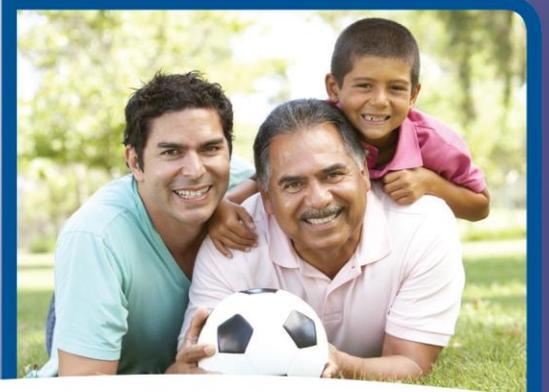
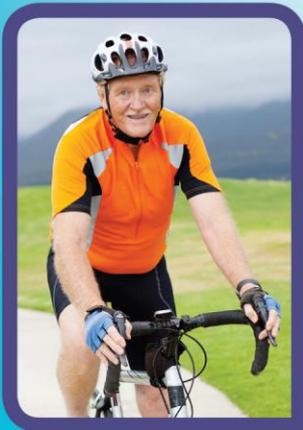


Audits of Drinking Water Quality Management Plans

Guidance Note



Issue: Version 8

November 2015

The Tasmanian Department of Health and Human Services would like to acknowledge the Victorian Department of Health for their help preparing the audit framework and associated documents; particularly the *Drinking Water Regulatory Audit Guidance Note – Edition 4* (May 2013).

Contents

1. Introduction	3
Scope.....	3
2. The Audit Process.....	4
Auditor Application and Approval.....	4
DWQMP Audit.....	4
Compliance Plans and Compliance Reports.....	5
3. Roles and Responsibilities for DWQMP Audits.....	6
Public and Environmental Health – DHHS.....	6
Regulated Entity	6
The Auditor	7
4. Audit Timing.....	8
5. Auditor Application	8
Application Form	8
Auditor Skills and Qualifications.....	8
Conflict of Interest.....	8
Auditor Approval.....	9
6. Penalties under the Public Health Act 1997.....	10
7. Scope of the Audit.....	11
Extent of the Audit	12
Audit Schedule	13
Fluoridation.....	13
8. Assessing and Reporting Compliance.....	14
Site Assessments/Inspections.....	14
Compliance	14
Non-Compliance.....	15
9. Compliance Plans	17
10. Compliance Reports	18
11. Audit Process and Reporting.....	18
Audit Report.....	18
Audit Activity	18
Audit Exit Meeting	18
Submitting the Audit Report.....	19
12. Departmental Public Health Officers.....	20

13. Further Information	20
Appendix A – Auditor Application Form	21
Water Quality Auditor - Application	22
Appendix B – Conflict of Interest Declaration Form.....	25
Water Quality Auditor – Conflict of Interest Declaration	26
Appendix C – Legislative Scope – Auditable Elements	28
Appendix D – Departmental Public Health Officer Contacts.....	31
Appendix E – Legislative Scope – Auditor Requirements	32

I. Introduction

The *Public Health Act 1997* (the Act) established the *Tasmanian Drinking Water Quality Guidelines* (TDWQG) has the primary objective of protecting public health through the provision of safe drinking water.

The TDWQG are fully aligned with the *Australian Drinking Water Guidelines* (ADWG) ensuring that a risk based approach is taken to the management of drinking water supplies.

It should be noted that the TDWQG are legislatively enforceable under the Act and hence compliance is mandated.

Section 7 of the TDWQG established under Section 129B of the Act require the regulated entity (TasWater) to prepare, implement and review Drinking Water Quality Management Plans (DWQMP).

Under Section 8 of the TDWQG, the regulated entity must have their DWQMP audited externally every two years.

The audit is a systematic and independent examination of the DWQMP to determine:

- the extent to which the plan complies with the requirements of the Act and the TDWQG
- the appropriateness of the Plan having regard to the drinking water supply system
- the extent to which the plan is being implemented
- if the plan has been reviewed and where appropriate revised
- if the control measures identified in the plan are in place operationally and adequate to control risks to drinking water safety.

