

# INDEPENDENT ENVIRONMENTAL AUDIT

# FINAL REPORT

Proponent:	Sydney Metro
Project:	City & South West, Chatswood to Sydenham
Scope:	Business Management Plan
Process:	Community Communications Strategy
Auditee:	Sydney Metro Project Communications

Audit Organisation:	QEM Consulting Pty Ltd
Auditor:	Larry Weiss
Registration	Exemplar Global EMS Auditor Accreditation no. 12355
Audit References:	QEM 1803-A12
	SM18.19-072-SCL-IEA
Audit date:	5 <sup>th</sup> February 2019
Report date:	25 <sup>th</sup> March 2019

## **EXECUTIVE SUMMARY**

An Independent Environment Audit was conducted on 5<sup>th</sup> February 2019 of Sydney Metro Project Communications to assess project-wide compliance with Planning & Assessment Approvals relating to management of businesses impacted by the City & Southwest (C&SW) Infrastructure Project. The audit assessed Sydney Metro information and records on the day, however business stakeholder records maintained by construction contractors were subsequently requested to verify interface management and information flows.

Overall, the audit confirmed that dedicated personnel were deployed to identify and manage business stakeholder needs relating to project impacts, this amongst other stakeholder engagement and communication activities.

In summary, two (2) non-compliances were raised in relation to the Planning Approval requirement for the implementation of a Small Business Owners Support Program, plus the maintenance of up-to-date Plans and Programs on project websites. The latter was addressed and closed prior to issue of this final audit report. Whilst other areas of focus were assessed as being compliant, 4 observations and 3 improvement opportunities were raised for actioning.

Regarding the Small Business Owners Support Program (SBOSP) it was noted that an internal non-compliance report pertaining to the non-establishment of a Retail Advisory Support Panel was being progressed, with panel members appointed subsequent to the office assessment component of this independent audit. Information regarding a number of adversely affected small businesses was recorded in the Consultation Manager Database, routine meeting minutes and emails, however there was no formal process to report and communicate this information further to trigger SBOSP consideration, assistance and support. Amelioration actions by contractors were noted, however these were ad hoc, non-systemised and not registered or reported as such.

Weaknesses in small business profiling surveys were also observed. These included missing information such as main delivery times, reliance on foot traffic and signage or advertising that may be impacted.

Otherwise, compliance was noted in the implementation of other components of management plans, as well as standardisation and improvement of performance measurement. Consultation and engagement with business / community was being undertaken in a variety of fit-for-purpose ways, this together with community personnel on the ground appearing to be a project strength.

## **Report Author (& Auditor)**:

LJ Weiss

Larry Weiss

## **1.0 AUDIT DETAILS**

## 1.1 Purpose

The purpose of this Independent Environmental Audit was to assess Sydney Metro implementation and/or oversight of the management of businesses impacted by the City & Southwest (C&SW) Infrastructure Project with respect to compliance with relevant Planning & Assessment Approvals.

## **1.2 Context**

Planning Approvals issued by the Department of Planning & Environment require Sydney Metro (formerly Transport for NSW) to develop an Environmental Audit Program for independent annual environmental auditing against the terms of the C&SW Critical State Significant Infrastructure (CSSI) Project Approvals.

QEM Consulting Pty Ltd have been engaged by Sydney Metro Delivery Office (SMDO) Safety, Sustainability & Environment (SSE) to deliver a program of Independent Environmental Audits. As required by C&SW Planning Approval CSSI 15\_7400 (A39) and the associated Environmental Audit Program, an Independent Environmental Audit was undertaken to assess Sydney Metro compliance with Planning Approval requirements relating to the management of business impacts.

As context, Sydney Metro Project Communications are responsible for the implementation of the project Community Communications Strategy including consultation and engagement with identified stakeholders including businesses impacted by the project. At a construction and/or site level applicable Planning Approvals including development and implementation of site-specific Business Management Plans have been contractually assigned to Principal Contractors. Sydney Metro have retained Small Business Owners Support Program obligations however.

## **1.3 Audit Objectives, Criteria & Scope**

The Audit Objective was to assess compliance with relevant Planning Approvals pertaining to business consultation and Business Management Plan implementation. The audit focussed on implementation of strategies, forums and programs to minimise construction related business impacts, plus monitoring and reporting of performance and effectiveness thereof.

