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Dear Douglas

Information Letter 3 /2014

Update on DWQR Requirements for the Reporting of Water Quality Events

1. Purpose

The purpose of this letter is to update Scottish Water on DWQR's requirements for the reporting of events relating to drinking water quality. This letter expands on the requirements of ILs 3 / 2012 and 4 / 2012 and does not supersede them. The letter additionally informs Scottish Water of the approach DWQR will be taking to the assessment of events and regulatory compliance.

2. Introduction

2.1 The reporting of events affecting drinking water quality by Scottish Water is a well-established process in Scotland and, in the main, works effectively. In 2012 DWQR introduced priority event reporting whereby Scottish Water is only required to report the most serious events to DWQR immediately, with other events reported by the 21st of the month following that in which they are concluded. This process is working well and has now been extended to include reporting to other stakeholders.

3. Triggers for Event Notification

3.1 The triggers for notification are clearly set out in Information Letter 3/2012, and these have not changed. The opportunity is taken here to remind Scottish Water of a number of scenarios where reporting is required yet it is felt Scottish Water's current approach to event reporting has not consistently met these requirements:

3.1.1 *Significant Numbers of Complaints about Water Quality*

This requirement is in Section 5e.iv of IL 3/2012. DWQR requires to be notified of any situations where large numbers of consumer contacts are being received about a water quality issue. The decision as to trigger numbers of consumer contacts rests with Scottish Water, but DWQR should be notified in writing of these trigger values by 21 April 2014.

3.1.2 *All Failures of Regulatory Samples*

This requirement is in Section 6a of IL 3/2012. In order to fulfil its regulatory role and meet the requirements of the Drinking Water Directive, DWQR must assess individual failures of the regulatory standard. Consequently it is vital that Scottish Water reports every regulatory sample failure to DWQR via the agreed process. A separate event notification should be generated for every failure of a regulatory standard.

3.1.3 *All detections of Cryptosporidium in final waters*

Section 5d requires significant numbers of *Cryptosporidium* oocysts detected in a supply where this was unusual to be reported as a Priority Event. Section 7 requires all other detections to be reported as a Non-Priority Event. Consequently *all* detections of *Cryptosporidium* in final waters, together with investigatory information, should ultimately be sent to DWQR via the event reporting process.

3.3 Scottish Water's reporting to other stakeholders such as local Authorities and Health Boards should mirror the requirements of this information letter and IL 3/2012, but in any case it is expected that any event notification to these stakeholders will also be reported to DWQR.

3.4 Scottish Water has been reporting some events that DWQR neither requires to be reported nor considers relevant in assessing compliance or risk to public health. These include raw water *Cryptosporidium* detections and presumptive microbiological results. Whilst Scottish Water might need an operational response to these occurrences, these scenarios should not be included in the event reporting process unless there is reason to believe one of the notification criteria in IL 3/2012 has been met.

4. Content of Notifications

4.1 Whilst acknowledging improvements already made, there are areas where the content of the information provided by Scottish Water in response to an event could improve further. As a general rule, the information presented in an event notification should set out to present the history of the event in a logical fashion. For Regulatory sample failures, this information will be used during our compliance assessment to inform our decision regarding triviality of the exceedence. Obvious questions arising from the notification should be anticipated, with information to satisfy these included within the notification as far as possible. DWQR acknowledges that events vary in severity and significance and expects the level of detail and effort with an event notification to be scaled accordingly.

4.2 This information letter aims to provide additional guidance on the particular areas of event reporting DWQR considers to be requiring attention:

4.2.1 *Timeliness of reporting*

It is expected that the majority of non-priority events will be resolved to enable them to be reported in the data return due on the 21st of the following month. In the minority of cases where resolution is not possible within this timescale, it is acceptable for Scottish Water to report the event with the scheduled future actions that are to be taken to resolve it. It should be understood that should resolution not be achieved, and water quality continue to be adversely affected, the event must be reported to DWQR again with a full explanation.

4.2.2 *Population Information*

An assessment of the number of people affected by the event is required for all events. In some cases, for example where an event occurs at a treatment works, this could be a whole water supply zone. For others, the event may be known to affect a DMA, a street or only one property. It is acknowledged that the assessment of population affected may be an estimate and may need to be updated as more information about an event becomes known and is reported via an event update.

4.2.3 *Root Cause*

Scottish Water should try to identify the root cause of any event, plus any additional exacerbating factors. Such an assessment should clearly identify the element of any asset or procedure which was deficient or missing in order to enable the event to occur. It should be noted that factors such as heavy rainfall in the catchment are not acceptable as root causes. In such cases the root cause lies in the inability of the treatment process to respond to the challenges, whether this is due to the lack of an appropriately robust treatment process or an inadequate operational response. Following reporting of the event, DWQR will make its own assessment of root cause, based on the available information.

In the case of a *Cryptosporidium* detection at a treatment works having a process which should present an effective barrier, the detection should not be treated as routine and all aspects of the circumstances surrounding the detection should be investigated, making reference to industry best practice as set out in the reports by the Groups of Experts under Badenoch and Bouchier. In such cases, the scope of the investigation carried out should be summarised in the event notification, together with any pertinent findings.

4.2.4 *Actions to be Taken*

Where appropriate, any actions to be taken by Scottish Water in order to recover from an event or prevent a recurrence should be clearly set out in the event notification. For more significant events it is expected that such actions will be present.

4.2.5 *Event Outcome*

There should be a clear statement in the notification of the root cause findings for every event that it is the Final Outcome Notice.

5. DWQR Approach to Event Categorisation

5.1 It may be helpful to explain the process followed by DWQR in categorising an event notification received from Scottish Water. The initial notification and subsequent updates are reviewed by the DWQR officer for awareness purposes and in case any immediate action is required. Upon receipt of the outcome notification the event will be classified according to hazard type and root cause. The event is then assessed using a scoring system according to hazard severity and its likely impact on public confidence in the water supply. A matrix is used to produce an overall risk score and category. There are five categories ranging from "Not Significant" to "Major". The highest three of these categories, "Significant", "Serious" and "Major" are declared as incidents by DWQR and investigated accordingly.

5.2 DWQR is keen that the event categorisation process is as transparent as possible, and will aim to supply Scottish Water with a monthly report stating the category of events received. For every regulatory sample failure reported to DWQR, an assessment will be made as to whether or not the failure can be considered trivial. This information will be recorded and reported to Scottish Water.

6 A copy of this letter will be sent electronically to The Water Industry Commission for Scotland and Dr. Colin Ramsay, Health Protection Scotland.

Yours sincerely



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Drinking Water Quality Regulator for Scotland