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Your ref:  
Our ref: B2075368  
1 May 2008

## Information Letter 3/2008

Dear Mr Brown

### Reporting Significant Drinking Water Quality Events and Incidents to DWQR

#### Purpose

1. This letter provides further guidance on the requirements of the Drinking Water Quality Regulator for Scotland (DWQR) with regard to the reporting of water quality events and incidents by Scottish Water. This letter complements IL 2/2008 on "Priority" event reporting and takes into account revised DWQR requirements for incident reports. This letter supersedes IL 1/2004 on the reporting of events and incidents.

#### Background

2. The Event reporting system is well established, whereby Scottish Water is required to report any significant failure or occurrence affecting drinking water quality as soon as possible to DWQR and other stakeholders using an event form template. Additional information is provided once it becomes available using updates and outcome forms. Once all information is received, DWQR may assess a more severe event as an incident, and require further information from Scottish Water within 28 days to be provided in an incident report.
3. IL 2/2008 described the process for "Priority" event reporting whereby Short-term Health Risk Action Values (SHRAVS) are to be used to enable less significant failures of the prescribed concentration or value for certain parameters to be reported to DWQR in a monthly data return rather than individually. It is expected that Scottish Water will continue to investigate all failures regardless of when the notification is provided to DWQR. Failures above the SHRAV threshold, and other events considered by Scottish Water to be of significance to water quality, such as treatment process failures, will be "Priority" events and continue to be reported to DWQR as they occur. **Annex A** contains a flow chart to summarise this process.

The guidance in paragraph 5 of IL 1/2004 on types of event to be notified to DWQR remains valid.

4. DWQR has become concerned about the late provision of incident reports and event outcomes by Scottish Water. In 2007 and the early part of 2008, 31 out of 41 Scottish Water incident reports were submitted to DWQR after the 28 day deadline. Whilst an extension of the deadline had, in most cases been agreed, DWQR considers that Scottish Water should be able to provide the required information on incidents within 28 days, except in exceptional circumstances. Additionally, a small but significant number of event outcomes from 2007 were provided much later than expected, and in some cases remain outstanding. Consequently, DWQR has decided to reiterate the expected timescales for event and incident reporting, taking account of “Priority” event reporting outlined in IL 2/2008.
5. This letter also provides further clarification on the information Scottish Water is required to provide in incident reports. The provision of the specified information will ensure that DWQR has sufficient information to fully investigate and assess each incident.

### Timescales for the Provision of Outcome Information

6. It is acknowledged that outcome information is generally provided in a timely manner by Scottish Water, and provided that it is received within a week or so of the conclusion of the event this does not impede the ability of DWQR to assess the event. Significantly late submission of outcome information does however cause inconvenience to all parties. Consequently, **DWQR requires that outcome information is provided within 14 days of water quality being restored following an event.** Where this is not possible due to exceptional circumstances, an update should be provided within this deadline containing the reason for the delay and notifying when the outcome will be available.
7. DWQR will aim to classify a “Priority” event within two working days of receipt of the outcome information. If the event has been classified as an incident, DWQR will inform Scottish Water of this via an email to the Regulation mailbox, identifying whether an incident report is required or whether sufficient information has been provided within the event information. It is unlikely that DWQR will require a full incident report following review of the “Non priority” event data received each month, although DWQR may have further queries where insufficient information on the event has been provided in the data return.

### Timescales for the Provision of Incident Reports

8. **Where an incident report has been requested from Scottish Water it will be submitted to the DWQR mailbox ([regulator@dwqr.org.uk](mailto:regulator@dwqr.org.uk)) and copied to the relevant DWQR inspector within 28 days of the request.** This time period is consistent with other UK drinking water regulators and should be sufficient for Scottish Water to complete its own internal investigations and document them in a report.
9. Where Scottish Water’s investigations cannot be completed within the 28 days, either because of the complexity of the incident or because additional information is required from third party studies (e.g. epidemiological reports), DWQR may be prepared to grant an extension. Staffing issues or delays within Scottish Water’s internal “sign-off” process will not be accepted as valid reasons for an extension. All applications for extensions must be submitted in writing to the DWQR mailbox and copied to the relevant DWQR inspector. A condition of granting an extension may be the provision of interim reports at specified intervals advising DWQR of progress with Scottish Water’s investigation.
10. Late submission of incident reports without good reason will be communicated in DWQR’s annual report.

## Content of Incident Reports

11. **Annex B** sets out the information required in Scottish Water's incident reports. This list is in addition to the information required for event reporting and is not exhaustive. Scottish Water may wish to include extra information as appropriate to the circumstances of the incident. This information supersedes Annex B of IL 1/2004.

