# **Drinking Water Quality Management Plan**

**Review and Audit Guideline** 

**June 2019** 





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## 1. Introduction

Drinking water quality is regulated in Queensland under the Water Supply (Safety and Reliability) Act 2008 (the Act). The primary aim of the drinking water provisions in the Act is the protection of public health through the provision of safe drinking water. To best achieve this, drinking water service providers ('service providers') must have an approved Drinking Water Quality Management Plan (DWQMP) that demonstrates how they manage the quality of drinking water they provide to communities.

The intent of the DWQMP is:

- to document the service provider's risk-based system for managing the quality of drinking water
- be a living document that reflects the requirements of the service provider and be actioned through the service provider's day to day activities now and into the future.

Under the Act, the chief executive of the Department of Natural Resources, Mines and Energy (DNRME) is responsible for the assessment and approval of the DWQMPs produced and submitted by service providers. Developed by DNRME, this Review and Audit Guideline ('the guideline') incorporates feedback obtained through stakeholder engagement activities and has been issued by the chief executive, pursuant to section 571 of the Act. The guideline provides information to service providers and auditors about Queensland's statutory requirements for regular reviews and audits of approved DWQMPs. The guideline contains:

- a process that service providers can use to comply with the requirement to review their DWQMPs
- information to assist service providers to understand their role in relation to the audit process
- information for auditors about DWQMP audits, their role and on developing an audit report

This guideline (June 2019) supersedes previous versions. The Act prevails to the extent of any inconsistency between this guideline and the Act.

## 2. Reviews and audits

The approved DWQMP is a 'living document' and must be regularly reviewed to ensure it remains relevant in regard to the operation of the water service provided and audited to assess the service provider's compliance with the DWQMP and its conditions. Service providers must undertake reviews and arrange the audit of their approved DWQMP as two separate activities. Both activities contribute to the continuous improvement of the approved DWQMP (refer to Figure 1).



Figure 1 Overall process for effective DWQMP implementation

## 2.1 Reviewing your approved DWQMP

The purpose of reviewing your approved DWQMP is to ensure the plan remains relevant to the operation of the water service you provide to your customers.

A review is undertaken typically every two year and is an assessment of the approved DWQMP to ensure it is

- accurate and up-to-date;
- appropriate to managing risks to the supply; and
- functioning and working well.

A review needs to be thorough, consider all aspects of the approved DWQMP and be undertaken with involvement of all relevant internal staff.

In contrast, an Audit assesses and verifies a service provider's compliance with the approved DWQMP and is completed at least every four years. Audits are:

- undertaken by someone other than the service provider (i.e. a third party who has not been involved in preparation, implementation and review of the DWQMP);
- limited by scope;
- · objective and impartial; and
- reports findings based on sampled information and data.

**Note:** Section 106(1) of the Act requires a service provider to regularly review the service provider's approved DWQMP in accordance with the notice given by the regulator in section 99 of the Act. Section 99 of the Act requires, amongst other things, that the regulator must state in a notice of decision or information notice, the interval at which regular reviews of the approved DWQMP must be conducted. Where the interval must not be less than 1 year and, if the regulator requires audits of the approved DWQMP, the intervals at which audits must be conducted which must not be less than 2 years.

There are significant benefits for service providers who undertake these activities. These benefits are listed in the boxes below, with the protection of public health being the primary aim.

#### Key benefits of undertaking an effective review include:

- evaluates drinking water quality management practices and processes
- checks the accuracy and currency of the information stated in the approved DWQMP
- ✓ assesses new risks threatening the production and distribution of safe water
- evidence of compliance with the regulatory requirement on undertaking regular reviews
- maintains the confidence and support of staff and stakeholders in the DWQMP approach
- √ demonstrates a culture of continuous improvement
- ✓ informs operations and capital works budgets

#### Key benefits of undertaking an audit include:

- √ identifies key improvements and/or gaps
- ✓ provides independent opinion on performance relating to the approved DWQMP
- implementation of the findings reinforces and strengthens internal practices and quality control measures
- enhances credibility and reliability in the information provided to stakeholders, including customers and the regulator
- evidence of compliance with the regulatory requirement on undertaking audits
- provides assurance to stakeholders on quality of water supplied through appropriate management of risks
- demonstrates a culture of continuous improvement
- ✓ results can support business cases on investments and improvements.

## 3. Undertaking a review

This section provides information to assist service providers to comply with the regulatory requirements for conducting regular reviews and responding to report findings.

## 3.1 The purpose of a review

#### Act requirement:

The purpose of a review is to ensure the plan remains relevant having regard to the operation of the water service provided by the service provider.