Scope

The aim of this Guidance Note is to:

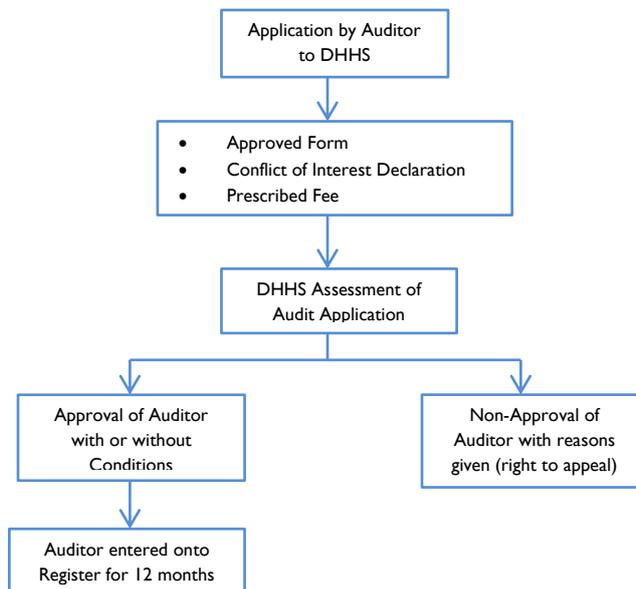
- provide additional information about the DWQMP audits to all stakeholders; including TasWater
- provide guidance to approved auditors
- ensure there is consistency in the assessment and reporting of audit findings.

It is the Act and the TDWQG that must be complied with. This guidance note has been developed to help in the interpretation of the Act and the TDWQG.

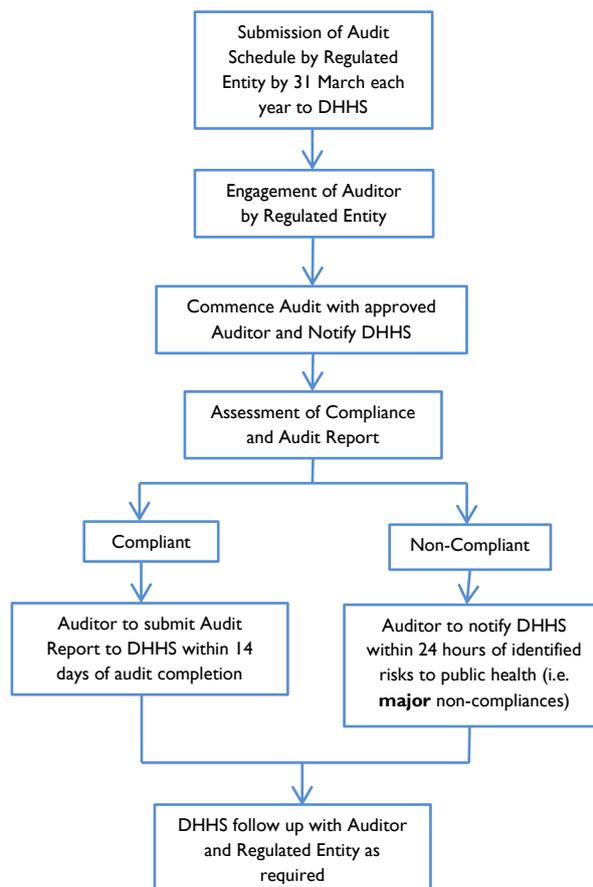
It also provides and insight into the Department's expectations about compliance with the risk management obligations imposed by the Act and the TDWQG.