Audit criteria included Sydney Metro C&SW Construction Environmental Management Framework s4.5 requirements, plus:

City & Southwest Project Environmental Planning Approval CSSI 15\_7400:

- Business Management Plan Condition E64
- Community Consultation and Communication Conditions B2 (a), (b), (f) & (g) and B15.

Revised Environmental Mitigation Measures:

• Business Impact BI's 1, 2 & 3.

The Audit Scope included Sydney Metro retained Planning Approval commitments plus Business Management Plan implementation and/or oversight of Principal Contractor implementation thereof.

### 1.4 Audit Process and Methodology

The audit comprised an off-site desktop review, a proponent audit and a post audit assessment of documentation and records. The audit process including scoping and planning was undertaken in accordance with the principals of AS / NZS / ISO 19011:2018 – Guidelines for Auditing Management Systems.

Further details on Auditor credentials, independence and disclaimer can be found in Appendix 2 to this report.

## **1.5 Auditees and Participation**

Key Auditees included:

Name	Organisation	Position / Role
Rebecca Raap	Sydney Metro	Senior Manager, Project Communications

## **1.6 Audit Definitions & Abbreviations**

The following abbreviations and definitions apply throughout this report:

Item	Explanation				
BMP	Business Management Plan				
CCS	Community Communications Strategy				
CSMW	Central Station Main Works				
CEMF	Construction Environmental Management Framework				
MCoA	Minister's Conditions of Approval				
NCW	Northern Corridor Works				
RASP	Retail Advisory / Support Panel				
REMM	Revised Environmental Management Measure				
SBOSP	Small Business Owners Support Program				
TSE	Tunnels, Stations & Excavations				
Non-compliant					
Observation					
Improvement	Refer Section 2.1 overleaf				
Opportunity					
Compliant					
Notable Practice					

# 2.0 AUDIT FINDINGS

## 2.1 Audit Summary

This table provides a summary of compliance against audit criteria and area of focus, indicating the number of actions required:

		STATUS				
Focus Area	Key Criteria	Compliant			Non- Compliant	
		NP	10	OBS	NC	
Strategies & Plans	MCoA B1 & E64					
Business Consultation incl. impact identification	MCoA B2 a), f), g) REMM BI-2		2	2		
Business Management Plan (implementation)	MCoA E64 a)-c)					
Business Management Plan (Small Business Support Program)	MCoA E64 d)		1	1	1	
Monitoring, Review & Reporting	MCoA E64 e)			1		
Website documentation	MCoA B15				1	

### Audit Findings are classified as follows:

Status	Explanation
Notable Practice (NP)	<i>Outstanding positive observation about a system, process or practice, for recognition and/or sharing purposes.</i>
Improvement Opportunity (IO)	A suggestion or opportunity to implement a good or better practice to improve efficiency, further reduce exposure to risk or improve information management. When specifically stated as a Recommendation, this requires a formal response as to a considered action, alternative action or management decision in the negative.
Observation (OBS)	Documented requirement and/or implementation issue which may not strictly affect required performance or compliance outcomes. Also termed a non-conformance (as opposed to non-compliance) in the industry, observations could be an early indication of potential non-compliance and/or an adverse performance outcome.
Non-compliant (NC)	The intent of one or more specific requirements of a condition or obligation have not been met, based on insufficient objective evidence to demonstrate required outcomes or deliverables being achieved and/or complied with.

Note: The status of 'Compliant' is determined where sufficient verifiable evidence demonstrates that intent, specific requirements or elements of a condition / obligation have been met within the scope of the Independent Audit. Consequently, there may be no resulting actions, alternatively, actions commensurate with an Improvement or Observational status above will be required.