A DWQMP can quickly become out of date and less relevant if it is not reviewed and updated. For example, by not incorporating:

- newly identified hazards and hazardous events that may affect the risk assessment and the quality of the water
- catchment, treatment and distribution changes in the schematic or process diagrams, which can impact on the risk assessment
- improvement program implementation, which can impact on risk assessment outcomes
- revised operational procedures
- revised processes, for example, following incidents to ensure that they do not recur
- · newly identified improvements
- staff changes
- stakeholder changes

## 1. Review due dates and responsibilities

Service providers must regularly review their DWQMP at the intervals stated in the most recent approval notice (e.g. the latest notice of decision or information notice) provided to them following approval of their most recently submitted version of their DWQMP. If the review and audit dates for the DWQMP coincide, the review should be conducted following the audit of the DWQMP. This will enable the findings and recommendations of the audit to feed into the review process.

A DWQMP must remain relevant, meaning it must represent the water services provided. As such, a DWQMP may need to be reviewed earlier than the interval stated in the approval notice, and is particularly true when significant changes or events have occurred. For example when a water source is acquired or stopped, new treatment infrastructure has been commissioned, major process improvements have been implemented or after a critical water quality incident has occurred. In cases where an incident or event results in needing some time to determine the most adequate and suitable management approach to address the risk on a longer term basis, contact the regulator to clarify the expectations regarding the timing of the DWQMP review that will bring the DWQMP up to date with all the changes.

A review is normally conducted internally by a service provider's management and operational staff. All sections of the DWQMP must be reviewed. The review team should meet to review all aspects of the DWQMP to ensure that the content is still accurate (i.e. reflects the on-ground circumstances) and relevant (i.e. appropriate to manage water quality risks). It is considered best practice to include local operator input and a site visit.

Service providers may choose to engage external experts to assist them facilitate the review process.

#### 3.2 3.3 How to undertake a review

A review of the approved DWQMP must be conducted in accordance with the notice of decision or information notice given to service providers by the regulator when approving the DWQMP. The primary focus of the review should be to ensure the approved DWQMP is relevant, accurate and current having regard to the operation of the water service provided by the service provider. Service providers may wish to use the guidance provided in Appendix A – DWQMP Review Guidance, prepared by the department to facilitate their review.

Aspects to consider in a review include, but are not limited to:

- management and operation of the drinking water service, including changes in the catchment, supply system and process flow diagrams or schematics
- procedures and processes
- risk assessment, including identified hazards, hazardous events and preventive or control measures
- monitoring programs (operational and verification)
- implementation of improvement actions identified in the risk management improvement program (RMIP)
- performance of process controls and verification monitoring results
- outcomes of incident and emergency investigations and responses
- water quality related customer complaints
- audit results
- any concerns from the regulator or changes to regulatory and formal requirements

This list is not exhaustive and is not intended to be a review structure that is appropriate to all service providers. Box 1 provides an example on how to use the questions in the *DWQMP Review Guidance* (Appendix A).

#### Box 1 Review Example - Details of infrastructure for providing the service

**Question:** Do the schematics accurately reflect all the components, processes and linkages, from catchment to consumer?

The review team (or a sub-group of it) should walk-through the supply system from the intake point at source to the final product (water treatment plant outlet). The catchment, distribution and each treatment step, including chemicals dosed, dosing locations and monitoring points and parameters should also be considered.

The review team must assess whether the schematic in the DWQMP is current and accurate. If there has been a change then assess the potential impacts from the change. For example, dosing of chlorine in the clarifier has been added as an additional process. This may contribute to the potential formation of disinfection by-products as chlorine is added prior to filtration. The risk assessment must include this hazard and hazardous event. The monitoring plan will need to be adjusted to allow for verification testing of disinfection by-products (which could be through the testing for trihalomethanes as an indicator).

This change to process is a significant change and so the DWQMP will need to be updated and an amendment application made (section 3.5.2). The team should assign who is responsible for undertaking this action and the timeframe for completing it. The timeframe for submission of the amended DWQMP is 30 business days from the review date.

## 3.4 Maintaining records of a review

Service providers should retain records of DWQMP reviews. These records should capture the date of the review and who was involved. The records should also capture any decisions made during the review that identifies the required improvements to the DWQMP. These records may be used by auditors or the regulator to verify that reviews were undertaken at the intervals specified in the approval notice. The template in Appendix A can be used to record the review.

#### 3.2 3.5 Outcome of a review

Following a review, the DWQMP will require changes; or, be considered relevant and accurate with no changes required. Sections 3.5.1 to 3.5.3 describes the actions that must be completed based on the outcome of the review.

#### 3.5.1 Changes to the DWQMP (with regulator agreement)

A review may identify changes the service provider considers as minor, requiring only small corrections to be made in the DWQMP. Examples of minor changes may include:

- changes to the current and projected populations, connections and demand
- updated details of stakeholders, names, key personal, organisational structure
- additional details of infrastructure that have no impact on the quality of water
- updated operation and maintenance procedures list, provided that the changes to the procedures do not impact on the risk assessment outcomes
- updated risk management improvement program where there is no change to the risk assessment as a result of completing actions in the improvement program.
- changes to the information management, record keeping and reporting processes.

