

Drinking water regulatory audit

Guidance Note

November 2007

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Introduction

The key objective of Victoria's Drinking Water Quality Regulatory Framework is the protection of public health, utilising strategies such as catchment to tap risk management and continuous improvement. This risk-based approach to drinking water quality promotes proactive, rather than reactive, management of drinking water quality and is fully aligned with the approach used in the Australian Drinking Water Guidelines (ADWG) 2004.

The Drinking Water Regulatory Section believes that the audit process will identify continuous improvement and educational opportunities to support the on-going implementation of good risk management, and reinforce a culture of effective risk management in the Victorian water industry.

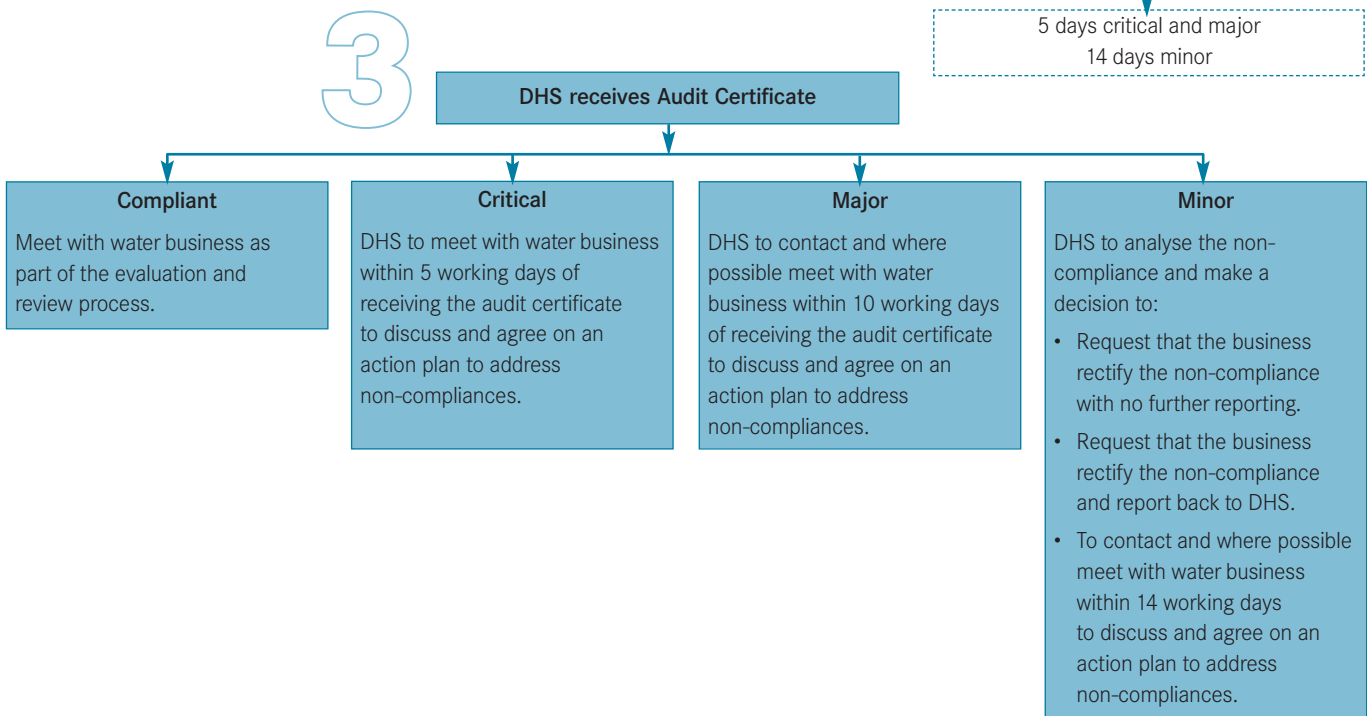
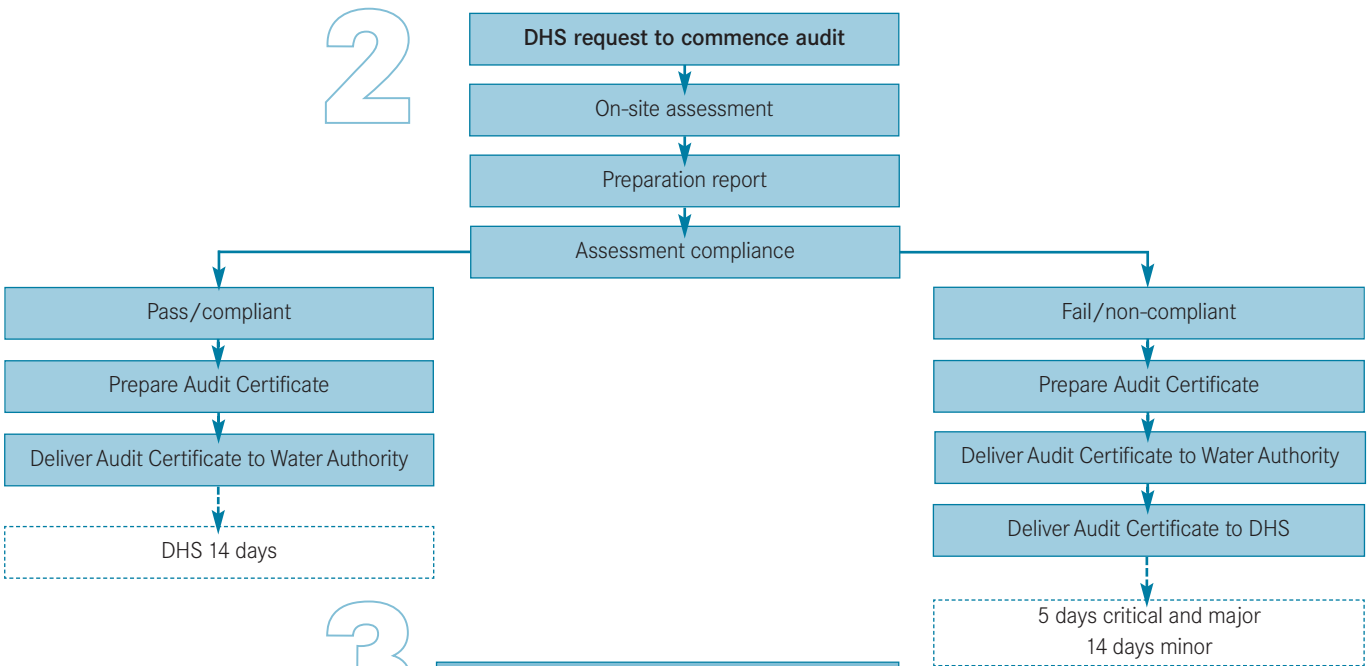
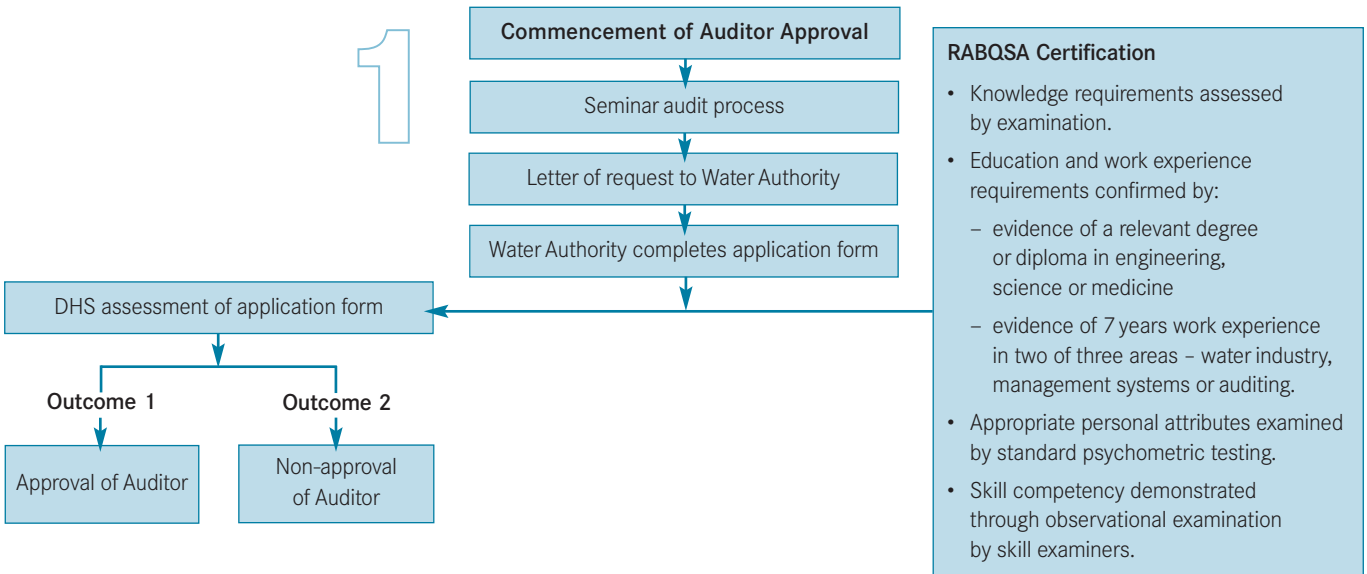
The *Safe Drinking Water Act 2003* (the Act) requires water suppliers and water storage managers to prepare, implement and review risk management plans for their supply of drinking water and regulated water. Under section 11 of the Act, the Secretary to the Department of Human Services, or their delegate, is empowered to request that a water supplier or water storage manager have their risk management plan audited.

