

NSW Government response

Public Accounts Committee - Accountability
measures for decision-making: Critical
Communications Enhancement Program

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Introduction

The Public Accounts Committee's [report](#) on 'Accountability Measures for decision-making: Critical Communications Enhancement Program' was tabled in Parliament on 13 February 2025.

The Critical Communications Enhancement Program (CCEP) was the first infrastructure project examined by the Public Accounts Committee as part of its ongoing inquiry into accountability measures for major infrastructure projects.

The NSW Government welcomes the Public Accounts Committee's report. It also thanks the committee for acknowledging the commitment and professionalism of the many individuals and organisations involved in the delivery of the Program.

The NSW Government supports the transparency and accountability principles in the planning, delivery and reporting of major infrastructure projects which underpin the report's findings.

The Committee made 14 findings and seven (7) recommendations. The NSW Government's response to each recommendation is outlined from page 5.

Critical Communications Enhancement Program

The CCEP is expanding the footprint of the NSW Public Safety Network (PSN) to build a single interoperable radio network for emergency and essential services organisations that will reach 99.7% population coverage in NSW.

Next to Australia's Triple Zero Call Service, the PSN is the most important critical communications network in NSW and one of the largest in the world. Around 38 million calls made were made across the PSN in 2023-24, with 83% of calls made by Emergency Services Organisations (ESOs).

The PSN provides critical radio communications infrastructure that helps emergency and essential services keep people and places safe across NSW. A single integrated network prevents asset duplication, reduces maintenance costs and allows users from multiple organisations to communicate with each other to better coordinate responses to emergencies and natural disasters.

Prior to commencement of the CCEP, PSN land coverage was less than 35%, reaching less than 80% of the state's population. Since rollout of the CCEP commenced, PSN coverage now reaches 62.8% of NSW landmass and 99.6% of the state's population. On completion, the PSN will reach 85% of NSW landmass and 99.7% of the population.

The PSN was designed to meet ESO mission-critical requirements and uses P25 radio technology – a global best practice standard. The network maintains an average of 99.95% availability. The expanded network is designed to be future state, allowing for the overlay and integration of new technologies as they emerge and evolve.

The PSN has been co-designed with ESOs with more than 800 user requirements approved by each agency. Requirements were further updated in June 2020, to include increased resiliency measures (increased solar sites, battery capacity, and power redundancy) following lessons learned from the Black Summer bushfires.

On completion of the program, emergency and essential service organisations will migrate to the PSN and decommission their legacy communications networks. Stay Safe Keep Operational (SSKO) funding is available to ESO customers to ensure continuity of critical communications until the delivery of the CCEP is complete and migration of individual radio networks has been finalised.

Like many infrastructure programs, CCEP has been significantly impacted by multiple events including the 2019-20 Black Summer Bushfires, the COVID-19 pandemic slowing work, supply chain challenges as well as severe weather events and flooding across NSW in 2021, 2022 and 2025.

Phased funding over five (5) years also slowed down program completion, with updated schedules included in each business case. As a result, the program delivery timeline was re-baselined in February 2023, to a completion date of August 2027.

The CCEP is now 79% complete, with more than 550 of 663 planned new or improved PSN sites delivered. The program is on track to deliver against the revised end date of August 2027.

Response to recommendations

Recommendation 1

The NSW Government should provide the Public Accounts Committee with detailed information on current business case and business case assurance and accountability processes including any recent and ongoing improvements.

Supported.

The CCEP business case complied assurance processes in place at the time of its consideration.

NSW Treasury released updated Business Case Guidelines in November 2024. This included changes to ensure business cases efficiently support informed decision-making and provide better balance between the need for evidence and the costs of obtaining it.

Details of current business case requirements are set out in the [NSW Government Business Case Guidelines TPG24-29](#). A project of the size and risk of the CCEP requires a two-stage business case (i.e. a preliminary business case followed by a full business case) including eight components:

- a case for change
- options
- cost-benefit analysis
- financial analysis
- risk analysis
- monitoring and evaluation approach
- procurement approach
- management approach

Infrastructure NSW notes the [Final Business Case Evaluation Summary](#) was among the material considered during the Inquiry and remains published online. However, the full Business Case was used in Cabinet decision-making and cannot be made public under long-standing Cabinet conventions.

The key components of the independent investor assurance process include:

- monitoring conducted by Infrastructure NSW
- reporting regularly on projects based on inputs provided by delivery agencies
- Gateway, Health Check and Deep Dive Reviews conducted by independent reviewers
- sharing insights and building capability in the delivery of infrastructure projects, for example: the Trends and Insights Report

The Infrastructure Investor Assurance (IIAF) Gate 2 Review investigates the delivery agency's readiness to submit the Final Business Case for an investment decision and post funding approval to move to the Procurement stage. The Final Business Case is the key document that justifies the project scope and investment as an appropriate and deliverable response to the established service need which will maximise benefits at optimal cost.

The key question considered at the Gate 2 review is ‘how well has the project proven that the preferred option best meets the service needs and maximises the benefits at the optimal cost?’

The CCEP has undergone 16 Gate and Health Check Reviews:

Date	Review
March 2015	Gate 1 Strategic Options
February 2016	Gate 2 Business Case
February 2017	Health Check
October 2017	Health Check
October 2018	Health Check
January 2019	Gate 3 Delivery Strategy & Readiness
June 2019	Gate 3 Delivery Strategy & Readiness
July 2019	Gate 4 Tender Evaluation
September 2019	Deep Dive
January 2020	Gate 4 Tender Evaluation
April 2020	Health Check
October 2020	Gate 2 Business Case
December 2021, June 2022, May 2023, December 2024 and March 2025	Health Check–Delivery

Table 1: iNSW Gate and Health Check Reviews for CCEP

The [Infrastructure Investor Assurance Framework](#) (IIAF) was updated in November 2023 and December 2024.