Generally, if the proposed changes affect the quality of water or adversely change the risk profile of the service, these will unlikely be considered minor and require an amendment application to be made.

However, if a change is minor, service providers should seek, in writing, the regulator's agreement to make the changes to the DWQMP. To do this, it is suggested service providers send an email to the regulator detailing the proposed minor changes. The regulator will decide whether the changes are minor and if so, request the service provider to submit the amended DWQMP with minor changes in tracked form. All correspondence can be emailed to: <a href="mailto:drinkingwater.reporting@dnrme.qld.gov.au">drinkingwater.reporting@dnrme.qld.gov.au</a> or submitted via the DNRME lodgement system.

The regulator will review the changes and, if agreed, a letter will be sent to the service provider advising the changes to the DWQMP have been agreed. The changed DWQMP then becomes the approved version.

If the regulator does not agree that the changes are minor in nature, the service provider will be notified and advised to make an application to amend the DWQMP under s100 of the Act. Section 3.5.2 provides more details regarding significant changes to the DWQMP after a review.

Service providers can contact the regulator by email if they are unsure whether changes to the DWQMP are considered significant or minor. For more details on submission and approval of amendment applications, refer to <a href="https://www.dnrme.qld.gov.au">www.dnrme.qld.gov.au</a>. Search for "DWQMP amendments" to guide you to the relevant webpages.

## 3.5.2 Significant changes to the DWQMP

A review of the DWQMP may identify significant changes that need to be made. Examples of significant changes include, but are not limited to:

- changes to the infrastructure or service area, e.g. new scheme, new source of water, upgrade
  to intake infrastructure, new reservoirs before treatment plant or installation or removal of pre
  oxidation, which has not been described in the approved DWQMP
- changes to the treatment/disinfection process, e.g. type of disinfection or location or addition of a new treatment plant
- new hazards identified in a catchment or source water (e.g. PFAS)
- new hazardous event identified
- · changes to the risk assessment
- changes to the operational monitoring and verification monitoring linked to risk assessment or new data available.

If the changes to be made are significant, an amended DWQMP must be submitted to the regulator for approval. This must occur within **30 business days** of completing the review. An application form must also be included and is available at <a href="https://www.dnrme.qld.gov.au">www.dnrme.qld.gov.au</a>. Search for "DWQMP amendment form" to guide you to the relevant form.

Once a complete application has been received by the regulator, it will be assessed and if approved the amended DWQMP becomes the approved DWQMP and a new approval notice is issued to the service provider.

#### 3.5.3 No change to the DWQMP

If a review does not identify the need for changes to the DWQMP, the only action required is to report the findings of the review in the relevant DWQMP report (see section 3.5.5).

### 3.5.4 Continual improvement

Some identified changes to the management and operations of the drinking water service may require medium to long-term actions. Service providers must include these actions in their RMIP within the

DWQMP. Information the service provider has added to the *DWQMP Review Guidance* template (Appendix A) (if used) can be transferred directly to the RMIP.

Incorporating these actions into the RMIP will enable monitoring of change as well as demonstrate a continual improvement process of the DWQMP.

## 3.5.5 DWQMP (annual) report

Service providers must include the outcomes of their DWQMP review (conducted that year) in the DWQMP (annual) report of the financial year to which it relates. This includes how the matters raised in the review have been addressed or are being addressed.

The requirements for annual reports under the Act can be found in the DWQMP Report guidance note on the department's website at <a href="www.dnrme.qld.gov.au">www.dnrme.qld.gov.au</a>. Search for "DWQMP report' to guide you to the relevant guidance material.

#### 3.5.6 Senior and executive management

The commitment and ongoing involvement of the highest levels of the organisation (for example, the Chief Executive Officer, Council or board members) are essential to the continual improvement activities relating to drinking water quality and the drinking water service.

Senior management are required to accept the level of residual risk in the DWQMP's risk assessment and commit to implementing appropriate short and long term measures to minimise the risk particularly if residual risks are high. For this reason senior and executive management should be kept informed of the review outcomes, including the changes/improvements identified and budgetary implications, as relevant.

#### 3.23.6 Checklist

The following checklist is a guide to assist service providers ensure all steps that are relevant to the review process have been completed.

| Re | view checklist  |  |
|----|---|--|
| 1. | Review has been undertaken within the required timeframe (section 3.2)  |  |
| 2. | The review has checked the relevancy of the DWQMP in regard to the operation of the water service (section 3.3)   |  |
| 3. | A record of the review has been captured and retained (section 3.4)   |  |
| 4. | The DWQMP has been amended and submitted to the regulator within 30 business days of the completion of the review, if relevant (section 3.5.1 and section 3.5.2)          |  |
| 5. | Findings from the review have been included in the DWQMP RMIP, outlining who is responsible for each action and timeframe for implementation, if relevant (section 3.5.4) |  |
| 6. | The outcomes of the review have been included in the DWQMP (annual) report (section 3.5.5)  |  |
| 7. | Senior management have been informed of outcomes of the review by their relevant team (section 3.5.6)   |  |

## 4. Undertaking an audit

This section provides information to assist service providers and auditors to comply with the regulatory requirements for audits and subsequent actions to undertake following the audits.