The aim of this document is to provide additional information about the audit to all stakeholders, to provide guidance to approved auditors and to ensure that there is consistency in the assessing and reporting of audit results. This document covers the process by which an audit is requested by the Secretary, the process and criteria used to approve an auditor and information on the scope of the audit, including assessment and reporting on audits.

The Victorian safe drinking water audit is a systematic and independent examination of a water quality risk management plan, to determine:

- Whether the plan has been prepared in accordance with the requirements of the Act and the Safe Drinking Water Regulations 2005 (the Regulations).
- Whether the plan has been implemented and complied with.
- Whether the plan has been reviewed and, where appropriate, revised.
- Whether the risk management plan adequately identifies the nature and level of hazards and risks for each of the water supply systems covered in the scope of the audit.
- Whether the control measures identified in the risk management plans are in place operationally and are adequate to reliably control water safety risks.

The Audit Process



Roles for a Department of Human Services Regulatory Audit

The Drinking Water Regulatory Section

The broad role of the Department's Drinking Water Regulatory Section is to implement and monitor compliance with the *Safe Drinking Water Act 2003*, and to report to Parliament on water quality issues in Victoria.

The specific roles of the Section in relation to the regulatory audit system is to ensure that the audits are conducted in accordance with the Act and provide adequate support mechanisms including to:

1. Establish and maintain processes to approve drinking water risk management plan auditors.
2. Specify conditions attached to the approval of an auditor.
3. Determine the time, the frequency and the period to be covered by an audit for each water business.
4. Define the scope of the audit.
5. Define the criteria for assessment and reporting of the audit.
6. Work with water businesses to ensure the findings of the audits are effectively utilised or rectified as required, and to create sector-wide learning opportunities where appropriate.
7. Establish and maintain communications with all stakeholders.
8. Establish processes to manage complaints or disputes between auditors and water businesses.
9. Establish evaluation, review and revision processes to ensure that the audit is meeting all objectives for all parties.

Water suppliers and water storage managers

The role of the water supplier or water storage manager is to ensure that water provided to customers for the purpose of drinking is safe and complies with the quality standards specified for drinking water.

The role of water businesses in relation to the regulatory audit system is to:

1. Meet the requirements of the *Safe Drinking Water Act 2003* and the *Safe Drinking Water Regulations 2005* with respect to risk management plans and their audit.
2. Nominate an auditor for approval in accordance with the legislated requirements.
3. Ensure an approved auditor audits their risk management plan by the date and covering the period specified by the Drinking Water Regulatory Section.
4. Ensure that all documents required by the auditor, and the risk management plan are available.
5. Work with the Drinking Water Regulatory Section to ensure the findings of the audit are acted upon.
6. Undertake the audit at their own expense.
7. Disclose the audit results in the next annual water quality report.

The Auditor

An auditor is responsible for undertaking the audit of the risk management plan of the water supplier or water storage manager in order to determine if the plan is compliant with the requirements of the Legislation. The audit must be completed by the date, and cover the period specified by the Department of Human Services. The auditor must:

1. Meet the requirements of the Drinking Water Regulatory Section auditor approval process.
2. Ensure that the ‘Conflict of Interest’ criteria are complied with.
3. Assess whether the water business has complied with the relevant requirements of the Legislation in relation to their risk management plan.
4. Examine the documents specified in the Regulations as part of the audit.
5. Provide a certificate that states whether the water business has complied with the obligations imposed by the legislation, or if they have not, state the reasons and notify the Drinking Water Regulatory Section in accordance with the requirements of the Legislation.

Audit timing

The Secretary to the Department of Human Services or their delegate has the power to determine the audit frequency, the timing of the audit and the time period for which the risk management plan must be audited. This will be done by written notice to the water business.

Becoming an auditor

Only approved auditors may conduct the audit of a risk management plan and the related activities of a water supplier or water storage manager for the purposes of the *Safe Drinking Water Act 2003*. In accordance with section 13 of the Act, the Secretary to the Department of Human Services or their delegate can approve individuals nominated by water businesses as auditors based on a set of criteria to ensure that the auditor is appropriately qualified and skilled to conduct the audit, and that they have no conflict of interest that would impinge on their ability to objectively conduct the audit. The Department of Human Services has developed the process detailed in this document.

Auditor certification

In collaboration with the Department of Human Services and key stakeholders Water Services Association of Australia (WSAA) and the Victorian Water Industry Association (VicWater), RABQSA International¹ has developed an auditor certification scheme for drinking water quality management systems². The scheme provides international recognition for auditors of these systems to ensure that drinking water service providers can demonstrate that they are managing risk in accordance with the risk management framework as set out in the Australian Drinking Water Guidelines 2004 (ADWG). The scheme establishes an Australia-wide certification for auditors with competence in the area of drinking water risk management systems, and forms the core criteria for persons wishing to apply for approval to undertake audits in accordance with the *Safe Drinking Water Act 2003*. Certified auditors under the scheme will have the high level of skill and knowledge that the Department of Human Services is seeking for auditors to undertake the Victorian regulatory audits.

¹ RABQSA International designs, develops, and delivers certification for industry-specific and management system-specific streams.

² RABQSA International. *Drinking Water QMS Auditor Certification Training Scheme Certification Requirements*. Edition 1, 2007.

The scheme is competency based, with a requirement for pre-existing qualifications, and is administered by RABQSA International. The complete requirements and process are detailed in the RABQSA publication ‘Drinking Water QMS Auditor Certification Training Scheme Certification’ which can be found at http://www.rabqsa.com/cb_wsa. In summary, the certification requirements are:

- Knowledge of the ADWG Framework for Drinking Water Quality assessed by examination.
- Education and work experience requirements confirmed by:
 - evidence of a relevant degree or diploma in engineering, science or medicine
 - evidence of 7 years work experience in two of three areas – water industry, management systems or auditing.
- Appropriate personal attributes examined by standard psychometric testing.
- Skill competency demonstrated through observational examination by skill examiners.

The scheme provides two levels of certification – ‘Lead DW QMS Auditor’ and ‘DW QMS Auditor’.

The requirement of the Legislation is for an auditor to be an individual (‘a natural person’). However, the Drinking Water Regulatory Section recognises that an individual auditor may require a team to provide technical and other specialised support. The requirement for an approved auditor with responsibility for leading a team auditors to have certification at ‘Lead DW QMS Auditor’ level will be decided for each application. The factors that will be considered might include the size of the team, the audit certification status of the team members and the complexity of the business undergoing audit. The lead auditor must make final determination of assessments and grades and complete and sign the audit certificate.