2. The Audit Process

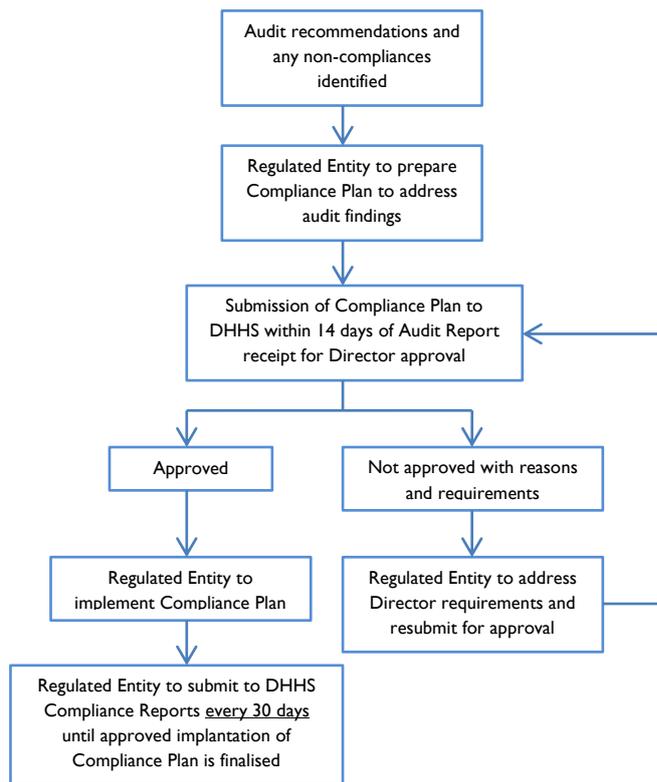
Auditor Application and Approval



DWQMP Audit



Compliance Plans and Compliance Reports



3. Roles and Responsibilities for DWQMP Audits

Public and Environmental Health – DHHS

The role of the Public and Environmental Health Unit of Public Health Services within the Department of Health and Human Services (DHHS) is to implement and monitor compliance with the *Public Health Act 1997* and the *Tasmanian Drinking Water Quality Guidelines* (TDWQG) and to report to the Director of Public Health on any drinking water quality issues within Tasmania.

The specific role of DHHS in relation to audits of DWQMP is to ensure that the audits are conducted in accordance with the Act and TDWQG and provide support mechanisms to:

1. Establish and maintain processes to approve water quality auditors.
2. Maintain a register of approved water quality auditors that will be made publically available.
3. Specify conditions attached to an approval of an auditor.
4. Establish any conflicts of interest that the auditor may have in performing their duties.
5. Determine that the timing and frequency of audits meets the two-yearly requirement.
6. Define the scope of the audit.
7. Define the criteria for assessment and reporting of the audit.
8. Review audit findings and require the preparation of a compliance plan(s) by the regulated entity.
9. Approve the contents and implementation of the compliance plan(s).
10. Review compliance reports.
11. Establish a process to manage complaints or disputes between auditors and the regulated entity.
12. Establish criteria for publication of details of audits in the Department's Annual Drinking Water Quality Report.

Regulated Entity

The role of the regulated entity is to manage risks in relation to the supply of drinking water to the public and ensure that drinking water is safe and complies with the requirements of the Act, the TDWQG and the ADWG.

The role of the regulated entity in relation to DWQMP audits is to:

1. Meet the requirements of the *Public Health Act 1997*, the *Tasmanian Drinking Water Quality Guidelines* and the ADWG.
2. Provide an audit schedule to DHHS every year, due by 31 March outlining the extent of the DWQMP audit and the proposed auditor for each audit.
3. Ensure that the approved auditor is engaged directly by the regulated entity and undertakes their duties within the required timeframe and meets their reporting responsibilities.
4. Ensure that all documents required by the water quality auditor are available and facilitate access to relevant sites.
5. Advise the Director of Public Health when an audit has been completed.
6. Work with DHHS to ensure the audit findings, including recommendations and non-compliances, are acted upon.
7. Submission of a compliance plan(s) to address the audit findings.
8. Submission of compliance reports to update the Department of implementation of the compliance plan.

9. Undertake the audits at their own expense.
10. Disclose the audit findings in their proceeding annual report.
11. Review and revise as necessary the DWQMP.

The Auditor

An auditor is responsible for auditing the DWQMP to determine if the plan is compliant with the legislative requirements and to gain objective evidence of the implementation of the plan.

The audit must be completed by the date specified in the Audit Schedule, and cover the period from when the last audit was undertaken.

The auditor must:

1. Meet the requirements of the audit application process.
2. Ensure that any conditions of approval are complied with.
3. Assess if the DWQMP meets the legislative requirements.
4. Assess if there is objective evidence of the implementation of the plan.
5. Notify the Director of Public Health within 24 hours of becoming aware of a potential threat to public health.
6. Notify the Director of Public Health upon completion of the audit activities prior to the finalisation of the audit report.
7. Provide completed audit reports to the Director of Public Health within 14 days of completion of the audit.

4. Audit Timing

Section 8 of the TDWQG requires that a DWQMP is subject to an audit every two years from the date in which the Plan is first endorsed by the Chief Executive Officer of the regulated entity. The timing of the audit is determined by the regulated entity in the preparation of their Audit Schedule which is submitted to the Director of Public Health outlining when certain aspects of the Plan will be audited within the two year requirement.