## 3.2 4.1 The purpose of an audit

The purpose of an audit is to verify data accuracy, assess compliance with the DWQMP and its relevance.

Auditing is an integral part of the DWQMP process. It must be carried out by someone other than the service provider (i.e. third party who has not been directly involved in the development, implementation and review of the approved DWQMP).

Audit results should feed into the ongoing review process and further development and implementation of the DWQMP.

## 3.2 4.2 Role of the service provider

## 4.2.1 Audit due dates and engaging an auditor

Service providers must carry out audits of their DWQMP by the due date and at the frequency stated in the most recent approval notice. The results of the audit should feed into the ongoing review process.

The service provider is responsible for appointing the auditor. Service providers must engage auditors well before the due date of the audit to ensure it is completed within the allocated timeframe. As a recommendation, auditors should be appointed a minimum of three months prior to the audit's due date.

Under the Act, service providers must give the auditor and any person employed or authorised by the auditor free and uninterrupted access to the service provider's infrastructure and any records relating to the infrastructure. Service providers should ensure their key personnel will be available onsite on the audit day/s and provide true and accurate information to the auditor. On the day/s when the audit is being undertaken all relevant documents must be made available for the auditor to inspect (e.g. approved DWQMP, data, records, reports, etc. that demonstrate implementation of the DWQMP).

Service providers must arrange for auditors with appropriate certification with Exemplar Global to conduct their audits. Exemplar Global manages a certification scheme for WQMS auditors, which establishes an Australia-wide certification for auditors with competence in the area of drinking water risk management systems. For further information including the names of certified auditors, refer to Exemplar Global's website: <a href="http://exemplarglobal.org">http://exemplarglobal.org</a>

The auditor selected must have appropriate qualifications to undertake the audit. The appropriately qualified auditor must be a person or persons independent of the activity being audited, free from bias and conflicts of interest, and able to maintain an objective view to ensure the findings are based only on the audit evidence. The Act states that the audit report must not be prepared by:

- an employee of the service provider, or
- someone who is employed in operating the service provider's infrastructure.

The auditor must adhere to the code of conduct related to their auditor certification; refer to ISO19011:2018 Guidelines for auditing management systems.

If the proposed auditor does not hold the appropriate certification through Exemplar Global, the service provider must contact the regulator prior to engagement and commencement of the audit.

Additionally the service provider is to:

- review the audit report and resolve any misunderstanding or inaccuracies with the auditor in a timely manner to ensure it does not impact on the submission timeframe for the final audit report
- 2. then accept the findings of the audit and obtain senior or executive statutory declaration
- 3. organise for the auditor to submit the final audit report accompanied by the executive's statutory declaration and the auditor's declaration.

These additional activities are described in further detail in section 4.4 of this guideline.

#### 3.24.3 Role of the auditor

The auditor should give the service provider adequate notification prior to requiring access to infrastructure and records.

Auditors are to record evidence to justify their determinations, such as details of the approved DWQMPs, records viewed, whom they spoke to and infrastructure/scheme components sighted. Auditors will use a mix of evidence that is appropriate to the situation; consider auditable elements (section 4.3.1) and the scheme circumstances. It may not be practical for the auditor to, for example, sight all records or visit all infrastructure. Audit findings are usually based on a sample of available information.

#### 4.3.1 Scope, criteria and auditable elements of the audit

Scope - the audit must:

- verify accuracy of monitoring and performance data given to the regulator under the plan
- assess the service provider's compliance with the DWQMP and its approval conditions
- assess relevance of the DWQMP to the drinking water service

**Method** – Audits must be undertaken on site. Where a service provider has multiple schemes, the service provider must determine with the auditor the number of and specifically which schemes are to be audited. Over several audit cycles, all schemes are to be audited.

**Out of scope -** The auditor is not required to assess compliance of the service provider's DWQMP against the criteria in the statutory DWQMP guideline. This is assessed by the regulator as part of the DWQMP approval process.

**Timeframe –** Implementation of the DWQMP must be assessed for all versions of all DWQMPs approved since the last audit.

**Criteria** - These are the key documents against which the audit evidence is assessed to determine compliance. The criteria are:

- the service provider's approved DWQMPs, including referenced documents which collectively form the approved DWQMPs
- approval notice issued to the service provider by the regulator.

**Auditable elements** - These are the requirements in the DWQMP, which the service provider must be able to demonstrate to the auditor in order to show that they have complied with the legislative obligations (within the scope of the audit). The auditable elements to be assessed are outlined in Table 1.