The name and contact details of certified auditors will be available on the RABQSA database.

Conflict of interest

For the purposes of being approved as an auditor under the *Safe Drinking Water Act 2003*, the following are considered to be conflicts of interest:

- Writing or assisting in the preparation or review of the risk management plan for the water supplier/water storage manager that is making the application.
- In the past two years having been an employee of the water supplier/water storage manager making the application.

The amount and type of contract work the auditor, audit team or auditor’s employer has performed for the water supplier/water storage manager in the previous two years may also be taken into consideration when assessing the issue of potential conflicts of interest.

An approved auditor may have undertaken a previous audit of the water business.

Auditor approval

The Drinking Water Regulatory Section approval process for auditors requires the water business to submit the following:

- ‘DHS Auditor Application Form’
- RABQSA certification for the nominated individual
- ‘Conflict of Interest’ forms, including conflict of interest for potential team auditors.

The forms are available on the website www.health.vic.gov.au/environment/water/drinking and in Appendices 3 to 5 of this document.

Completed application forms must be lodged by the water supplier/water storage manager to:

**Assistant Director Environmental Health,
Department of Human Services
GPO Box 4057,
Melbourne, VIC 3001**

The Drinking Water Regulatory Section will provide written confirmation of approval of an auditor, identifying:

- the auditor name(s), including the Lead Auditor where applicable
- the risk management plan they are approved to audit
- the duration of the approval
- any conditions imposed on the approval.

Notification of unsuccessful applications will detail the reasons for the decision.

Penalties under the *Safe Drinking Water Act 2003*

Table 1: Penalties associated with the audit requirements:

Section 12(3)	Late notification or failure to notify of a non-compliance with Sections 7(1) or 8(1)	60 penalty units
Section 14	Conduct of an audit by a person not approved as an auditor	60 penalty units
Section 15	Failure of an auditor to comply with conditions of approval	60 penalty units
Section 16	Failure to meet ‘conflict of interest’ conditions	60 penalty units
Section 31	Failure to comply with an enforcement notice in relation to Sections 7, 8, 11(2)	240 penalty units

A penalty unit under Victorian law is currently \$107.43 – with annual indexation applied each calendar year.

Scope of audit

Section 10 of the Act describes a risk management plan audit, and inherently requires an auditor to confirm that a water supplier has complied with the obligations imposed by section 7(1) of the Act during the audit period or a water storage manager has complied with the obligations imposed by section 8(1) of the Act during the audit period.

The obligations imposed by the Act in relation to water quality risk management and audit are detailed in sections 7, 8 and 9 of the Act and regulations 6, 7, 8 and 9. These can be categorised into four distinct groupings, identified in this paper as auditable elements. They are:

- risk management plan (contents)
- risk management activities
- risks to water supply
- documented procedures.

The scope of the audit is defined by both the *Safe Drinking Water Act 2003* and the *Safe Drinking Water Regulations 2005*. The relevant clauses of both are listed in Appendices 1 and 2 of this document and the auditable elements are described in Appendix 6. Appendix 6 also makes reference to the relevant components and actions of the ADWG Framework for Managing Drinking Water Quality. These are provided for information only, and other risk management schemes can be used if they meet the requirements of the Legislation.

In conducting the audit, the auditor must consider breadth and effectiveness. They must:

- Determine whether the water supplier or water storage manager has met all the requirements described under sections 7(1) or 8(1).
- Determine whether the water supplier or water storage manager has developed a risk management plan that meets all the specifications in the Act (section 9) and the regulations in an effective manner.
- Inspect all documents specified in the regulations.

Additionally the auditor should determine whether the identified control measures and control measure combinations are in place operationally and are adequate to reliably control water safety risks. Critical limit criteria should be in place, should be monitored and corrective actions identified in the event of deviations from the target/critical limit criteria.

The Drinking Water Regulatory Section has developed a rigorous process to appoint skilled auditors with appropriate knowledge and credentials in both auditing and the water industry. The methods utilised during the audit will remain the domain of the auditor. However, in line with best practice, the Drinking Water Regulatory Section would expect auditors to:

- Determine whether the risk management planning and operations cover all systems and all aspects of the process that the water supplier or water storage manager utilises in the production of safe drinking water or management of regulated water.

- Obtain sufficient, reliable and relevant evidence to achieve the audit objectives and to undertake appropriate analysis and interpretation of this evidence to support the findings and the conclusions of the audit.
- Be cognisant of the water business use of industry-wide best practice, relevant guidelines and standards that guide the Australian water industry (such as the Australian Drinking Water Guidelines 2004) in relation to risk management planning and operations.
- Determine if risk management is an integral part of the business through best practice such as embedded corporate governance, risk management across the entire business or internal policy and practice of the water business that match the audit (regulatory) requirements³.

³ Hrudey SE, Hrudey EJ and Pollard JTP. Risk management for assuring safe drinking water. *Environment Int.* 32:948-957. 2006.

Assessing and reporting compliance

To be assessed as compliant, the water business must be able to demonstrate to the auditor that it has complied with all obligations imposed by the legislation. These are detailed in full as ‘auditable elements’ in Appendix 6 of this document. There must be evidence that each auditable element has been developed, has been implemented and is effective, that is it must be achieving the desired effect or result.

Elements of an effective procedure or process include⁴:

- a defined purpose
- a description of the operations (across a range of conditions)
- assignation of responsibility for actions and decisions
- identification of the records associated with the process
- key performance targets and measures of success
- reference documents.

A tabulated example of selected auditable elements in the category ‘risk management activities’ is shown in Table 2 with comments.

The auditor must assess each auditable element and assign a grade that describes the compliance of the water business with the requirements of both the Legislation and the actions detailed in their risk management plan.

To ensure that all businesses are measured against a common framework, the Department requires auditors to utilise the following system of grading. The system is a two-part system that requires the auditor to determine whether:

- The auditable element is present and being implemented across the entire business (breadth).
- The auditable element is effective and is achieving the desired effect or outcome (depth or quality)⁵.

The following sections describe the criteria for each compliance grade, and the actions the auditor is required to take. Table 3 provides a detailed summary of each grade and the required actions.

⁴ SQT Training Ltd. ISO 9000:2000 & Quality Lead Auditor Training Package. 2003.

⁵ This ‘breadth and depth’ approach is also used by WSAA in their Aquality assessment process to assess implementation of the ADWG Framework for Management of Drinking Water Quality.

Table 2: Assessment of selected risk management auditable elements

Auditable element	Legislative reference	Auditable Element		Compliance
		Present (Y/N)	Effective? Appropriate? (Y/N)	
Risk management activities				
Risk Management Plan prepared	SDWA 7(1)(a) 8(1)(a)	Y	Y	Full compliance. The business has prepared a risk management plan that covers all water sampling localities, and has been based on the 12 element ADWG 2004 framework ⁶ .
Identification of risk	SDWA 9(1)(b)	Y	N	Critical non-compliance See case study 3
Risk assessment	SDWA 9(1)(c)	Y	N	Critical non-compliance See case study 4
Development and implementation of preventative strategies (including appropriate control and monitoring measures)	SDWA 9(1)(d)	Y	N	Major non-compliance See case study 5
Implementation of the Risk Management Plan	SDWA 7(1)(b) 8(1)(b)	N	–	Major non-compliance. See case study 6
Compliance with the requirements of the Risk Management Plan	SDWA 7(1)(b) 8(1)(b)	Y	N	Minor non-compliances with the risk management plan See case studies 7, 8

⁶ National Health and Medical Research Council. Framework for Management of Drinking Water Quality, Chapter 3 in *Australian Drinking Water Guidelines, 2004*. Australian Government.

Compliance

A **compliant grade** can be assigned when each auditable element is present or has been implemented, and the auditor has examined sufficient evidence (such as water quality monitoring data, risk assessment and register, protocols, implementation plans, control measures, verification measures) to be satisfied that the element, as written or implemented across the entire business, is effective. When both these criteria are satisfied, the auditor can assign a compliant grade to that auditable element.