## 2.2 Detailed Findings and Action Plan

Ref	Audit Finding	Status	Priority	Action Plan
1.	Small Business Owners Support Program (SBOSP) implementation.	NC	HIGH	Sydney Metro Project Communications action(s):
	<ul> <li>Despite information on adversity being captured in meeting minutes, contractor reports and the Consultation Manager database, no small business has been "escalated" to the Small Business Owners Support Program. It was noted that at least one candidate demonstrated significantly reduced income. However, no Business Action Plan specified in section 4.2 of the SBODP document had been provided in the last 1½ years.</li> <li>(Refer to SB-3 and SB-4 in section 2.3 for more details).</li> <li>Additionally, other elements of the SBODP including the conduct of quarterly independent business surveys per</li> </ul>			<ul> <li>Noting that the new Retail Advisory / Support Panel is due to meet on 4 April 2019:</li> <li>a) Compile a list of small businesses identified during this audit and recorded in communication records as being adversely affected by the project AND table this list at the RASP meeting.</li> <li>b) Develop Business Action Plans based on RASP advice, as required by the SBOSP.</li> <li>c) Implement other components of the SBOSP including but not limited to independent business surveys.</li> </ul>
	section 6.0 had not been implemented. Note:			Responsible person(s): Rebecca Raap/Phillip Kelly
	<ol> <li>MCoA E64 d) of the City &amp; South West project Planning Approval CSSI 15_7400 requires the implementation of a Small Business Owners Support Program administered by a Retail Advisory / Support Panel (RASP).</li> <li>An internal Sydney Metro Non-Compliance Report dated 2018-11-22 regarding the non-fulfilment of the Retail Advisory / Support Panel obligation had been raised. This had been substantially progressed in 2019, details found in item SB-1 of section 2.3.</li> <li>The trigger for the commencement of the SBOSP supported by the RASP actually occurred on the 28 November 2017 upon endorsement of the SBOSP document by the Project Environmental Representative.</li> </ol>			<ul> <li>Rebecca Raap/Phillip Kelly</li> <li>Due date(s): <ul> <li>a) 1 April 2019</li> <li>b) 31 May 2019</li> <li>c) Ongoing, the Independent Business Survey target date to be provided on advice of the RASP.</li> </ul> </li> </ul>

Ref	Audit Finding	Status	Priority	Action Plan
2.	Documented Small Business Owners Support Program process	OBS	MEDIUM	Sydney Metro Project Communications action(s):
	<ul> <li>Business-related documentation was inconsistent in the initial step for escalating (registering) an adversely impacted small business owner for consideration and/or assistance through the Sydney Metro Small Business Owners Support Program.</li> <li>(Refer to SB-5 in section 2.3 for details).</li> <li>Business engagement and consultation meeting information recorded by Communications staff was quite variable in response to feedback on adverse impacts, the effects on business viability and the mechanisms of the Sydney Metro Small Business</li> </ul>			<ul> <li>Noting that the new Retail Advisory / Support Panel is due to meet on 4 April 2019:</li> <li>a) Solicit RASP input into a flow chart or similar mechanism and include this in the SBOSP document so as to articulate inputs, steps and interactions between various stakeholders.</li> <li>b) Ensure and demonstrate that contractors incorporate RASP recommendations into their Business Management Plans, including guidance on adversity and/or triggers for escalation or referral to the SBOSP.</li> <li>Responsible person(s):</li> </ul>
	Owners Support Program.			Rebecca Raap/Phillip Kelly <b>Due date(s):</b> a) 31 May 2019 b) 30 June 2019
3.	The CSMW Business Impact Risk Register appended to the Business Management Plan did not RATE <b>business</b> impacts to facilitate specific management arrangements and measures as required by Project Approval REMM BI 2. Furthermore it was noted that commitments around "negotiated agreements given proximity to central station and works" had not taken place, with LORA indicating on the day that this would be replaced by engagement / consultation.	OBS	MEDIUM	<ul> <li>Sydney Metro Project Communications action(s): <ul> <li>a) Feedback provided to CSMW contractor as part of their formal Business Management Plan review.</li> <li>b) Ensure and demonstrate that the CSMW contractor addresses absent business impacts ratings in their Central Station &amp; Central Walk Business Management Plan update.</li> </ul> </li> </ul>
				<b>Responsible person(s):</b> Rebecca Raap / Kristina Cimino
				Due date(s): a) 18 March 2019 (completed) b) 30 April 2019