Table 1 Auditable elements

| Elements to be audited    | Details of the assessment for each element  |
|---------------------------|---|
| Data accuracy             | The auditor must verify the accuracy of the monitoring data given to regulator as outlined in the approved DWQMP. This should include, but is not limited to:   |
|                           | verification data generated as per the approved DWQMP   |
|                           | data provided in the DWQMP (annual) report  |
|                           | data provided to the regulator as part of a periodic reporting condition.   |
|                           | For example for the auditor to verify the data he/she could compare the laboratory data for a specific period of time with data in the service provider's records over the same period.   |
| Compliance with the DWQMP | The auditor must assess the service provider's compliance with the approved DWQMP. This should include, but is not limited to:  |
|                           | the implementation of preventive measures for managing hazards and<br>hazardous events (including those applied in the<br>distribution/reticulation network) as described in the DWQMP  |
|                           | the implementation of operational and maintenance procedures     (including instrument calibration) as referenced and/or described in the     DWQMP, including availability and currency of the procedures  |
|                           | the implementation of the process for managing incidents and<br>emergencies as described in the DWQMP, including reporting<br>requirements to the regulator   |
|                           | the implementation of the operational (including critical control points, as relevant), and verification monitoring programs as described in the DWQMP  |
|                           | the implementation of the risk management improvement program or improvement DWQMP as described in the DWQMP  |
|                           | whether the service provider is maintaining records, using the systems described in the DWQMP   |
| DWQMP conditions          | The auditor must assess the service provider's compliance with the DWQMP conditions. This should include, but is not limited to, assessment of whether the service provider is:   |
|                           | <ul> <li>reporting incidents in relation to events that are beyond the control of<br/>the service provider and have the potential to impact public health and<br/>for failing to meet water quality criteria as defined in the approval<br/>notice, and whether preventative measures taken were adequate to<br/>control the hazard.</li> </ul> |
|                           | adhering to provisions and conditions of the approval notice.   |

| Elements to be audited | Details of the assessment for each element   |
|------------------------|--|
| Relevance              | The auditor must assess the DWQMP's relevance to the service provider's drinking water service. This should include, but is not limited to, assessment of whether the:   |
|                        | <ul> <li>service description and details of infrastructure (including process flow<br/>diagrams, ) in the DWQMP reflect the current circumstances for each<br/>scheme</li> </ul>   |
|                        | <ul> <li>catchment characteristics and water quality information in the DWQMP<br/>reflect the current circumstances for each scheme</li> </ul>   |
|                        | <ul> <li>risk assessment and risk management measures (including choice of<br/>critical control points and limits) in the DWQMP reflect the current<br/>circumstances for each scheme, including the outcomes from any<br/>incident management which required a change to the preventive<br/>measures and from implementation of the RMIP program</li> </ul> |
|                        | <ul> <li>operational and verification monitoring in the DWQMP reflect the<br/>current circumstances for each scheme.</li> </ul>  |

## 4.3.2 During the audit

The audit is considered completed when the auditor has finalised the audit report, and both the auditor and service provider have signed their respective statutory declarations (refer also to section 4.3.4).

If an auditor finds a noncompliance that is likely to have an imminent and serious adverse impact on public health, he/she must inform the regulator as soon as possible. Details of the facts and circumstances that gave rise to the non- compliance will be sought by the regulator.

The regulator can be contacted via the incident hotline, 1300 596 709 and in writing via email at drinkingwater.reporting@dnrme.gld.gov.au

## 4.3.3 Audit report

The auditor must prepare an audit report that clearly expresses the opinion of the auditor in respect of the findings of the audit. Refer to section 4.4.1 for submission timeframe.

The audit report must include:

- the name of the auditor, name of the service provider and water service being audited, the approval date of the DWQMP being audited and the date the audit report was completed
- the methodology used to conduct the audit, for example, the audit team, audit agenda, documents, records and any other evidence used to assess compliance
- field assessment date(s)
- · completion of audit date
- the assessment of accuracy of data provided to the regulator
- the assessment of compliance with the DWQMP and its conditions
- the assessment of relevance of the DWQMP as it currently exists
- identification of any non-compliance
- opportunities for improvement and/or recommendations for the service provider

## 4.3.4 Signed statutory declarations

The audit report must be accompanied by two statutory declarations. These are:

- a statutory declaration from the service provider, which is signed by the service provider's
  executive officer if the service provider is a corporation, or signed by the service provider if the
  service provider is an individual, and
- 2. a signed statutory declaration from the auditor.

The service provider's declaration must state that the service provider:

- has not knowingly given any false or misleading information to the auditor
- has given all relevant information to the auditor.

The auditor's declaration must:

- state the auditor's qualifications and experience relevant to the audit
- state that the auditor has not knowingly included any false, misleading or incomplete information in the report
- state that the auditor has not knowingly failed to reveal any relevant information or document to the regulator
- certify the report addresses the relevant matters for the evaluation and is factually correct
- certify the opinions expressed in it are honestly and reasonably held.

Appendix B contains **example templates** of statutory declarations that can be used to meet these requirements. Online templates can be accessed from the Queensland Courts website www.courts.qld.gov.au.