When a business is assessed as compliant on all auditable elements, the auditor is required to complete a certificate in accordance with sections 12(1)(2) of the Act and Schedule 1 of the Regulations.

The certificate should be forwarded to the Department of Human Services within 14 days of completion of the audit. This requirement on the auditor is a condition of their approval.

Fully compliant businesses will be invited to meet with the Drinking Water Regulatory Section to discuss the audit process, and any issues of concern or interest to both parties. This will be carried out as part of a broader evaluation and review process following the completion of all audits.

Case Study 1

The water supplier operates a reservoir that has a history of seasonal algal blooms. The risk management plan includes an annual monitoring program, with increased sampling frequency during those seasonal periods where records have shown that blooms are likely to occur. In addition to the monitoring protocol, the plan also includes a seasonal preventative program of dosing with algicides, working with the local land owners to reduce nutrient run-off, and a communications strategy to ensure that customers are not exposed to public health risk by consuming the water. The plant has PAC facility and the reservoir can be taken off-line if required. The plan includes the Blue-Green Algae Co-ordination Arrangements that inform Government Departments, including DSE and DHS and the Guidance for reporting to DHS under the *Safe Drinking Water Act 2003*.

Audit finding

The business has met the requirements of the Act because it has both identified a risk to the water quality and has put an effective action in place to manage the risk. Compliance is demonstrated for this element.

Case Study 2

The risk management plan of a water supplier includes a staff and stakeholder database that identifies the names, contact details and positions held by staff responsible for managing hazards and risks to the quality of drinking water. The database also includes a list of responsibilities of these staff that is mapped to the risk register for the water supply system.

In addition, a sub-set of the database identifies names and contact details staff with a role in the standard operating procedures used when there are incidents, events and emergencies that may adversely affect the water quality and safety of drinking water.

The databases are electronic, and readily available for all staff on the business intranet and in a controlled hard copy in a central location. There is a protocol for updating these lists that is managed by the HR section who are required to remove and add names as staff movement occurs.

Audit finding

The business risk management plan includes the names and details required by the Regulations, and also has a quality management protocol that ensures the list is up-to-date regardless of staff changes or restructures. The business is deemed to be compliant for this element.

Non-compliance

Following assessment of the risk management plan and implementation, the auditor will grade non-compliances as critical, major or minor based on the following criteria. The auditor will need to make informed judgement on the potential risk and public health impact of the non-compliance and **recommend corrective action**.

A **critical non-compliance** is defined as a non-compliance with one or more of the auditable elements, legislative requirements or risk management activities where a serious or imminent risk to public health is identified. That is, if the practice, the process or situation is allowed to continue (or conversely is not implemented) it will compromise the health of consumers.

In the event that the auditor identifies one or more critical non-compliances, the auditor is required to complete the audit certificate detailing the reasons for all non-compliances (the critical non-compliance as well as any other major or minor non-compliances) and to submit a copy of the certificate to the Department of Human Services within 5 days after the completion of the audit. This requirement is detailed in section 12(3) of the Act.⁷

It is expected that the auditor will provide the Department of Human Services with sufficient detail on the reason(s) for non-compliance so that the Department is able to initiate follow-up action.

The Department of Human Services will meet with the water business within 5 working days of receiving the audit certificate to discuss the critical non-compliance(s) and agree on a course of action to rectify the non-compliance(s). This could involve the submission of legislative solutions such as undertakings. The Department may request a second audit to ensure that the agreed solutions have been implemented by the water business.

A non-compliance can result from:

1. The implementation of a practice or measure that does not effectively address a risk identified in the risk management plan.
2. The failure to implement a practice that is contained in the risk management plan.
3. The failure to include a required element or identify a key risk in the risk management plan.
4. Failure to implement the Risk Management Plan for all drinking water systems.

Case Study 3

A water business has developed a risk management plan but has failed to consider risks or risk management activities that it should have been aware of such as those documented in best practice guidelines such as the CRC ‘Guide to Hazard Identification & Risk Assessment For Drinking Water Supplies’ during the risk assessment of their systems. For one supply with a contaminated source, the filtered water turbidity critical limit is 5 NTU prior to entry into the water treatment plant. The risk management plan does not identify an adequate response to high turbidity water leaving the filtration system. As a consequence, the risk management plan does not ensure that such events will be detected or acted upon, and safe drinking water is not guaranteed.

Audit finding

The business has failed to meet the requirements of the legislation (section 9(1) of the Act and regulations 6(1)(b)&(c)) and consequently has a critical non-compliance.

Case Study 4

The water business manages a Regulated Water supply to a small rural town, which has a high level of seasonal summer visitors. Untreated water is piped into residences (including commercial accommodation), schools and public spaces such as playgrounds. The major public health risk associated with the supply is the inadvertent consumption of the non-drinking water.

The water supplier has a comprehensive strategy to inform residents and business proprietors of the nature of the water. They have not worked with the local council to ensure that all taps in publicly accessible spaces have been appropriately sign-posted. Transient visitors who utilise public spaces are not informed of the nature of the water.

Audit finding

The risk management plan has failed to identify a strategy to inform visitors of the risks associated with the consumption of the town water. The failure to implement an effective preventive measure to inform visitors means that the business has not complied with sections 6(1)(b) and (c) of the Regulations and the omission is a critical non-conformance due to the likelihood of serious risk to public health.

⁷ Interpretation of *Legislation Act 1984*, sections 44 (1), (3) and (4).

Where a period of time is expressed to begin or be reckoned from a particular day, that day shall not be included in the period (five days from Friday is Wednesday)

Where a time period limited by an Act falls on a day that is a holiday (Saturday, Sunday or a public holiday) the time for completion is extended to the next working day (if the report is complete on a Monday, date for submission is the following Monday).

A **major non-compliance** is where there is a high potential for a risk situation, and that risk situation is likely to compromise public health if the non-compliance is not rectified.

In the event that the auditor identifies one or more major non-compliances, the auditor will be required to complete the audit certificate detailing the reasons for all non-compliances (the major non-compliance as well as any other minor non-compliances) and to submit a copy of the certificate to the Department of Human Services within 5 days after the completion of the audit. This requirement is detailed in section 12(3) of the Act.⁸

It is expected that the auditor will provide the Department of Human Services with sufficient detail on the reason(s) for non-compliance so that the Department is able to initiate follow-up action.

The Department of Human Services will contact, and where possible meet with, the water business within 14 days of receiving the audit certificate to discuss the non-compliance(s) and agree on a course of action to take corrective action(s). This could involve the submission of legislative solutions such as undertakings. The Department can also request a second audit to ensure that the agreed solutions have been implemented by the water business.

Case Study 5

A water business harvests water from an unprotected catchment, surrounded by a high level of dairy farming. The water is disinfected, but not filtered and the Risk Management Plan does not have a protocol to respond to *Cryptosporidium* detections. These waters are likely to be subject to contamination by cryptosporidium, and the risk of endemic cryptosporidiosis transmission has not been effectively addressed. The Australian Drinking Water Guidelines 2004 recommend a multiple barrier approach to minimise the potential for transmission of protozoa, and treatment for this supply should include effective filtration.

Audit finding

The potential for the risk of transmission of endemic Cryptosporidiosis has been assessed as high, and is likely to compromise public health if it is not rectified through the addition of adequate filtration, or other effective control measure to the treatment protocol. The business cannot be graded as compliant with Regulations 6(1)(b)&(c), 6(2)(a)(i)&(b)&(c). As there is a high potential for a risk situation, and that risk is likely to compromise public health, the auditor notes a major non-compliance.

Case Study 6

The water supplier runs a water filtration plant and the risk management plan identifies filter maintenance as a critical issue for ensuring safe drinking water. At the time of the audit no maintenance records can be located and there are no control limits set for the filter performance.

Audit finding

The lack of filter maintenance records and the lack of control limits for filter operation indicates that the filtration unit may not be operated as effectively as it should be. Although the water may be safe the lack of risk management means that there is a high likelihood that a filter failure would not be detected. Risk is not being adequately addressed and the business has a major non-compliance.

