

Drinking Water Quality Regulator for Scotland

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Water Industry (Scotland) Act 2002 Enforcement Notice Under Section 10 (1)

The Drinking Water Quality Regulator for Scotland (“the DWQR”), in exercise of the powers conferred by section 10(1) of the Water Industry (Scotland) Act 2002, hereby gives notice that he believes that Scottish Water is in contravention of Regulations 30 and 31 of The Public Water Supplies (Scotland) Regulations 2014 (“the Regulations”) as amended in relation to the risk assessment of each treatment works and connected supply system.

This notice shall take effect 15 days from the date of issue.

The recommendations listed in Annex 1 are from a DWQR audit of Scottish Water’s risk assessment system on the 12th, 13th and 14th May 2025.

Scottish Water is hereby required to carry out the following for all of its water treatment works and connected supply systems:

Ref	Activity	Completion date
<i>Delivery of the following measures by the dates specified in each case.</i>		
1.1	Action Plan Development - Risk Assessment Methodology and Review Scottish Water is required to submit an Action Plan to the DWQR, detailing how it shall ensure conformance with Recommendations 1 to 14 in Annex 1.	31 March 2026 <u>Completed</u>
1.2	Action Plan Development – Verification of Risk Scottish Water is required to submit an Action Plan to the DWQR, detailing how it shall ensure conformance with Recommendations 15 to 17 in Annex 1.	31 March 2026 <u>Completed</u>
1.3	Action Plan Development – Risk Reporting 1.3.1 Scottish Water shall define what constitutes a ‘significant risk’ from its risk assessment methodology in order to submit risk assessments reports required by Regulation 31(1). 1.3.2 Scottish Water shall submit an Action Plan to the DWQR which sets how it will conform with recommendations 18 and 19 in Annex 1.	31 March 2026 <u>Completed</u> 31 March 2026 <u>Completed</u>
1.4	Delivery - Risk Assessment Methodology Scottish Water to deliver activities in line with action plan, to achieve compliance with Recommendations 1 to 14 in Annex 1.	30 April 2028
1.5	Delivery – Verification Scottish Water to deliver activities in line with action plan, to achieve compliance with Recommendations 15 to 17 in Annex 1.	30 April 2028
1.6	Delivery – Reporting 1.6.1 Scottish Water to commence reporting of significant risk employing an interim process agreed with DWQR.	31 March 2026 <u>Ongoing</u>

	1.6.2 Scottish Water to commence reporting of risk (in line with 1.3.2) to achieve compliance with Recommendations 18 and 19 in Annex 1.	30 April 2028
1.7	Submission of risk assessment methodology to DWQR for approval. On completion of improvement activity, Scottish Water to submit a summary document that demonstrates compliance of the risk assessment methodology to Regulation 30 (2B) (b) & (c).	30 April 2028
1.8	Reporting of progress against action plans (1.4, 1.5 & 1.6) Scottish Water to report progress of each action plan on a quarterly basis (March, June, September and December). A final completion report shall be delivered by 30 April 2028	Quarterly reporting of progress with a final completion report submitted by 30 April 2028



David Reynolds
Drinking Water Quality Regulator

ANNEX 1

Recommendation 1 - Scottish Water to ensure that its risk assessments are informed by operational staff.

Recommendation 2 - Scottish Water to reduce the data gaps in its risk assessments to minimise impact on risk reporting.

Recommendation 3 - Scottish Water to resolve the system error that results in conflicting information on availability of data.

Recommendation 4 - Scottish Water to update procedures to ensure that no asset or part of an asset is introduced to supply without first having a documented risk assessment aligned with the Water Supply Risk Management (WSRM) methodology.

Recommendation 5 - Scottish Water to improve its risk assessment process for iron, manganese and discolouration hazards.

Recommendation 6 - Scottish Water to calculate risk for hazards at each node of each of its supply systems, rather than just likelihood.

Recommendation 7 - Scottish Water to ensure that there is flexibility within the risk assessment methodology, to add site specific hazardous events across all nodes, regardless of whether hazardous event information is available or applicable for every asset across Scottish Water.

Recommendation 8 - Scottish Water to develop and implement risk methodology to ensure staff competence and training risks are assessed and managed.

Recommendation 9 - Scottish Water to ensure that updates to the WSRM risk assessments are made in a timely manner.

Recommendation 10 - Scottish Water to review catchment risk assessment methodology.

Recommendation 11 - Scottish Water to ensure that there is a process to ensure that all relevant risks to distribution systems that are identified by Scottish Water are added to WRAP, along with site specific distribution system risks.

Recommendation 12 - Scottish Water to modify documentation to ensure that discolouration risk can, where appropriate, become a significant risk, particularly in areas where there has been a history of discolouration.

Recommendation 13 – Scottish Water to develop and implement a process for the review and update of its risk assessments as soon as possible in the event that it becomes aware of any—

- (a) deterioration of the quality of the water;
- (b) increase in the pollution of a body of water or other source used for the abstraction of the water; or
- (c) modification to, or extension of, the combined system from which the water is supplied, which is relevant for the protection of human health and was not previously taken into account.

Recommendation 14 – Scottish Water to ensure that all issues identified within TOMS and DOMS audits are addressed, with risks added to the WSRM risk assessments where required.

Recommendation 15 – Scottish Water to ensure that it has a robust verification process to make use of its regulatory and operational water quality monitoring to ensure compliance with Regulations 30(2A)(a)(i), 30(2A)(a)(ii), 30(2A)(b)(i), 30(2A)(b)(ii), 30(2B)(b), and 30(2B)(c).

Recommendation 16 – Scottish Water to take account the results of monitoring under section 8 (monitoring) of the Water Environment and Water Services (Scotland) Act 2003 in respect of bodies of water identified under section 6 of that Act (bodies of water used for the abstraction of drinking water).

Recommendation 17 – Scottish Water to reflect consumer contact data in its verification process.

Recommendation 18 – Scottish Water to report significant risks to DWQR.

Recommendation 19 – Scottish Water to provide statements for its supply systems (or any part of its supply systems) where risk assessment establishes that there is no significant risk.

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