5. Auditor Application

Only approved auditors can conduct audits of DWQMP. Under Section 129C of the Act, an auditor can apply to the Director of Public Health for approval. The process for approval is based on a set of criteria that ensures the auditor is appropriately skilled and qualified and that they have no conflicts of interest that would impact on their ability to objectively conduct the audit.

Application Form

An application to become an approved auditor must be made on the approved Application Form contained in Appendix A. A completed Conflict of Interest Declaration contained in Appendix B must also be completed and the application needs to be accompanied by the prescribed fee.

Auditor Skills and Qualifications

There are no formal requirements for auditors to be certified under National or International certification frameworks. When considering an auditor's skills and qualifications, the Director of Public Health will base their assessment on Section 36 of the TDWQG, which outlines the required competency criteria as follows:

1. A degree in engineering, science or medicine **and**
2. At least seven years of experience in two of the following areas:
 - a. water industry – either as an employee or consultant **or**
 - b. establishing, reviewing or running systems for quality management, environmental management, risk management or Hazzard Analysis and Critical Control Points (HACCP) **or**
 - c. undertaking audits of systems for quality management, environmental management, risk management or HACCP **and**
3. Experience in the development of DWQMP and the implantation of the ADWG **and**
4. Suitable references and audit reports

Conflict of Interest

Under Section 37 of the TDWQG, the following are considered to be conflicts of interest:

1. Has been employed by the regulated entity in the last two years; either as an employee or a consultant. Undertaking previous DWQMP audits is not seen as a conflict of interest.
2. Has been involved in preparing, reviewing, implementing or revising a DWQMP.
3. Will be assisted in conducting the audit by a person who has a conflict of interest.
4. Has a personal bias likely to affect their decisions in relation to conducting and audit.

Auditor Approval

Approval of auditors remains current for 12 months from the date of approval – after which time the auditor must apply to the Department again for approval. The process for approval of auditors requires the applicant to submit the following:

1. Application form.
2. Conflict of interest declaration.
3. A log of previous audits undertaken.
4. Current CV/résumé.
5. The prescribed fee.

The required forms can be found on the Department's website (www.dhhs.tas.gov.au) and are contained in Appendix A and B of this Guidance Note.

Completed application forms must be submitted to:

State Water Officer

Department of Health and Human Services

GPO Box 125

HOBART TAS 7001

Note the submission of application forms can only be made by post so that the prescribed fee can accompany the application. Any application submitted by email will be returned to the auditor without assessment or commentary.

The Department will provide written confirmation of an auditor approval to both the auditor and the regulated entity identifying:

1. The auditors name and contact details.
2. The aspects of the DWQMP that they are approved to audit.
3. The duration of the approval.
4. Any conditions imposed on the auditor.

Under Section 129C of the Act, if the Director of Public Health refuses to grant an approval, details of the refusal will be provided in writing to the auditor and the regulated entity. Sections 129D and 129E of the Act allow for the Director of Public Health to vary, suspend and cancel an auditor's approval at any time during the approved period.

Auditors that have their approval varied, suspended or cancelled have a right of appeal in the Magistrates Court (Administrative Appeals Division) and are responsible for instigating this process within 28 days of the decision.

6. Penalties under the Public Health Act 1997

There are penalty provisions for the water quality auditor and TasWater for non-compliance with the requirements of the *Public Health Act 1997* and/or the *Tasmanian Drinking Water Quality Guidelines 2015*.

While care has been taken to provide guidance to water quality auditors and TasWater in this guidance note, each party is responsible for ensuring that all legislative requirements specified in the Act and the guidelines are complied with.

Specific information on which requirements have penalty provisions attached to them can be found in the *Public Health Act 1997*.

7. Scope of the Audit

Section 129B and 129F of the Act along with Sections 8 and 10 of the TDWQG contain information in relation to audits of DWQMP. It requires an auditor to examine the DWQMP:

- a. to the extent that it complies with the requirements of the Act and TDWQG
- b. the appropriateness of the plan having regard to the water supply systems that it manages.

It further requires an examination of:

- a. any provisions of the Act or guideline that have been contravened
- b. the extent to which the plan is being implemented.

Section 7 of the TDWQG details what the regulated entity must include in the DWQMP including mandating the requirement for the plan to be aligned with Elements 1-12 of the framework outlined in the ADWG. Broadly the auditable elements are:

- content of the risk management plan
- risk management assessment and activities
- identified risks to water supplies and appropriate control measures
- documented procedures
- objective evidence of implementation.