⁸ Interpretation of *Legislation Act 1984*, sections 44 (1), (3) and (4).

Where a period of time is expressed to begin or be reckoned from a particular day, that day shall not be included in the period (five days from Friday is Wednesday)

Where a time period limited by an Act falls on a day that is a holiday (Saturday, Sunday or a public holiday) the time for completion is extended to the next working day (if the report is complete on a Monday, date for submission is the following Monday).

A **minor non-compliance** is where there is a low risk situation as a result of a non-conformance with the risk management plan where the potential impact of the non-conformance is not likely to be a serious or imminent risk to public health. A non-conformance with a legislative requirement could not be considered as a minor non-conformance.

In the case where there are multiple minor non-conformances, the auditor may decide that collectively they constitute a major non-conformance, particularly where they may result in cumulative public health risk.

A finding of one or more minor non-compliances, unless they are judged to collectively form a major non-compliance, will not result in a ‘non-compliant’ finding on the audit certificate. In the event that the auditor identifies one or more minor non-compliances, the auditor can complete the audit certificate as for a ‘compliant’ assessment with the minor non-compliances listed as continuous improvement opportunities on a separate attachment to the audit certificate. The certificate should be forwarded to the Department of Human Services within 14 days of completion of the audit. This requirement on the auditor is a condition of their approval. The Department of Human Services will evaluate the list of continuous improvement opportunities and decide on one of the following actions:

- request that the business rectify the non-compliance without further reporting
- request that the business rectify the non-compliance and report back to Department of Human Services in a specified time frame
- meet with the water business within 10 working days to discuss further action.

Please refer to Table 3 (page 15) for a summary of compliance grades and auditor actions.

Case Study 7

Another water business has a risk management plan that has a small number of maintenance and inspection actions for a group of risks that have been identified as ‘Low’ level – ie. they have a minor consequence and are unlikely to occur. These activities are to be recorded in a ‘Low Risk Maintenance’ log book, and the risk management plan notes that they should be reviewed twice yearly.

Audit finding

At the time of the audit, the ‘Low Risk Maintenance’ log books have been filled out intermittently, and there is no evidence that the business has reviewed the findings in the preceding 12-month period. The auditor assesses this as a minor non-compliance (this is not in contravention of a section of the Legislation, and the impact is minimal). As all other parts of the audit have been successful, the auditor records a pass on the audit certificate, but notes this as a continual improvement opportunity.

Case Study 8

A water business risk management plan includes an action to develop ‘Hazard fact sheets’ for contaminants that have a low risk of occurring in their water supply. The purpose of these is to improve staff knowledge of potential contaminants that staff do not regularly deal with. The plan identified a date for completion of these sheets.

Audit finding

The business has not commenced work on the fact sheets at the time of the audit. The auditor assesses this as a minor non-compliance due to the low chance of contamination, and the fact that staff can find the information from other sources, although it would take a longer period of time to establish a response.

As all other parts of the audit have been successful, the auditor records a pass on the audit certificate, but notes this as a continual improvement opportunity.

Table 3: Summary compliance grades and auditor actions

Compliance Grade	Features	Auditor Actions	DHS Actions
Compliant	Sufficient evidence to confirm that the business has undertaken, prepared and/or implemented all actions in accordance with the Legislation and their risk management plan.	Complete compliant certificate for water business. Submit certificate to DHS within 14 days.	No action required.
Critical non-compliance	Non-compliance with one of the auditable elements, legislative requirements or risk management activities where a serious or imminent risk to public health is identified.	Complete non-compliant certificate for water business. Submit certificate to DHS within 5 days.	DHS to meet with water business within 5 working days of receiving the audit certificate to discuss and agree on an action plan to address non-compliances.
Major non-compliance	Non-compliance where there is a high potential for a risk situation, likely to compromise public health if the non-compliance is not rectified.	Complete non-compliant certificate for water business. Submit certificate to DHS within 5 days.	DHS to contact and where possible meet with water business within 14 working days of receiving the audit certificate to discuss and agree on action plan to address non-compliances.
Minor non-compliance	A non-compliance where there is a low potential for a risk situation and the potential impact of the non-compliance is not likely to be a serious or imminent risk to public health.	Complete compliant certificate for water business. Prepare a list of continuous improvement opportunities to be submitted with the audit certificate. Submit certificate to DHS within 14 days.	DHS to analyse the non-compliance and make a decision to: <ul style="list-style-type: none"> Request that the business rectify the non-compliance with no further reporting. Request that the business rectify the non-compliance and report back to DHS. To contact and meet where possible with water business within 10 working days to discuss and agree on action plan to address non-compliances.

Further information

For further information on any aspect of the drinking water risk management plan audit please email: dwru@dhs.vic.gov.au.

Guidance documents and forms can be downloaded from the Drinking Water Regulatory Section web page at www.health.vic.gov.au/environment/water/drinking

Audit certificates

In accordance with section 12 of the Act, auditors are required to provide the person that commissioned the audit a certificate at the completion of the risk management plan audit.

The certificate must be in the form specified in Schedule 1 of the regulations. A template for the risk management plan audit certificate can be downloaded from the website: www.health.vic.gov.au/environment/water/drinking.htm. The actions required in relation to the certificate for non-compliance are detailed in this document, and the audit certificate is shown in Appendix 3 of this document.

Audit certificates must be lodged with the Department of Human Services for all audits carried out in accordance with the *Safe Drinking Water Act 2003*. The time requirements are:

- Within 5 days of completion of an audit for a non-compliant outcome.
- Within 14 days of completion of an audit for a compliant outcome.

The auditor is required to forward copies of audit certificates to:

Assistant Director, Environmental Health
Department of Human Services
GPO Box 4057
Melbourne, VIC 3001

Appendix 1: Relevant sections of the *Safe Drinking Water Act 2003*

7. Water suppliers must prepare, implement and review risk management plans

- (1) A water supplier must–
 - (a) prepare a risk management plan in relation to its supply of drinking water and regulated water to the public; and
 - (b) implement the plan and comply with any requirements set out in the plan; and
 - (c) keep the plan under continuous review with a view to updating and improving it; and
 - (d) revise any aspect of the plan that is found, on review, to need revision.

8. Water storage managers must prepare, implement and review risk management plans

- (1) A water storage manager must–
 - (a) prepare a risk management plan in relation to its supply of water to a water supplier; and
 - (b) implement the plan and comply with any requirements set out in the plan; and
 - (c) keep the plan under continuous review with a view to updating and improving it; and
 - (d) revise any aspect of the plan that is found, on review, to need revision.

9. Risk management plan

- (1) A risk management plan in relation to the supply of water is a document–
 - (a) that contains a detailed description of the system of supply; and
 - (b) that identifies the risks to the quality of the water and the risks that may be posed by the quality of the water; and
 - (c) that assesses those risks; and
 - (d) that sets out the steps to be taken to manage those risks (including the development and implementation of preventative strategies); and
 - (e) that contains any other matters required by the regulations.
- (2) A risk management plan must address any risks specified in the regulations.
- (3) A risk management plan does not need to identify, or to make any provision in respect of, any risk in respect of which provision is required to be made in a risk management plan under section 31 of the **Terrorism (Community Protection) Act 2003**.

10 Risk management plan audit

- (1) A risk management plan audit is an audit by an approved auditor in relation to the risk management plan to determine–
 - (a) whether, in the case of a water supplier, the water supplier has complied with the obligations imposed by section 7(1) during the audit period;

- (b) whether, in the case of a water storage manager, the water storage manager has complied with the obligations imposed by section 8(1) during the audit period.
- (2) In conducting a risk management plan audit, the auditor must inspect all the documents that are specified by the regulations for the purposes of this section.