Ref	Audit Finding	Status	Priority	Action Plan
4.	The Small Business Owners Support Panel Terms of Reference document <u>draft</u> revision 1.0 dated 20 December 2018 was not an approved and controlled document, with a different undated version embedded in the 7 March 2019 Retail Advisory / Support Panel Member Confirmation Letters. <i>It was noted that the minimum meeting frequency varied between the two documents from 6-monthly to quarterly.</i>	OFI	LOW	<ul> <li>Sydney Metro Project Communications action(s):</li> <li>As an incorrect version of the TOR was sent to prospective Retail Advisory / Support Panel Member panel members, <ul> <li>a) The Terms of Reference document will be updated, formatted in the official Sydney Metro template and version controlled.</li> <li>b) An updated Terms of Reference version will be issued to the appointed Retail Advisory / Support Panel members prior to the next meeting on 4 April 2019.</li> </ul> </li> <li>Responsible person(s): Rebecca Raap/Phillip Kelly</li> <li>Due date(s): <ul> <li>a) 31 March 2019</li> <li>b) 3 April 2019</li> </ul> </li> </ul>
5.	<ul> <li>As required by MCoA B15, current versions of key documents had not replaced outdated versions on project websites, including the: <ul> <li>Sydney Metro C&amp;SW Small Business Owners Support Program dated 28/11/2017 rev 1.0 was not the Environmental Representative (ER) endorsed version (should be evidenced as an attachment)</li> <li>TSE Community Communications Strategy PLN-002040-03 dated 19/12/2017 has not been replaced with version 4.0 dated 24/07/2018</li> <li>TSE Business Management Plan PLN-002042-02 dated 19/12/17 was not replaced with version 04 dated 07/09/18</li> </ul> </li> </ul>	NC	HIGH	Sydney Metro Project Communications action(s): Sydney Metro committed to uploading an ER endorsed SBOSP document on the project website and instructing the TSE contractor to upload the latest versions of their CCS and BMP on their project website. Independent Environmental Auditor verification: Current versions of the Support Program, Communications Strategy and Business Plan verified on 25/03/2019 as updated on project/public website. Action considered CLOSED.

Ref	Audit Finding	Status	Priority	Action Plan
6.	Sydney Metro Project Communications did not have visibility or records of Principal Contractor required <u>audits</u> and outcomes as demonstration of a compliance management assurance process. <b>Note:</b> The project approved Sydney Metro Construction Environmental Management Framework (required by MCoA C1) section 4.5 c) vi) requires <u>auditing</u> to be undertaken. Additionally, contractor Business Management Plans generally state that "auditing" will be undertaken as part of the MCoA E64 e) monitoring program. <i>Whilst it is acknowledged that Sydney Metro has recently</i> <i>issued a standardised approach for each contractor to follow</i> <i>to ensure consistency for business monitoring, evaluating</i> <i>and reporting, this does not constitute an</i> <b>audit</b> per ISO and <i>other internationally recognised definitions hereof.</i>	OBS	LOW	<ul> <li>Sydney Metro Project Communications action(s): <ul> <li>a) Engage with various contractor Compliance Working Group facilitators to secure objective evidence of business-related auditing being undertaken or planned.</li> <li>b) Engage with the project Independent Environment Auditor to plan targeted audits of business-related Planning Approvals should the need arise and/or based on outcomes of a) above.</li> </ul> </li> <li>Responsible person(s): Rebecca Raap</li> <li>Due date(s): <ul> <li>a) 30 April 2019 and ongoing hereafter</li> <li>b) 31 May 2019, if required</li> </ul> </li> </ul>
7.	<ul> <li>The CSMW Contractor "Business / Organisation Survey Questions" form did not prompt or capture key business information such as: <ul> <li>main delivery times</li> <li>reliance on foot traffic</li> <li>Signage or advertising that may be impacted by construction works.</li> </ul> </li> <li>Furthermore, systematic collection and assessment of this information was not being summarised in the CSMW contractors business impact registers.</li> <li>Note: The project approved Sydney Metro Construction Environmental Management Framework required by MCoA C1 stipulates minimum business operational information profiling in section 4.5 c) ii). Whilst some of these considerations are captured in the above-mentioned Business Survey Question form, 3 key items of information indicated above were not.</li> </ul>	OBS	MEDIUM	<ul> <li>Sydney Metro Project Communications action(s): <ul> <li>a) Feedback on Business Survey Question form to be provided to CSM contractor as part of their formal Business Management Plan review.</li> <li>b) Ensure and demonstrate that the CSMW contractor includes missing Construction Environmental Management Framework required business profiling information in an updated Business Survey Question form.</li> <li>c) Ensure and demonstrate that the CSMW contractor implements the updated Business Survey Question form and/or records related data should the opportunity arise.</li> </ul> </li> <li>Responsible person(s): Rebecca Raap / Kristina Cimino</li> </ul>