Additional guidance on the legislative scope of the audit can be found in Appendix C.

Additionally, the auditor should determine if the identified control measures and control measure combinations are in place operationally and are adequate to reliably control drinking water risks.

Critical control limit criteria should be in place and should be monitored, with corrective actions identified in the event of deviations from the target or critical control limit criteria.

Auditors are expected to look for a process for review and update of the plan and ensure that this is being implemented through continuous improvement practices.

The methods used in undertaking audits are the responsibility of the approved auditor and the Department understands there will be variation between methodologies adopted.

In accordance with best practice, it is expected that water quality auditors:

- determine if the DWQMP covers all aspects of the supply and provision of drinking water as related to that supply system
- obtain sufficient, reliable and relevant evidence to support the findings of the audit report
- be mindful of the water industry best practice management techniques and which apply to the DWQMP
- determine if the risk management process identifies all related risks including the legislative requirements
- consider the findings and corrective action implementation from previous audit reports and compliance plans.

It is expected that auditors adopt the scope of catchment-to-tap when conducting an audit and demonstrate an understanding of the regulated entity's business.

Extent of the Audit

TasWater's DWQMP is one document that contains an overarching framework of common elements to each drinking water supply system.

Under this common framework are detailed sub-plans for each of the drinking water supply systems under their management and control.

It is not the intention of the audit process to audit every single water supply system during each audit; however, there is an expectation on the auditor to select a representative number and type of drinking water supply systems to ensure that the DWQMP has been fully implemented.

The following guidelines should be applied when selecting the number and type of drinking water systems subject to the regulatory audit:

1. It is expected that the common framework be subject to an audit at every interval.
2. Type of treatment system. It is expected that the auditor select as a minimum three types of each supply distributed evenly over the three operating regions of TasWater. Essentially the types of drinking water systems can be defined as being either:
 - a. raw water supplies (i.e. no treatment)
 - b. disinfection only supplies
 - c. full treatment (in this case defined as one or more treatment barriers in addition to disinfection).
3. Regional Distribution. TasWater operates out of three distinct regions, and the selection of the type of system subject to the audit must be distributed over each of these regions.
4. Previous audits. Areas identified for significant improvement or requiring follow up from previous audits should be considered additionally to the minimum requirements for the number of systems selected.
5. Public health advisories, including boil water alerts and public health alerts.

It is expected that the minimum number of drinking water systems selected for an audit period would be **nine** giving consideration to a representative selection of the types of supplies, the regional distribution and the public health advisories (boil water alerts and public health alerts) operating at the time.

The water quality auditor should be guided by the approved audit schedule as prepared by TasWater.

There is no requirement to audit the implementation of the DWQMP during the one audit.

The requirement is that the audit period is every two years and it is satisfactory that the nine systems are done during that two-year period along with the common framework of the DWQMP.

If the audits are undertaken at different times during the two year period, there is an expectation that an audit report will be prepared after each audit activity.

This will allow for the timely completion of compliance plans and compliance reports as required by TasWater; which ultimately ensures non-compliances identified through the audit process are actioned appropriately.

Audit Schedule

The programming of the audits conducted over a two year period is at the discretion of TasWater and agreed to by the Director of Public Health through the submission of the Audit Schedule required by the TDWQG.

The audit schedule is required to be submitted each year by the 31 March and is designed to inform the Director of Public Health of what audits are planned for that next 12 month period.

If TasWater and the auditor meet the minimum requirements for auditing the DWQMP and the nine drinking water systems over a two-year period, then it will be deemed to have satisfied their legislative obligations regardless of when those audits take place.

Fluoridation

Where the addition of fluoride is undertaken for a water supply system, it is expected that the management of this is covered appropriately in the DWQMP; which then falls within the scope of the audit. Additional reference documents relevant to the regulation of fluoridation in Tasmania are:

1. The *Fluoridation Act 1968*.
2. The *Fluoridation (Interim) Regulations 2009*.
3. The *Tasmanian Code of Practice for the Fluoridation of Public Water Supplies in Tasmania 2014*.

Additional information and interpretation of these requirements can be discussed with the Department's state water officer.

8. Assessing and Reporting Compliance

To be assessed as compliant the water quality auditor must be satisfied that the DWQMP and its implementation fully complies with all obligations imposed by the Act and the TDWQG.