## Further Information and Enquiries

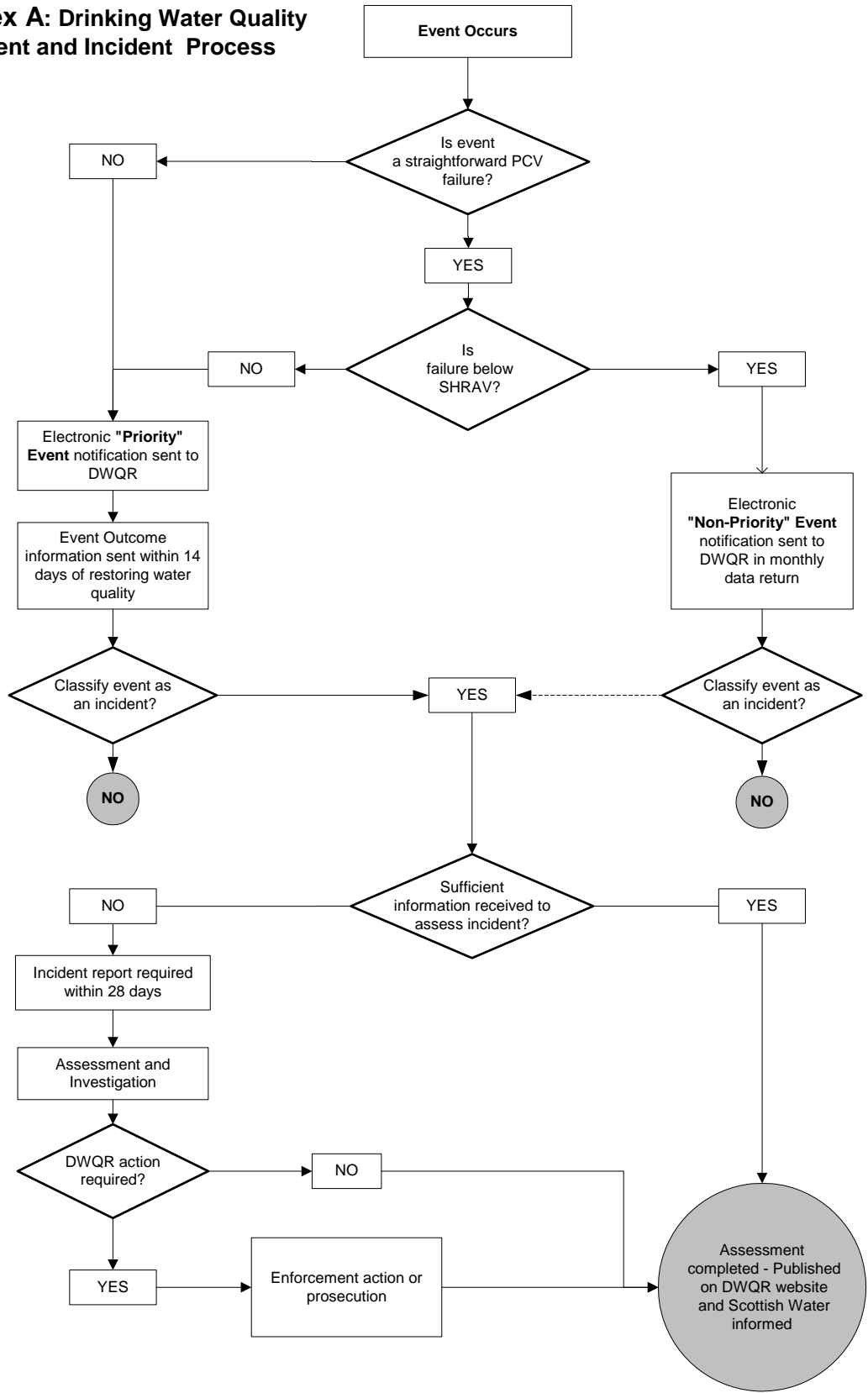
12. Enquiries about this letter should be addressed to Matthew Bower (Tel No: 0131 244 0743). Please acknowledge receipt of this letter.
13. Copies of this letter have been sent to Dr Colin Ramsay, Health Protection Scotland, Consultants in Public Health Medicine in each NHS Board area and Environmental Health contacts in local authorities.

Yours sincerely



Colin McLaren  
Drinking Water Quality Regulator for Scotland

# Annex A: Drinking Water Quality Event and Incident Process



## Annex B: Information to be Provided in an Incident Report

1. An **Executive Summary** that sets out the main points of the incident, including actions arising with timescales - in simple terms and in a stand-alone format.
2. A general **background** to the asset or area affected, including:
  - a. A suitable scale plan or extract from an OS map to show the location of the source, the water treatment works (WTW) and any other relevant information such as the supply zone(s) and the location of service reservoirs.
  - b. A copy of the WTW schematic, together with a brief description of the process.
  - c. For distribution events: a clear, annotated plan of the affected distribution system, showing direction of flow and valving arrangements.
3. A comprehensive description of **events and actions taken**, in chronological order, setting out events leading up to the failure or occurrence, remediation measures, steps taken to protect and limit the affect on consumers, and to restore supplies to normal.
4. A **discussion** section, expanding on the description of events to explain the causes, also the reasoning behind operational decisions taken;
5. **Public Health** issues, including details of liaison with Scottish Water's Public Health Team and subsequent:
  - a. Liaison with external bodies such as CPHM / EHO, including advice received;
  - b. Details of all consumer contacts received in association with the incident (plotted on a map if appropriate);
  - c. Details of all sampling and results of analysis undertaken in response to the incident (on-site and laboratory), both to establish the affect on water quality during the incident and to demonstrate that water quality has been restored following the incident, sample locations plotted on a map if appropriate;
  - d. Details of any samples taken by third party bodies such as local authorities;
  - e. Details of any alternative supplies issued, together with the number of any vulnerable consumers in the area affected;
6. **Supplementary Information**, including where appropriate:
  - a. Copies of any relevant extracts from the operations manual for the WTW in question;
  - b. Copies of records of routine maintenance for relevant assets;
  - c. Suitably annotated photographs of the works or individual pieces of equipment;
  - d. Staff training records, where relevant;
  - e. Copies of relevant risk or impact assessments carried out prior to any work;
  - f. Copies of any relevant procedures or work instructions;
  - g. Any relevant trends from SCADA or telemetry, clearly annotated to indicate scale and date / time. These should also cover the 48 hour period leading up to the event;
  - h. OMC Flight Desk logs showing times alarms were received and passed out to operations (including recipient);
  - i. Any media statements released in connection with the incident;

7. **Conclusions**, identifying root causes of the incident;
8. **Lessons Learned / Actions** being taken to prevent a recurrence or to improve operational responses, including action owner and timescales. Actions should be applied across Scottish Water, where this is appropriate.