Ref	Audit Finding	Status	Priority	Action Plan
				<ul> <li>a) 18 March 2019 (completed)</li> <li>b) 15 April 2019</li> <li>c) For new businesses / premise occupancies, retrospective from 2 January 2019 and ongoing.</li> </ul>
8.	<ul> <li>The Sydney Metro Business Survey template used for initial Business Profiling was not a version controlled document required by Sydney Metro IMS requirements.</li> <li>Furthermore the Sydney Metro Business Survey template did not prompt required** information on "Signage or advertising that may be impacted by construction works"</li> <li>** Specified in the Sydney Metro Construction Environmental Management Framework, section 4.5 c) ii).</li> </ul>	OFI	LOW	<ul> <li>Project Communications action(s): Although future minor works might not require direct Project Communications involvement, there is potential for the Business Survey template to be used by new contractors and/or future Sydney Metro projects, therefore Project Communications will:</li> <li>a) Update the Business Survey template with missing information, and version control this form through IMS / iCentral.</li> <li>b) Conduct a review to identify any other relevant documents needing to be controlled through the IMS / iCentral.</li> <li>Responsible person(s): Rebecca Raap</li> </ul>
				Due date(s): 30 May 2019
9.	Completed Business Surveys were not always filed in Consultation Manager for access and/or compliance demonstration purposes.	OFI	LOW	<ul> <li>Project Communications action(s): <ul> <li>a) Contractors reminded by email to record completed Business Surveys in Consultation Manager.</li> <li>b) Consider reviews and/or audits to assess the adequacy of business profile and impact information being recorded in Consultation.</li> </ul> </li> </ul>
				Responsible person(s): Rebecca Raap
				Due date(s): a) 19 March 2019 (completed) b) 30 September 2019

## 2.3 Supplementary audit details on SBOSP

The following audit notes support the Audit Findings in 2.2 above.

No.	Requirement / Observation:
SB-1	<ul> <li>MCoA E64 d) requires a specialist Retail Advisory / Support Panel (RASP) be established to administer the Small Business Owners Support Program.</li> <li>a) Sydney Metro Environment formally raised this as a Non-Compliance Report in November 2018</li> <li>b) As Corrective Action, Sydney Metro Communications committed to a panellist procurement process targeting end 2018</li> <li>c) As at 7 March 2019, three (3) RASP appointments had been finalised, and an Independent Facilitator agreed upon.</li> <li>d) The above-mentioned non-compliance will be closed internally through the Sydney Metro Planning Approval Compliance Tracking Program.</li> </ul>
SB-2	<ul> <li>MCoA E64 d) requires a Small Business Owners Support Program to be implemented to provide assistance to adversely affected businesses impacted by construction of the project.</li> <li>a) Elements of the SBOSP could not be implemented given SB-1 above</li> <li>b) Currently, adversely affected businesses requiring further assistance have not been "escalated" to activate the SBOSP</li> <li>c) Anecdotally, one Crows Nest business was thought to have ceased business as a result of the project</li> <li>d) Sydney Metro information systems did not readily provide details of potential candidates to be reviewed for business support or definitive action plans</li> <li>e) Principal Contractor records indicated there were a handful of small business that had indicated their business had been impacted, examples of which are summarised in SB-3 and 4 below</li> <li>f) For reasons above, including non-functionality of a RASP, this Planning Approval is considered non-compliant, especially in the absence of evidence demonstrating implementation.</li> </ul>
SB-3	<ul> <li>The TSE Contractors Monthly Report of Nov'18 indicated "a small business owner in the CBD (name withheld for privacy reasons) was in the process of gathering supportive information for a loss of business claim. He claims a sustained downturn in cash flow following the high impact noise of demolition of adjoining buildings". Consultation Manager records indicated: <ul> <li>19/10/17, business owner communicated business disruption and falling client numbers.</li> <li>28/11/17, meeting held, records demonstrated on average 1 client per day during demolition versus 12 to 15 prior. Sydney Metro response was to raise a complaint and investigate a claim with TfNSW.</li> <li>15/11/18, business owner advised Community Representative that he/she wishes to seek compensation. Sydney Metro offered to assist with wording of the claim.</li> <li>4/03/19, Sydney Metro followed-up (noting this issue was raised by the Independent Auditor during the post audit review on 28/02/19)</li> </ul> </li> </ul>
	claim and soliciting formal information. There did not appear to be any information provided to management to inform and/or enact the implementation of the SBOSP commitments to support and assist albeit non-financially.