11. Secretary may require risk management plan audit

- (1) The Secretary may, by written notice given to a water supplier or water storage manager–
 - (a) require the water supplier or water storage manager to have its risk management plan audited in respect of a specified audit period by an approved auditor by the date specified in the notice; or
 - (b) declare when, how often and in respect of what audit period the water supplier or water storage manager is to have its risk management plan audited by an approved auditor.
- (2) A water supplier or water storage manager must comply with any requirement made in the notice and must do so at its own expense.

12. Audit certificate to be given

- (1) After conducting a risk management plan audit, an approved auditor must give the person who commissioned the audit a certificate stating the auditor's opinion on–
 - (a) whether, in the case of a water supplier, the water supplier has complied with the obligations imposed by section 7(1) during the audit period;
 - (b) whether, in the case of a water storage manager, the water storage manager has complied with the obligations imposed by section 8(1) during the audit period.
- (2) The certificate must be in the form, and contain the details, required by the regulations.
- (3) If the auditor is of the opinion that section 7(1) or 8(1) has not been complied with during the audit period, he or she must also give a copy of the certificate to the Secretary within 5 days after completing the audit.

Penalty: 60 penalty units.

- (4) If the auditor is of the opinion described in sub-section (3), he or she must include in the certificate details of the reasons why he or she is of that opinion.

13. Approval of risk management plan auditors

- (1) On the application of a water supplier or water storage manager, the Secretary may approve a natural person to conduct risk management plan audits of the supplier's or manager's risk management plan.
- (2) The Secretary may only approve a person as an auditor if the Secretary is satisfied that the person meets the auditor approval criteria set out in the regulations for the purposes of this section.

- (3) If the Secretary approves a person as an auditor, the Secretary must give the person, and the water supplier or water storage manager who applied for the approval, written notice of the approval.
- (4) In approving a person as an auditor, the Secretary–
 - (a) may impose any conditions on the approval that the Secretary considers to be appropriate; and
 - (b) may specify for how long the approval remains current.

14. Only approved auditors may conduct audits

A person must not conduct a risk management plan audit or issue a certificate in relation to such an audit unless he or she is an approved auditor.

Penalty: 60 penalty units.

15. Auditor must comply with conditions of approval

An approved auditor must comply with any condition imposed by the Secretary in approving him or her to be an auditor.

Penalty: 60 penalty units.

16. Conflict of interest to be avoided

A person must not conduct an audit of a risk management plan that he or she has written or assisted in preparing.

Penalty: 60 penalty units.

Appendix 2: Relevant sections of the Safe Drinking Water Regulations 2005

6. Risk management plan

- (1) For the purposes of section 9(1)(e) of the Act, a risk management plan must contain the following matters–
 - (a) the names and contact details of, and the positions held by, the persons responsible for managing hazards and risks to the quality of the water identified in the risk management plan; and
 - (b) details of the activities undertaken, and measures taken, to manage hazards and risks to the quality of the water identified in the risk management plan, including the method by which the effectiveness of these activities and measures is verified; and
 - (c) details of the features of the system of supply designed to assist in the management of risks to the quality of the water identified in the risk management plan, including the method by which the effectiveness of these features is verified; and
 - (d) in the case of a water supplier, details of the procedures for consultation with water storage managers and other water suppliers for the purpose of achieving agreement on the hazards and risks to quality of the water supplied–
 - (i) to the water supplier by water storage managers or other water suppliers; and
 - (ii) by the water supplier to other water suppliers; and
 - (e) details of procedures and management systems for–
 - (i) ensuring that the amount and purity of chemicals added to drinking water does not adversely affect the quality of that water or pose a risk to human health; and
 - (ii) controlling any residue or chemical by-products imparted to drinking water as a result of the addition of chemicals to water supplied for drinking purposes; and
 - (f) details of emergency management arrangements and procedures for dealing with an incident, event or emergency that may adversely affect the quality or safety of drinking water, or result in water being supplied that poses a risk to human health, including–
 - (i) the names and contact details of, and the positions held by, the persons responsible for dealing with such an incident, event or emergency; and
 - (ii) methods for communicating or disseminating information to the public in relation to any such incident, event or emergency.
- (2) For the purposes of section 9(2) of the Act, a risk management plan must address the following risks–
 - (a) the risk to human health that arises from the presence in water of–
 - (i) pathogenic micro-organisms; and
 - (ii) inorganic chemicals, including inorganic disinfection by-products; and

- (iii) organic chemicals, including pesticides, pesticide residues and organic disinfection by-products; and
- (iv) radiological parameters; and
- (v) algal toxins; and
- (b) the risks arising from an incident or event that may cause the organisms, substances and matters referred to in paragraph (a) to enter or be present in the system of supply of the water supplier or the water supplied by the water storage manager (as the case requires); and
- (c) the risk of transfer of the organisms, substances and matters referred to in paragraph (a) in water being supplied by the water supplier or water storage manager (as the case requires).

7. Risk management plan audits

For the purposes of section 10(2) of the Act, the specified documents are–

- (a) the risk management plan; and
- (b) any document or operating manual, procedure or protocol created pursuant to the risk management plan or containing material relating to the content of the risk management plan; and
- (c) any training and competency manual relating to the responsibilities of the staff of the water supplier or water storage manager (as the case requires) to manage and deal with–
 - (i) risks identified in the risk management plan; and
 - (ii) emergencies, incidents or events that may adversely affect the quality of–
 - (A) in the case of a water supplier, drinking water;
 - (B) in the case of a water storage manager, the water supplied or to be supplied.

8. Audit certificate

For the purposes of section 12(2) of the Act, a risk management plan audit certificate must be in the form of Schedule 1.

9. Approval of risk management plan auditors

- (1) For the purposes of section 13(2) of the Act, the auditor approval criteria are that the applicant for approval–
 - (a) holds an accreditation by an institution which, in the opinion of the Secretary, makes the applicant suitable for approval as a risk management plan auditor; or
 - (b) demonstrates to the Secretary that he or she has the experience, qualifications and skills necessary to independently conduct audits of risk management plans.
- (2) In addition, the applicant for approval must provide to the Secretary a written declaration that he or she has no conflict of interest that would impinge on their ability to objectively conduct an audit of a risk management plan.



Appendix 3: Risk Management Plan Audit Certificate

SCHEDULE 1

Regulation 8

Safe Drinking Water Regulations 2005

Risk Management Plan Audit Certificate

Certificate Number:

(insert a number to specifically identify this certificate from any other audit certificate issued by the approved auditor)

Audit period:

(insert period of audit relevant to this certificate)

To: _____
(insert full name and address of person who commissioned the audit)

Australian Business Number (ABN):

(insert the business number of the water supplier or water storage manager)

I, _____, after conducting a risk management plan audit of the
(print full name of approved auditor)

water supplied by, _____, am of the opinion that-
(insert name of the water supplier or water storage manager)

_____ *has/has not complied with the obligations
*(insert name of water supplier)

imposed by section 7(1) of the **Safe Drinking Water Act 2003** during the audit period.

_____ *has/has not complied with the obligations
*(insert name of water storage manager)

imposed by section 8(1) of the **Safe Drinking Water Act 2003** during the audit period.

*The details of the reasons for non-compliance are-

*insert/attach the details of the reasons for non-compliance

Signature of approved auditor: _____ Date:/...../.....

* Delete if not applicable.
Additional pages or reports can be attached to this certificate.



Appendix 4: Auditor application

An electronic copy of this form is available on the Section website

<http://www.health.vic.gov.au/environment/water/drinking.htm> or by e-mailing the Drinking Water Regulatory Section at dwru@dhs.vic.gov.au

Information requested in this form is collected under the authority of the *Safe Drinking Water Act 2003* section 13.

This information will be used to evaluate prospective auditor applications.

Please refer to the guidance note '*Auditing of risk management plans*' for information relating to the completion of this application.

Applicants must ensure that the information provided is accurate and that it addresses all the requirements set out in the guidance notes. The Department of Human Services will handle all information in accordance with privacy legislation.

