CONFIDENTIAL REDACTED - Internal Audit - Audit Report (Review of Late Purchase Orders) (Confidential Matter in accordance with the Local Government Act 1995 (WA) Section 5.23(4)(e)(f)) [**12.4.2** - 13 pages] |
| 3. CONFIDENTIAL REDACTED - Internal Audit - Audit Report (Payroll System Reliability) (Confidential Matter in accordance with the Local Government Act 1995 (WA) Section 5.23(4)(e)(f)) [**12.4.3** - 13 pages] |

# 13 Next Meeting

The next meeting of the Audit, Risk and Improvement Committee will be held on Monday, 23 November 2026 commencing at 6:30pm.

# 14 Closure

**There being no further business, the Presiding Member thanked everyone for their attendance and closed the meeting at 7:17pm.**