#### 3.2 4.4 Outcome of the audit

The actions that are undertaken by both the service provider and auditor once the audit is completed are explained in this section.

#### 4.4.1 Submitting the report

Before submitting the audit report, the auditor should discuss the report findings with the service provider and resolve any misunderstandings or inaccuracies in a timely manner to ensure it does not impact on the timeliness in submitting the final audit report.

The auditor must submit the audit report along with the two signed statutory declarations (one by the auditor and one by the service provider) within 30 business days after the audit is completed.

Submission through email is preferred at drinkingwater.reporting@dnrme.qld.gov.au.

#### 4.4.2 Action plan and continual improvement

Where the audit report identifies any noncompliance(s), the regulator may request an action plan from the service provider following review of the audit report. Service providers should develop an action plan outlining responsibilities, timeframes and the action(s) to undertake to address the noncompliance(s). Implementation of some actions in the action plan may require medium to long-term timeframes.

Service providers should include these actions in their RMIP, enabling the implementation to be monitored as continual improvement.

### 4.4.3 Audit report availability

The service provider must keep a copy of the audit report available for inspection by the public during business hours at their office, and at other places, the service provider considers appropriate. The service provider must also make a copy of the audit report available for purchase at a reasonable cost.

## 4.4.4 DWQMP (annual) report

Service providers must include details of the audit findings and recommendations in their DWQMP report for the financial year of the audit.

The requirements for annual reports under the Act can be found in the DWQMP Report guidance note on the department's website at <a href="https://www.dnrme.qld.gov.au">www.dnrme.qld.gov.au</a>.

The commitment and ongoing involvement of the highest levels of the organisation (for example, the Chief Executive Officer, Council or board members) are essential to the continual improvement activities relating to drinking water quality. Therefore, they should be kept informed of the audit outcomes and budgetary implications, as relevant.

#### 4.4.5 Checklists

#### 4.4.5.1 Service provider checklist

The following checklist is a guide to assist service providers ensure all steps that are relevant to the audit process have been completed.

| Aud | dit checklist  |  |
|-----|--|--|
| 1.  | Audit has been undertaken within the required timeframe (section 4.2.1)  |  |
| 2.  | An appropriately qualified auditor has been selected and engaged (section 4.2.1)   |  |
| 3.  | Statutory declarations have been signed by the auditor and the senior executive (section 4.3.4)  |  |
| 4.  | Audit report has been submitted to the regulator by the auditor within 30 business days of the audit's completion along with the signed statutory declarations (see section 4.4.1) |  |
| 5.  | An action plan has been developed, where non-compliances have been identified in the audit report (section 4.4.2)  |  |
| 6.  | Audit report has been made available for public inspection (section 4.4.3)   |  |
| 7.  | Audit findings have been included in the DWQMP (annual) report (section 4.4.4)   |  |
| 8.  | Senior management have been informed about audit findings (section 4.4.4)  |  |

#### 4.4.5.2 Auditor checklist

The following checklist should be used by the auditor to ensure that all steps relevant to the audit are undertaken.

| Au | auditor checklist   |  |  |  |  |  |
|----|---|--|--|--|--|--|
| 1. | Declaration of any conflict of interest to service provider prior to engagement has been made (section 4.2.1)   |  |  |  |  |  |
| 2. | Undertaken the audit in accordance with this guideline (section 4.3.1)  |  |  |  |  |  |
| 3. | Informed the regulator immediately of any noncompliance that was likely to have had an imminent and serious adverse impact on public health (section 4.3.2) |  |  |  |  |  |
| 4. | Prepared an audit report in accordance with this guideline (section 4.3.3)  |  |  |  |  |  |
| 5. | Signed a statutory declaration (section 4.3.4)  |  |  |  |  |  |
| 6. | Submitted the report and signed statutory declaration within 30 business days of completing the audit (section 4.4.1)                                       |  |  |  |  |  |

## **Appendix A – DWQMP Review Guidance**

| Review date or period  |  |
|------------------------|--|
| Team members/positions |  |

| Areas to consider  | Yes<br>or No | Type of change positive/ negative /neutral | Action required<br>(consider changes to<br>risk assessment,<br>DWQMP document,<br>monitoring etc.) | Who will action? | Time-<br>frame |
|--|--------------|--|--|------------------|----------------|
| 3.6 Service description  |              |  |  |                  |                |
| Have any of the service provider contact details changed?  |              |  |  |                  |                |
| Do the scheme details still apply?   |              |  |  |                  |                |
| Have the number of communities serviced changed?   |              |  |  |                  |                |
| Has the population size changed?   |              |  |  |                  |                |
| Have the number of connections changed?  |              |  |  |                  |                |
| Is the design capacity sufficient for population projections?  |              |  |  |                  |                |
| 3.6 Details of infrastructure used for providing the service   |              |  |  |                  |                |
| Do the schematics accurately reflect all the components, processes and linkages, from catchment to consumer? |              |  |  |                  |                |
| Do any of the system description details require updating?   |              |  |  |                  |                |
| Have new chemicals been introduced into the treatment process or the dosing points relocated?                |              |  |  |                  |                |
| Have monitoring and telemetry systems been checked and/or changed?   |              |  |  |                  |                |