Water Supplier/Water Storage Manager Information

Name: _____

Position: _____

Business Name: _____

Address: _____

City: _____ Postcode: _____

Email address: _____

Telephone: _____ Fax: _____

Prospective auditor information

Name: _____

Position: _____

Company: _____

Address: _____

City: _____ Postcode: _____

Email address: _____

Telephone: _____ Fax: _____

Prospective auditor’s referees

Name	Association with auditor	Contact details

Areas where prospective auditors will seek additional technical support

Technical discipline	Organisation/individual to provide support/expertise*	Skills/Experience (Brief)*

*can be included as an attachment

Check List

Please ensure the following are attached:

- Applicant current CV, including audit log
- Applicant RABQSA auditor certification
- Applicant conflict of interest declaration

Further information (optional)

Request by water supplier/storage manager

I ‘insert name’ of ‘insert name of water supplier/storage manager’ request the approval of ‘insert name of auditor’ to audit my risk management plan under the *Safe Drinking Water Act 2003*.

Signature: _____ Date:/...../.....

Certified drinking water quality management system auditors will be listed on the RABQSA website.

Please forward this completed application and attachments to:

Assistant Director, Environmental Health
Department of Human Services
 GPO Box 4057,
 Melbourne, VIC 3001
 Fax: (03) 9096 9182

Appendix 5: Conflict of interest declaration – Application for approval as DHS auditor



Name in full: _____

Postal address: _____

City: _____ Postcode: _____

Telephone Nos Private: _____ Business: _____

Fax: _____ Mobile: _____

Email address: _____

Business name: _____

Declaration:

I, _____ of _____ declare that:

- I do not have any personal bias or inclination which would in any way affect my decisions in relation to the above business.
- I do not have any personal obligation, allegiance or loyalty which would in any way affect my decisions in relation to the above business.
- I did not prepare, implement, review or revise the above business' risk management plan in relation to the supply of water
- I have not been employed by the above business in the previous two years.
- No person assisting me in the audit process has any conflict of interest.

except as set out below:

(List potential conflicts, including the contract work you and or your employer has performed for the Subject in the previous two years)

I undertake to make a further declaration detailing any conflict, potential conflict or apparent conflict that may arise during the contract period. Should any conflict appear to compromise me, I agree to abstain from any related decision.

Signed: _____ Date:/...../.....

Witness

Name: _____

Signature: _____ Date:/...../.....

Appendix 6: Table of auditable elements

Auditable element	Legislative reference	Notes ^{9, 10, 11}	ADWG Framework for Drinking Water Quality Reference Element/ Component/Action
Risk management activities			
Risk management plan prepared	SDWA 7(1)(a) 8(1)(a)	<p>The risk management plan must exist, and should be familiar and accessible to all relevant staff. The plan must include those elements, and those risks detailed in section 9 of the Act and regulations 6 and 7.</p> <p>For water suppliers the plan must cover the water supply up until the point that the water supplier commences storage and treatment processes. It must also include any regulated water supplies.</p> <p>Features of a water business that support a risk management plan might include organisational policy, risk management committees and adequate resources.</p>	E10 C1 A1 E10 C1 A2
Identification of risk	SDWA 9(1)(b)	<p>Based on the system description and auditor knowledge, the auditor can determine the general sorts of risks that could reasonably be expected to be addressed by the risk management plan.</p> <p>The plan should also include the risks that must be considered under regulation 6(2) of the Safe Drinking Water Regulations 2005.</p> <p>The auditor should sight evidence that a recognised approach or framework has been applied to identify the risks to the system.</p>	E2 C2 A2 E2 C2 A3 E2 C3 A1 E2 C3 A2
Risk assessment	SDWA 9(1)(c)	<p>Risk assessment should be undertaken by means of a recognised process or framework such as a ‘consequence and likelihood’ model or by use of risk management principles.</p> <p>A justifiable process, such as the use of technical information or operational data should be used to assign identified risks into categories, based on their likelihood and potential impact.</p>	E2 C3 A1 E2 C3 A2 E2 C3 A3 E2 C3 A4 E2 C3 A5
Development and implementation of preventative strategies (including appropriate control and monitoring measures)	SDWA 9(1)(d)	<p>The auditor should see evidence that appropriate and effective preventive measures have been put in place to manage identified risks.</p> <p>The auditor should also be able to assess if the measures in the plan would not effectively manage the identified risks.</p>	E3 C1 A1 E3 C2 A1 E3 C2 A2 E3 C2 A3
Implementation and compliance with the requirements of the risk management plan	SDWA 7(1)(b) 8(1)(b)	<p>The plan must be implemented in its entirety, and time components must be adhered to or met.</p> <p>If the plan contains elements whose implementation does not conform with the risk management plan but whose effect is not directly related to the protection of public health, the auditor would assess these as minor non-compliances and list them as ‘continuous improvement opportunities’ on the audit certificate.</p>	E4 C2 A2 E10 C1 A1 E10 C1 A2
Continuous review, update and improvement of risk management plan	SDWA 7(1)(c) 8(1)(c)	<p>The business should be committed to on-going review and revision of the risk management plan to ensure the plan remains relevant to the system and to measure progress against the risk management plan.</p>	E1 C2 A3 E1 C3 A3 E2 C3 A6 E3 C1 A2 E4 C3 A1 E6 C2 A1 E6 C2 A3 E9 C2 A2 E10 C1 A1 E10 C1 A4

⁹ Standards Australia and Standards New Zealand. AS/NZS 4360:2004 Risk Management Standards. August 2004.

¹⁰ The CRC for Water Quality and Treatment. A Guide to Hazard Identification & Risk Assessment for Drinking Water Supplies. A Research Report. April, 2004.

¹¹ Standards Australia and Standards New Zealand. Risk Management Guidelines Companion to AS/NZS 4360:2004. August 2004.

Auditable element	Legislative reference	Notes ^{9, 10, 11}	ADWG Framework for Drinking Water Quality Reference Element/ Component/Action
Revision of risk management plan	SDWA 7(1)(d) 8(1)(d)	<p>The auditor should sight evidence that the plan is reviewed and updated (if required) in response to the review when there has been a challenge such as an incident or emergency or a change to the system.</p> <p>This might include a feed-back mechanism, a risk or issues register or a system that tracks changes to the plan.</p> <p>The auditor should sight evidence of this organisational commitment such as a revision and review policy, a set of performance targets in the business plan or minutes and actions arising from the review process.</p>	E2 C3 A6 E3 C1 A2 E4 C3 A1 E6 C2 A3 E9 C2 A2 E10 C1 A1 E10 C1 A2 E10 C1 A4
Risk management plan (contents)			
Detailed description of supply	SDWA 9(1)(a)	<p>The description of the supply provides the basis for hazard identification and risk analysis. The description of the supply in the risk management plan can be in any form that the water supplier/water storage manager chooses, and should encompass catchment to customer tap.</p> <p>Detail must be comprehensive enough to develop a basic understanding of the supply (such as flora and fauna, human activity, chemicals used, design features), to facilitate effective hazard identification and risk analysis and risk of the supply, and to enable staff to manage any emergency or incident that arises in relation that part of the supply.</p>	E2 C1 A2 E2 C1 A3
The names and contact details of, and the positions held by, the persons responsible for managing hazards and risks to the quality of the water identified in the risk management plan.	Regulation 6(1)(a)	The risk management plan must identify the individuals who are responsible for managing the risks identified by the plan. How the organisation deals with risk to the water quality across the whole organisation is important, as well as the identification of the person with responsibility for risk or quality management.	E1 C2 A2 E4 C3 A1 E5 C4 A1 E5 C4 A2 E7 C1 A1
Details of the activities undertaken, and measures taken, to manage hazards and risks to the quality of the water identified in the risk management plan, including the method by which the effectiveness of these activities and measures is verified.	Regulation 6(1)(b)	<p>The comments that apply to section 9 of the Act are relevant to this section, in particular those relating to 9(1)(d).</p> <p>This regulation is important in that it requires the risk management plan to include measures to verify the preventive actions in the risk management plan to ensure that they are both effective and appropriate.</p> <p>The auditor can use their knowledge and judgement and the details of the risk management plan to determine if the activities/measures and the verification measures are appropriate.</p>	E3 C1 A1 E4 C3 A1 E3 C1 A2 E4 C4 A1 E3 C2 A1 E4 C4 A2 E3 C2 A2 E9 C2 A1 E4 C1 A1 E9 C2 A2 E4 C2 A1 E9 C3 A1
Details of the features of the system of supply designed to assist in the management of risks to the quality of the water identified in the risk management plan, including the method by which the effectiveness of these features is verified.	Regulation 6(1)(c)	Based on the details of the features of the system in the risk management plan and their knowledge of the system, the auditor will need to determine if the system is effective for management of the identified risks, and if the verification measures are appropriate.	E2 C1 A3 E3 C2 A1 E3 C2 A3 E4 C2 A1 E4 C4 A2 E9 C2 A1 E9 C2 A2