There must be evidence that each auditable element has been developed, has been implemented and is effective in achieving the desired outcome for the overall compliant result to be obtained.

Elements of an effective procedure or process include:

- a defined purpose
- a description of the operations
- assignment of responsibilities for actions and decision making
- identification of the records associated with the process
- key performance targets and measures of success
- reference documents.

A non-conformance with legislative requirements must be graded as either a **minor** or **major** non-compliance.

The overall result of the audit would be non-complaint; even if only one non-conformance is found during the audit.

The auditor is expected to examine and interrogate enough of the DWQMP and supporting implementation to satisfy themselves the regulated entity is or is not meeting their legislative responsibilities.

Site Assessments/Inspections

It is expected that the auditor visit the water supply locations in order to determine the extent of the implementation of the DWQMP and subsequent compliance with that Plan.

Compliance

Completion of the audit is defined when the auditor finishes their interrogation and site assessments of the DWQMP.

This then triggers the requirement for the water quality auditor to submit within 14 days to the Director of Public Health the finalised audit report.

This requirement is a condition against their approval.

A compliant grade can be assigned when each auditable element is present and has been implemented, and the auditor has examined enough evidence to be satisfied that the element, as written or implemented across the entire business is effective.

An auditor should assign a compliant grade and also identify opportunities for improvement.

Non-Compliance

A non-compliance can result from:

1. Implementation of a practice or measure that does not effectively address a risk identified in the DWQMP.
2. Failure to implement a practice that is identified in the DWQMP.
3. Failure to include a required element (ADWG or legislative) in the DWQMP.
4. Failure to implement the DWQMP across all water supply systems.

Following assessment of the DWQMP and implementation, the auditor must grade individual non-compliances as either **minor** or **major** based on an informed judgement on the potential risk to public health. The auditor must also recommend a **corrective action** against each non-compliance regardless of its grading.

A **major non-compliance** is defined as a non-compliance with one or more of the auditable elements, legislative requirements or risk management activities that has a serious or imminent risk or high potential risk to public health. That is, if the process or situation is allowed to continue, it is very likely to compromise the health of consumers.

In the event that the auditor identifies one or more **major** non-compliances, they are required to notify the Director of Public Health within 24 hours of becoming aware of the non-compliance. This requirement is detailed in Section 129F of the *Public Health Act 1997*.

The auditor is expected to provide enough level of detail on the reason(s) for their findings so that the regulated entity can enter into discussions with the Department and prepare a compliance plan(s) for submission to the Director of Public Health for approval.

A **minor non-compliance** is defined as a non-compliance with one or more of the auditable elements, legislative requirements or risk management activities unlikely to pose a serious or imminent risk to public health.

In the event that the auditor identifies one or more minor non-compliances, they are not required to notify these to Director of Public Health until they submit their audit report within 14 days after the completion of the audit.

The auditor is expected to provide enough level of detail on the reason(s) for their findings so that the regulated entity can enter into discussions with the Department and prepare a compliance plan(s) for submission to the Director of Public Health for approval.

Compliance Grade	Features	Auditor Actions	Regulated Entity Actions	Indicative DHHS Response
Compliant Result				
Compliant	Sufficient evidence to confirm that the Regulated Entity has undertaken, included and implemented all actions in accordance with the legislative requirements and their DWQMP	Complete Audit Report and submit to DHHS within 14 days of completion of audit	No specific action	No specific action
Non-Compliant Result				
Major non-compliance	Non-compliance where there is a serious, imminent or high potential risk to public health	Notify Director within 24 hours of becoming aware of non-compliance. Complete audit and Report for submission to Director within 14 days of audit completion	Liaise with DHHS and prepare a Compliance Plan for submission and approval by the Director within 30 days. Prepare Compliance Reports as required every 30 days.	Review and approve (or not approve) the Compliance Plan. Note and monitor implementation of Compliance Plan through Compliance Reports
Minor non-compliance	Non-compliance where there is not likely to be a serious or imminent risk to public health	Complete the audit and Report for submission to Director within 14 days of completing the audit	Liaise with DHHS and prepare a Compliance Plan for submission and approval by the Director within 30 days. Prepare Compliance Reports as required every 30 days	Review and approve (or not approve) the Compliance Plan. Note and monitor implementation of Compliance Plan through Compliance Reports

Recommendations for improvement can be made by the auditor against compliant findings as part of the continuous improvement framework.