SB-4	The Weekly Sydney Metro - CSMW Weekly Communication Meeting minutes from 4/12/18 under an item entitled:		
	Businesses initiatives (for impacted businesses):		
	"ACTION: LOR to draft potential initiatives. Business tracking/register. Working on one for (name withheld) Café, (name withheld) Sushi, (name withheld) Convenience store"		
	<ul> <li>The above-mentioned has not been carried forward in subsequent meeting minutes.</li> </ul>		
	<ul> <li>Contractor Monthly Reports did not evidence this as an issue and/or action.</li> </ul>		
	Auditor observation. The above-mentioned did not appear to be recognised or widely known to Sydney Metro Management, and was not tabled on the day of the audit as indicative of potential SBOSP consideration or implementation.		
SB-5	Procedures and process for the Small Business Owners Support Program.		
	There were mixed messages and conflicting information regarding the functionality and workflow and outcomes of the SBOSP. For example:		
	<ul> <li>a) Planning Approval Condition allocation by Sydney Metro indicates retention by Sydney Metro for Small Business Owners Support Program obligations</li> <li>b) Sydney Metro Communications indicated that Principal Contractors are responsible for the SBOSP required Business Action Plans unless escalated (noted Business Action Plans is a Sydney Metro SBOSP term however)</li> <li>c) Sydney Metro SBOSP s3.3 states that the SBOSP will be activated through escalation of a small business identified as requiring further assistance</li> <li>d) CSMW contractor Business Management Plan s5.7 requires the referral of eligible businesses to the SBOSP if adversely affected</li> <li>e) TSE contractor Business Management Plan s3.2.4 stipulates referral to the SBOSP if a complaint about being adversely affected cannot be resolved by available mitigation measures</li> <li>f) Responsibility for promoting and managing the SBOSP within Sydney Metro was not defined</li> </ul>		
	<ul> <li>g) Information sighted was predominantly noise and vibration impact focused, to the detriment of business viability impacts</li> <li>h) There appeared to be a mindset that complaints and escalation of insurmountable issues were the triggers for business adversity.</li> </ul>		

## 2.4 Audit process summary

Further to the Small Business Owners Support Program assessment above, the following summarises additional assessment undertaken.

#### Strategies & Plans

As required by Planning Approvals, Sydney Metro has developed an overarching Community Communication Strategy, observed to be implemented as relevant to the business focus scope of this audit including distribution of information concerning construction site activities. Principal Contractors in turn have developed CCS's such as those referenced in Appendix 1. For smaller contracts such as NCW and/or where Sydney Metro had a Community function placed in the contractors Project site office, a Business Management Plan was developed by Sydney Metro or incorporated in a specific CCS. Otherwise, contractors were responsible for developing and implementing BMP's such as those referenced in Appendix 1.

#### Business Consultation (re project impacts)

Initial consultation takes place utilising a Business Survey Form, this establishing a business profile and recording trading information as required by the CEMF. There were some weaknesses though in content capture and information/records retention though

Subsequent to this profiling, consultation mechanisms included one-on-ones and doorknocks (usually conducted by Metro / Contractor communications personnel) plus consultation meetings, some general, and others business specific (often involving project functions additional to community). A Consultation Manager (database) was maintained by Metro and Contractors alike, reflecting various outbound and inbound communication mechanisms as well as records of meetings, complaints et al.

#### Business Management Plan (implementation)

Business Impact Registers (REMM requirement BI 2) reflecting input from the Business Surveys and subsequent consultation described above had been incorporated in contractor BMPs. Specifics around business impacts and related measures appeared to meet the intent of the MCoA E64 (c) regarding management strategies for each construction site. An Audit Finding was raised about missing CSM Business Impact Register details though.

#### Monitoring, Review & Reporting

Monitoring in general was observed to be taking place through Community staff engagement with community / business with business queries and feedback captured in the Consultation Manager. Again, an internally identified weakness, this time regarding the MCoA E64 e) required Monitoring Program was noted as being addressed, sighting a new reporting template provided to contractors. Compliance was evidenced through existing contractor monthly reports referenced in Appendix 1, although these varied in terms of information quality and business program effectiveness assessment, given the absence of Sydney Metro nominated performance parameters and criteria. The complaints management system addressed specific business issues albeit a negative indication of performance. The audit also noted the information indicating a few issues referred to the Community Mediator (another independent process) although not confined to small business viability and/or hardship.