Auditable element	Legislative reference	Notes ^{9, 10, 11}	ADWG Framework for Drinking Water Quality Reference Element/ Component/Action
<p>In the case of a water supplier, details of the procedures for consultation with water storage managers and other water suppliers for the purpose of achieving agreement on the hazards and risks to quality of the water supplied–</p> <p>(i) to the water supplier by water storage managers or other water suppliers; and</p> <p>(ii) by the water supplier to other water suppliers.</p>	<p>Regulation 6(1)(d)(i) 6(1)(d)(ii)</p>	<p>The water supplier should be able to provide evidence of formal communication protocols and agreements that detail the arrangements for information transfer, consultation and other communication with relevant water storage manager.</p> <p>Minutes, documented outcomes and communications should be available as evidence.</p>	<p>E1 C3 A2 E1 C3 A3 E4 C2 A1 E4 C5 A1 (6(1)(d)(i) only E4 C5 A2 (6(1)(d)(i) only</p>
<p>Details of procedures and management systems for–</p> <p>(i) ensuring that the amount and purity of chemicals added to drinking water does not adversely affect the quality of that water or pose a risk to human health; and</p> <p>(ii) controlling any residue or chemical by-products imparted to drinking water as a result of the addition of chemicals to water supplied for drinking purposes.</p>	<p>Regulation 6(1)(e)(i) 6(1)(e)(ii)</p>	<p>The water business must have a procedure or process in place that allows them to be confident that the chemicals added to the drinking water supply are safe. A quality assurance program to verify the quality of chemicals can be administered by a chemical supplier or third party, with the water business holding the evidence.</p> <p>The control of the chemical residues and by-products at a safe level should be managed through the activities, supply features and associated verification measures described in the risk management process.</p>	<p>E4 C4 A1 E4 C5 A1 6(1)(e)(i) only E4 C5 A2 6(1)(e)(i) only</p>
<p>Details of emergency management arrangements and procedures for dealing with an incident, event or emergency that may adversely affect the quality or safety of drinking water, or result in water being supplied that poses a risk to human health, including–</p> <p>(i) the names and contact details of, and the positions held by, the persons responsible for dealing with such an incident, event or emergency; and</p> <p>(ii) methods for communicating or disseminating information to the public in relation to any such incident, event or emergency.</p>	<p>Regulation 6(1)(f)</p>	<p>The water business will need to have in place emergency management procedures for an event, incident or emergency, and these procedures will need to have the content required by regulation 6(1)(f).</p> <p>The context of regulation 6(1)(f) is the need for procedures to be in place to deal with emergencies, incidents or events, but the auditor may wish to inspect a selection of recorded incidents/events/emergencies and determine, where possible, whether the documented procedures were followed.</p> <p>Of particular note will be the process used for communicating or disseminating information to the public in relation to any such incident, event or emergency.</p> <p>If the debrief meeting for a particular incident/event/emergency identifies that the procedure requires modification, then there is expectation that the procedure will have been modified, as is required in section 7(1)(d) of the Act.</p>	<p>E4 C2 A1 E4 C3 A1 E4 C3 A2 E5 C4 A2 E5 C4 A1 E6 C1 A1 E6 C1 A2 E6 C2 A1 E6 C2 A2 E6 C2 A3</p>

Auditable element	Legislative reference	Notes ^{9, 10, 11}	ADWG Framework for Drinking Water Quality Reference Element/ Component/Action
Risks			
<p>(a) the risk to human health that arises from the presence in water of–</p> <ul style="list-style-type: none"> (i) pathogenic micro-organisms; and (ii) inorganic chemicals, including inorganic disinfection by-products; and (iii) organic chemicals, including pesticides, pesticide residues and organic disinfection by-products; and (iv) radiological parameters; and (v) algal toxins. 	Regulation 6(2)(a)(i) 6(2)(a)(ii) 6(2)(a)(iii) 6(2)(a)(iv) 6(2)(a)(v)	The evidence that the auditor will need to see will be that the hazards identified in regulations 6(2)(a) were addressed in the risk assessment required under section 9(1)(c) of the Act, and that appropriate preventive measures were put in place to address these risks, as is required by section 9(1)(d) of the Act.	E2 C3 A2 E2 C3 A3
<p>(b) The risks arising from an incident or event that may cause the organisms, substances and matters referred to in paragraph (a) to enter or be present in the system of supply of the water supplier or the water supplied by the water storage manager (as the case requires).</p> <p>(c) The risk of transfer of the organisms, substances and matters referred to in paragraph (a) in water being supplied by the water supplier or water storage manager (as the case requires).</p>	Regulation 6(2)(b) 6(2)(c)	The evidence that the auditor will need to see will be that the hazardous events identified in regulations 6(2)(b) and 6(2)(c) were addressed in the risk assessment required under section 9(1)(c) of the Act, and that appropriate preventive measures were put in place to address these risks, as is required by section 9(1)(d) of the Act.	E2 C3 A2 E2 C3 A3
Documentation			
The risk management plan	Regulation 7(a)	<p>The auditor will need to view and assess all documents that relate to the risk management process. A water business can title, refer to or link these documents in any manner that they wish, but during the audit, all required documentation must be available for inspection.</p> <p>Regulation 7(a) refers to the document described in section 9 of the Act, and it must contain the details and assessments required by section 9 and regulation 6.</p>	E10 C1 A1 E10 C1 A2

Auditable element	Legislative reference	Notes ^{9, 10, 11}	ADWG Framework for Drinking Water Quality Reference Element/Component/Action
<p>Any document or operating manual, procedure or protocol created pursuant to the risk management plan or containing material relating to the content of the risk management plan.</p>	<p>Regulation 7(b)</p>	<p>Regulation 7(b) refers to supporting documentation. These documents are described as being operating manuals, procedures or protocols. It is likely that these will be the documents that contain the preventative strategies/measures required under section 9(1)(d) of the Act. The auditor will be required to view these documents, and ensure that if they contain preventative strategies/measures that they are appropriate to manage the identified risks.</p> <p>Additionally, if these operating manuals, procedures or protocols detail actions that are to be implemented, or they refer to actions that are to be undertaken under certain circumstances, then evidence must be available that the required actions are being taken.</p>	<p>E4 C1 A2 E4 C2 A2 E10 C1 A1 E10 C1 A2</p>
<p>Any training and competency manual relating to the responsibilities of the staff of the water supplier or water storage manager (as the case requires) to manage and deal with–</p> <ul style="list-style-type: none"> (ii) risks identified in the risk management plan; and (ii) emergencies, incidents or events that may adversely affect the quality of– <ul style="list-style-type: none"> (A) in the case of a water supplier, drinking water; (B) in the case of a water storage manager, the water supplied or to be supplied. 	<p>Regulation 7(c)(i) 7(c)(ii)(A) 7(c)(ii)(B)</p>	<p>Regulation 7 (c) deals with training. There is an expectation that training and/or competency manuals will be in place. As detailed in regulation 7(c)(i) & 7(c)(ii), the information in the training/competency manual must relate or be relevant to the operating manuals, procedures or protocols detailed in regulation 7(b) (i.e. the risks identified in the plan), or emergency management.</p>	<p>E7 C2 A3 (7(c)(i) only) E10 C1 A1 E10 C1 A2</p>

References

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