This is designed to identify to the regulated entity opportunities that may exist to facilitate their undertaking of the legislative requirements.

The recommendation remains just that and the regulated entity has no requirement to adopt them unless required by the Director of Public Health.

9. Compliance Plans

Section 11 of the TDWQG requires the regulated entity to prepare and submit to the Director of Public Health for approval a compliance plan for any non-compliances identified during the audit and address the recommendations of the audit report.

The regulated entity has 30 days after receipt of the audit report to DHHS to submit a compliance plan to Director of Public Health for their consideration and subsequent approval.

In extenuating circumstances this length of time can be extended upon application to the Director of Public Health.

A shorter timeframe may be required if the non-compliances are determined to be of a significant nature.

Once a compliance plan has been approved by the Director of Public Health, the regulated entity is legally required to implement the plan and update the DWQMP as appropriate.

It is expected that the implementation of the compliance plan would form part of the next audit for that aspect of the DWQMP.

10. Compliance Reports

Section 12 of the TDWQG requires the regulated entity to prepare and submit a compliance report to the Director of Public Health every 30 days from the date from which the compliance plan is approved.

The compliance report is designed to keep the Director of Public Health updated on the implementation of the compliance plan. Compliance reports must be submitted until the compliance plan is fully implemented to the satisfaction of the Director of Public Health. The Director of Public Health has some discretion to vary the 30 day submission requirement upon application from the regulated entity.

11. Audit Process and Reporting

Audit Report

Auditors are required to prepare an audit report for each audit that they undertake. The audit report shall be provided to the regulated entity that commissioned the report.

As required by Section 10 of the TDWQG, the auditor will also provide a copy of the audit report to the Director of Public Health within 14 days of completing the audit. This will be a condition of approval against the auditor's application.

It is expected that the audit report contain sufficient detail to allow DHHS and the regulated entity to be able to understand, interpret and address the audit findings. Where an auditor recommends corrective action to address identified non-compliances, the recommendations should be succinct and outcome-focused.

The recommendations can include priorities; however, the final decision on priorities will be agreed between the regulated entity and the Director of Public Health through the approval of the compliance plan(s).

Where non-compliances have been identified, these should be presented in a summary table for ease interpretation and reference.

Audit Activity

Once the auditor has completed their audit component; that is their site investigations and assessment of documentations, they must notify the Director of Public Health that the audit process has been completed.

A phone call or email to the Department's state water officer is sufficient for discharging this obligation. This will be a condition of approval against the auditor's application. The auditor then has 14 days to complete and finalise their audit report prior to submitting it to the Director of Public Health.

Audit Exit Meeting

Prior to finalising the audit report, it is highly recommended that the auditor holds a closing meeting with the regulated entity to discuss the audit findings. This opportunity provides the mechanism to discuss any issues that may have arisen from the audit process. An exit meeting is also an

opportunity for the regulated entity to provide any documents and records that were not readily available to the auditor during the audit process.

It is acknowledged that the auditor and regulated entity may not agree on some aspects of the audit findings. This should not stop the auditor from finalising their report and submitting it to the Director of Public Health.

The regulated entity will enter into discussions with the Director of Public Health through the submission of a compliance plan, which will give them an opportunity to present their interpretation of the audit findings and propose their own appropriate corrective actions for implementation.

It is the approved compliance plan that must be implemented by the regulated entity and not the audit report; however the Director of Public Health will be largely guided by the content and rationale of the audit report.

Submitting the Audit Report

In accordance with Section 129F of the Act, the auditor must notify the Director of Public Health within 24 hours of becoming aware of a potential threat to public health (ie a major non-compliance). Failure to do so has legislative penalty provisions attached to it. It is a strict legislative requirement, and as such time extensions are not possible.

If there are no identified threats to public health (i.e. only minor non-compliances or no non-compliances) then the auditor is required under Section 10 of the TDWQG to submit the final audit report to the Director of Public Health within 14 days of the completion of the audit.

The Director of Public Health has discretion to extend the time frame upon application from the auditor.

The request for an extension needs to be made to the Director of Public Health prior to the expiration of the 14 day requirement.

The audit report can be submitted either by post or by email at the following addresses:

State Water Officer

Department of Health and Human Services

GPO Box 125

HOBART TAS 7001

Attention of the state water officer via public.health@dhhs.tas.gov.au

All audit reports must be signed by the auditor and clearly identify all personnel that helped conduct the audit, including officers from the regulated entity that helped provide auditable information.