| Areas to consider  | Yes<br>or No | Type of change positive/ negative /neutral | Action required (consider changes to risk assessment, DWQMP document, monitoring etc.) | Who will action? | Time-<br>frame |
|--|--------------|--|--|------------------|----------------|
| Have low pressure areas in the distribution system changed?  |              |  |  |                  |                |
| Has a reservoir undergone refurbishment?   |              |  |  |                  |                |
| Have there been changes in the key stakeholders or engagement process?   |              |  |  |                  |                |
| Have there been any problems with infrastructure or equipment breakdown or deterioration?  |              |  |  |                  |                |
| 3.7.1 Information gathering on water quality and catchment characteristics   |              |  |  |                  |                |
| Water quality data should be collated, analysed and trended, including for source water, treatment process steps and distribution. |              |  |  |                  |                |
| • Have there been changes to the source water quality or characteristics?  |              |  |  |                  |                |
| Have there been any changes to the output quality?   |              |  |  |                  |                |
| • Does water quality data indicate that the level of risk has changed for certain hazards?   |              |  |  |                  |                |
| Has operational monitoring data identified any poorly functioning treatment processes?   |              |  |  |                  |                |
| Has there been any significant development or land use changes in the catchment?   |              |  |  |                  |                |
| Has the nature or frequency of any water quality complaints changed?   |              |  |  |                  |                |
| Has there been any occurrence of suspected illness following a customer complaint about water quality?                             |              |  |  |                  |                |
| 3.7.2 Hazard identification  |              |  |  |                  |                |
| Have the personnel (position) responsible for hazard identification and risk assessment changed?                                   |              |  |  |                  |                |

| Areas to consider  | Yes<br>or No | Type of change positive/ negative /neutral | Action required (consider changes to risk assessment, DWQMP document, monitoring etc.) | Who will action? | Time-<br>frame |
|--|--------------|--|--|------------------|----------------|
| Have any new or emerging hazards or hazardous events been identified?  |              |  |  |                  |                |
| 3.8 Assessment of risks  |              |  |  |                  |                |
| Is the risk assessment methodology still considered appropriate?   |              |  |  |                  |                |
| Have new risk management strategies been implemented?  |              |  |  |                  |                |
| <ul> <li>Do any new risk management strategies require new assessment of residual risk?</li> <li>Has an acceptable, residual risk level been clearly defined?</li> </ul> |              |  |  |                  |                |
| 3.9.1 Risk management measures   |              |  |  |                  |                |
| Have the existing risk management strategies achieved desired water quality outcomes?  |              |  |  |                  |                |
| Has the effectiveness of any new risk management strategies or infrastructure upgrades been evaluated?   |              |  |  |                  |                |
| 3.9.2 Operation and maintenance procedures   |              |  |  |                  |                |
| Do the procedures and practices reflect current operations?  |              |  |  |                  |                |
| Is there a need to create new operation and maintenance procedures?  |              |  |  |                  |                |
| Have records related to associated procedures been kept?   |              |  |  |                  |                |
| Have training records been maintained?   |              |  |  |                  |                |
| Is training appropriate to the system, as it currently exists?   |              |  |  |                  |                |
| 3.9.3 Management of incidents and emergencies  |              |  |  |                  |                |

| Areas to consider  | Yes<br>or No | Type of change positive/ negative /neutral | Action required (consider changes to risk assessment, DWQMP document, monitoring etc.) | Who will action? | Time-<br>frame |
|--|--------------|--|--|------------------|----------------|
| • Is the process for managing drinking water incidents and emergencies still appropriate for the drinking water service?                           |              |  |  |                  |                |
| Do internal and external communication process and protocols work effectively?   |              |  |  |                  |                |
| Is the list of people to be contacted during emergencies up to date?   |              |  |  |                  |                |
| Is staff training for incidents and emergencies up to date?  |              |  |  |                  |                |
| Have incident and excursion records identified changes in risks and hazards?   |              |  |  |                  |                |
| 3.9.4 Risk management improvement program (RMIP)   |              |  |  |                  |                |
| Review status of actions in the improvement program.   |              |  |  |                  |                |
| • Were actions in the program completed in the timeframe outlined in the RMIP?   |              |  |  |                  |                |
| • Did the program outlined in the DWQMP achieve the intended outcomes?   |              |  |  |                  |                |
| Does the program require updating to manage risks effectively, including measures for newly identified risks?                                      |              |  |  |                  |                |
| <ul> <li>Are all unacceptable risks included in the RMIP and do all of these risks have a remedial action<br/>item and completion date?</li> </ul> |              |  |  |                  |                |
| 3.9.5 Service-wide support information management  |              |  |  |                  |                |
| Are staff using current versions of documents?   |              |  |  |                  |                |
| <ul> <li>Are the information management, record keeping and reporting processes being used<br/>appropriately?</li> </ul>                           |              |  |  |                  |                |
| 3.10.1 Operational monitoring  |              |  |  |                  |                |