Key changes made in November 2023 included:

- Updating the Gate 6 Benefits Realisation review and enhance the Capital Portfolio Health Check review approach. Reform of the Gate 0 Go/No Go process.
- Removal of redundant and unused project classifications and streamline compliance requirements on agencies.
- Removal of the delegation for Delivery Agencies to establish their own Assurance Board to administer the functions of the IIAF, in-line with improving probity and transparency across the infrastructure portfolio.

In September 2024, the NSW Government also announced a major overhaul of the business case and assurance systems aimed at streamlining the assessment process for major infrastructure proposals, particularly in housing, health, and energy sectors.

This reform also raised the threshold for registering a project in the Assurance Portal from \$10 million to \$20 million, thereby reducing the administrative burden for smaller projects.

In December 2024, the NSW Government Business Case Guidelines TPG24-29, were updated to reflect the reform of Gate 1 to introduce a Go/No Go process and introduction of a fast-track assurance process for government commitments.

Infrastructure NSW has also commenced a process to revise the Infrastructure Investor Assurance Framework Workbooks. The Gateway Workbook Refresh due to be released in late 2025, will revisit Gates 1 through to Gate 6, Deep Dives and the Health Checks to ensure they remain fit-for-purpose and align with new Government priorities. The Gateway Workbook Refresh is undertaken with extensive consultation with delivery agencies, government, and industry stakeholders.

Recommendation 2

The NSW Telecommunications Authority should track and monitor the realisation of benefits, including land and population coverage, during the roll out of the Critical Communications Enhancement Program. This information should be annually reported to the Parliament of NSW and be made publicly available while the program is being delivered.

Supported.

NSW Telco Authority tracks and reports on benefit realisation monthly. This information is shared across the NSW Government including to ESOs, Infrastructure NSW, NSW Treasury and the Minister for Customer Service and Digital Government.

Benefits realisation information has always been and will continue to be made publicly available in the NSW Telco Authority Annual Report, which details the land and population coverage benefits the program has delivered, as well as additional information on network usage and availability. Agency Annual Reports are tabled in Parliament annually and are published on respective agency websites.

Recommendation 3

Once the CCEP is completed, a post implementation review, including an assessment of the business case benefits realised should be performed and reported to the Parliament of NSW and be made publicly available.

Supported in principle.

Once the CCEP is completed an evaluation will be undertaken and published in line with the requirements set out in the [NSW Government Evaluation Guidelines TPG22-22](#).

The IIAF Gate 6 Review will also be completed. It investigates the extent to which benefits, as outlined in the Final Business Case and/or the Benefits Realisation Plan, have been delivered. The key question considered at the Gate 6 review is 'How well have the benefits outlined in the final business case been realised and what lessons can be learnt from this?'

The Gate 6 Review Reports are Cabinet in confidence and not made publicly available. No changes to the current approach are anticipated.

Recommendation 4

Each year until completion, the NSW Government should report the annual and lifetime cost savings achieved from the CCEP.

Supported in principle.

The CCEP seeks to consolidate critical communications infrastructure. A key benefit of the program is that it avoids the need to invest capital in the future to upgrade the five separate ESO networks.

These possible future costs have not been budgeted or accurately estimated, because once the CCEP rollout began, major upgrades to the individual networks have not been considered.

As separate ESO networks are nearing end-of-life and are not interoperable, it is reasonable to assume that it is more cost efficient to upgrade a single interoperable communications network rather than five separate ESO networks. While these avoided future costs are genuine and significant, they do not represent savings against existing agency budgets and cannot be tracked.

CCEP will result in genuine cost savings relative to current agency budgets when ESOs decommission their existing networks and no longer need to meet the costs of their ongoing operation and maintenance. These savings will be relatively small compared to the avoided costs of undertaking major capital works and upgrades across the various existing networks.

These cost savings - both the ongoing savings compared to current agency budgets and the future capital savings - will mostly occur after completion of the CCEP project. As a result, the cost savings will not form part of the benefits realisation tracking, which will focus on land and population coverage.

Recommendation 5

That the NSW Telecommunications Authority ensures technical and governance arrangements are in place to support encryption and interoperability as part of the Critical Communications Enhancement Program delivery.

Supported.

NSW Telco Authority is working with its customers on the risks and costs of encryption so they can make informed decisions based on their specific needs.

Interoperability was implemented between NSW and Queensland in 2023 and is being progressed with Victoria and South Australia.

Recommendation 6

That the NSW Government undertake consultation to consider legislative change to require inbuilding radio coverage in non-government infrastructure projects for public safety.

Supported.

While consultation should occur, any legislative change should consider an investigation of the costs and benefits and be subject to a regulatory impact assessment process.

Recommendation 7

That the NSW Telecommunications Authority re-instate a NSW Telecommunications Authority led working group or identify an existing governance forum, with Emergency Service Organisation (ESO) representation, to support appropriate governance arrangements following the completion of the Program.

Supported.

NSW Telco Authority already chairs three working groups each month with representatives from all five ESOs (Fire and Rescue NSW, NSW Police Force, NSW Rural Fire Service, NSW Ambulance, NSW State Emergency Service).

These forums are used to govern both inflight sites under CCEP as well as the operational network. NSW Telco Authority is working with ESOs to co-design a post CCEP implementation governance framework.

ENDS.