# **Appendix 1: Audit documentation**

Key systems, documents, reports, information and records that were reviewed, accessed or sighted during the audit process were:

Documents	Information / Records
Sydney Metro Strategies & Plans:	
Sydney Metro C&SW Construction Environmental Management Framework (CEMF) v3.1 dated 15/08/2016	Sydney Metro Non-Compliance Report re Retail Advisory Support Panel dated 2018-11-22
Sydney Metro C&SW Overarching Community Communications Strategy v6, 21/1/19	
Contractor Strategies:	
LORA~CSM Community-Communications-Strategy rev3, 25/7/18	
JHCPBG~TSE Community Communications Strategy PLN-002040-04 dated 24/07/18	
Business Consultation (impact identification)	
Sydney Metro C&SW Community Communications Strategy - Northern Corridor Works v1, 21/11/18	Sydney Metro Business Surveys for Northern Corridor Work
LORA~CSM Business-Management-Plan rev2, 30/7/2018	CSM Stakeholder Consultation survey question sheet
	CSM CNVIS Consultation Register
	Consultation Manager Records
LORA Business Impact Risk Register, included as Business Register Appendix B, pages 35-47 of abovementioned LORA BM	Community Forums e.g. Central Station Forums 1 and 3 of August / September and November 2018
JHCPBG~TSE Business Management Plan PLN- 002042-04 dated 07/09/18	Business Surveys for TSE CBD Works
TSE Business Impact Risk Register, included as Appendix B pages 42-73 of above JHCPBG BMP	Consultation Manager Records
	One-on-ones, door-knocks etc. summarised in Reports below
Business Management Plan (implementation)	
Sydney Metro C&SW Small Business Owners Support Program dated 28/11/2017 rev 1.0	Small Business Owners Support Panel - Terms of Reference (draft undated)
	Small Business Panel Resumes of BS, LZ and RW
	Appoint Confirmation Letters for above
	Consultation Manager information and extracts
Monitoring, Review & Reporting	

Sydney Metro Proposed Standard Measures for	LORA Central Station Monthly Reports
Business Management Plans, dated 2018-11-01	dated Dec'18 and Jan'19
	LORA CSM 6-monthly Construction
	Compliance report excerpt 2018-11-05
	Minutes of LORA Central Station Weekly
	Communications Meetings (hosted by
	Sydney Metro) of 4/12, 11/12, 18/12,
	15/1, 22/1 and 30/1
	JHLOR SMU 6-monthly Business
	Management Report to 2018-09-30
	Minutes of JHLOR SMU Fortnightly
	Communications Meeting minutes of
	7/12, 9/1, 16/12 and 24/1
	JHCPBG~TSE Monthly Community
	Engagement Reports, SMCSWTSE-JCG-
	TPW-PM-RPT-090063, 090064 and
	90112 dated Nov'18, Dec'18 and Jan'19
	respectively.

# **Appendix 2: Audit Credentials**

## Audit process

This Independent Environment Audit comprised an off-site desktop review, an onsite or office audit and a post audit assessment of documentation and records. The audit assignment was undertaken by the QEM Consulting Pty Ltd Auditor below, with another competent Auditor not directly involved in the audit conducting a peer review of the report prior to finalising.

The audit process including scoping and planning was undertaken in accordance with the principals of AS / NZS / ISO 19011:2018 – Guidelines for Auditing Management Systems.

Audit Organisation:	QEM Consulting Pty Ltd
Auditor & Report Author:	Larry Weiss
Auditor Qualification:	Exemplar Global EMS Auditor Accreditation no. 12355
Affiliations:	Member, Engineers Australia 938517
<b>Report Reviewer:</b>	Julie Dickson
Auditor Qualification:	Exemplar Global EMS Auditor, Accreditation no. 13573
Affiliations:	EIANZ Certified Environmental Practitioner, Reg. no. 221

## Auditor information

## Auditor certification

The abovementioned Auditor certifies as having personally undertaken this Independent Audit and preparing the contents of this Independent Audit Report; and that the findings of the audit are reported truthfully, accurately and completely; and that he / she has exercised due diligence and professional judgement in conducting the audit. The signed Statement of Interests and Association in our services agreement with Sydney Metro confirm our Auditor's independence and absence of pecuniary interest in the audited project.

## Audit disclaimer

It should be noted that this report is a snapshot in time, based on selected and supplied documentation, as well as observations on the day only, and does not purport to be a definitive confirmation of overall or potential compliance or vice-versa.

----- END REPORT -----