| Areas to consider   | Yes<br>or No | Type of change positive/ negative /neutral | Action required (consider changes to risk assessment, DWQMP document, monitoring etc.) | Who will action? | Time-<br>frame |
|---|--------------|--|--|------------------|----------------|
| Have changes to the infrastructure or process resulted in a need to revise the monitoring program?                |              |  |  |                  |                |
| Are the range and frequency of parameters being tested appropriate?   |              |  |  |                  |                |
| Are the established corrective actions and controls actively applied as in the DWQMP and still appropriate?       |              |  |  |                  |                |
| Have monitoring records been maintained?  |              |  |  |                  |                |
| Are monitoring equipment being calibrated?  |              |  |  |                  |                |
| 3.10.2 Verification monitoring  |              |  |  |                  |                |
| Have changes to the infrastructure resulted in a need to revise the monitoring program?                           |              |  |  |                  |                |
| Are the range and frequency of parameters being tested appropriate?   |              |  |  |                  |                |
| Are the established corrective actions and regulator notifications actively applied as described in the DWQMP?    |              |  |  |                  |                |
| Are the corrective actions and notifications still appropriate?   |              |  |  |                  |                |
| Have monitoring records been maintained?  |              |  |  |                  |                |
| Have ADWG health guideline values changed for any parameters?   |              |  |  |                  |                |
| Have the arrangements for monitoring, transport arrangement for off-site analysis, or testing laboratory changed? |              |  |  |                  |                |
| Other areas   |              |  |  |                  |                |
| Have there been any changes in regulations, legislation or formal requirements?                                   |              |  |  |                  |                |

| Areas to consider  | Yes<br>or No | Type of change positive/ negative /neutral | Action required (consider changes to risk assessment, DWQMP document, monitoring etc.) | Who will action? | Time-<br>frame |
|--|--------------|--|--|------------------|----------------|
| Have there been organisational structure changes that may impact on risk management? |              |  |  |                  |                |
| Are critical personnel appropriately qualified or require additional training?       |              |  |  |                  |                |
| Do the audit outcomes recommend changes to the DWQMP or related processes?           |              |  |  |                  |                |

## **Appendix B – Sample Statutory Declaration templates**

## 3.2 Statutory declaration by the auditor

Oaths Act 1867

**Statutory Declaration** 

#### **QUEENSLAND**

TO WIT

I, <<insert name of the auditor making the declaration>> of <<insert address>>, in the State of Queensland do solemnly and sincerely declare that:

I am certified under the Exemplar Global Drinking Water-Quality Management System Auditor Certification Scheme.

To the best of my knowledge, information and belief, I have not knowingly included any false, misleading or incomplete information in the report, not knowingly failed to reveal any relevant information or document to the regulator.

I certify that the report addresses the relevant matters for evaluation and is factually correct and that the opinions expressed in the report are honestly and reasonably held.

And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the Oaths Act 1867.

#### <<signature>>

Taken and declared at <<insert town or city and suburb where declaration signed>> this << insert date>> of <<insert month>> 20 <<insert year>>, before me

<<si>signature of person before whom the declaration is made – to be signed by a person who is able to witness a Statutory Declaration under the Statutory Declarations Act 1959 – e.g. Justice of the Peace, Commissioner of Declaration>>

Justice of the Peace/Commissioner for Declarations

## Statutory declaration by the service provider

Oaths Act 1867

#### Statutory Declaration

**QUEENSLAND** 

TO WIT

I, <<insert name of the person making the declaration on behalf of the service provider>> of <<insert address>>, in the State of Queensland do solemnly and sincerely declare that:

I am the <<insert position title of person authorised to sign this declaration on behalf of the service provider>> of <<insert provider's registered legal name and CAN/ABN number (if applicable>>.

Through the course of the regulator audit of the drinking water quality management plan (DWQMP) by <<insert name of auditor>> for the audit period ending <<insert year of audit>>; which has resulted in this regular audit report dated <<insert date>>; that officers and employees of <<insert service provider name>> have not knowingly given any false or misleading information. And have given all relevant information to the auditor who conducted the regular audit of the DWQMP mentioned above.

And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the Oaths Act 1867.

#### <<signature>>

Taken and declared at <<insert town or city and suburb where declaration signed>> this << insert date>> of <<insert month>> 20 <<insert year>>, before me

<<signature of person before whom the declaration is made – to be signed by a person who is able to witness a Statutory Declaration under the Statutory Declarations Act 1959 – e.g. Justice of the Peace, Commissioner of Declaration>>

Justice of the Peace/Commissioner for Declarations