Audit reports submitted by email should be sent as a PDF attachment.

The Department will acknowledge receipt of all incoming audit reports with an email back to the auditor.

12. Departmental Public Health Officers

The *Public Health Act 1997* requires of the Director of Public Health various approvals, notifications and receipt of information.

The Director of Public Health has delegated these functions to authorised officers under the Act.

A reference to the Director of Public Health should be taken to mean a Departmental public health officer in the first instance.

The Departmental public health officer will involve the Director of Public Health as and when they are required. Contact details for Departmental public health officers are included in Appendix D.

The primary Departmental public health officer contact for regulatory audits of DWQMP is the state water officer.

13. Further Information

For further information, please contact the state water officer by email at public.health@dhhs.tas.gov.au or using the contacts provided in Appendix D.

Appendix A – Auditor Application Form

Water Quality Auditor - Application

Information requested in this form is collected under authority of the *Public Health Act 1997* section 129C. This information will be used to evaluate prospective auditor applications. Please refer to the *Tasmanian Drinking Water Quality Guidelines 2015* and the *Guide Note for Water Quality Auditors* to assist in the completion of this form. Applicants must ensure that the information provided is accurate and that it addresses the requirements set out in sections 36 and 37 of the TDWQG. The Department of Health and Human Services will handle information in line with privacy legislation; noting that section 129G requires certain information will be made publically available.

Water Quality Auditor Details

Auditor Name:			
Business Name:			
Position:			
Address:			
City:		Postcode:	
email:			
Phone:		Mobile:	

Water Quality Auditor Referees

Two referees must be provided.

Name	Association with Auditor	Contact Details

Water Quality Auditor Qualifications and Skills

Degree:	
Issued By:	
Year Obtained:	

Describe any other qualifications/certifications that you hold in a professional capacity that relates to an auditing function. For example: management systems training, auditing training and memberships of any professional organisations.

Outline your experience in the development of *Drinking Water Quality Management Plans* and the implementation of the *Australian Drinking Water Guidelines*.

Water Quality Auditor Experience

Indicate your experience against the following requirements specifying the length of time of your involvement:

Work Experience	Time (years)
Water Industry; either employed directly or as a Consultant.	
Establishing, reviewing or managing systems for Quality Management, Environmental Management, Risk Management or Hazard Analysis and Critical Control Points (HACCP)	
Undertaking audits of systems for Quality Management, Environmental Management, Risk Management or HACCP	

Scope of Water Quality Audit Application

Indicate the scope of water quality auditing that you are applying for by ticking the relevant box.

Audit Scope	Tick
TasWater's DWQMP common framework as it applies to the requirements of the Act and the TDWQG	
TasWater's DWQMP individual water supply systems as it applies to the requirements of the Act and the TDWQG and the DWQMP common framework	
Objective evidence of the implementation of the DWQMP	

Water Quality Auditor Supporting Information

Please ensure that the following information is appended to this application form.

	Applicant's current CV/résumé
	Audit Log – A list of audits undertaken by the applicant
	Conflict of Declaration Form
	Payment of the prescribed fee

Declaration

I

make this application to be registered by the Director of Public Health under the *Public Health Act 1997* as an approved Water Quality Auditor for the purposes of conducting audits of *Drinking Water Quality Management Plans*.

All information provided in this application is accurate and correct.

I acknowledge that I understand my roles and responsibilities contained in the *Public Health Act 1997* and the *Tasmanian Drinking Water Quality Guidelines* particularly surrounding notification and reporting requirements to the Director of Public Health.

Signed: _____

Date: _____

Please forward this completed application and required information to:

State Water Officer

Department of Health and Human Services

GPO Box 125

Hobart TAS 7001

Appendix B – Conflict of Interest Declaration Form

Water Quality Auditor – Conflict of Interest Declaration

To be an approved Water Quality Auditor by the Department of Health and Human Services requires the Director of Public Health under the *Public Health Act 1997* to establish if the Applicant has a conflict of interest in relation to carrying out their audit function. Section 37 of the *Tasmanian Drinking Water Quality Guidelines* specifies what constitutes a conflict of interest.

Water Quality Auditor Details

Auditor Name:			
Address:			
City:		Postcode:	
email:			
Phone:		Mobile:	

Conflicts of Interest

Declare any conflicts of interest that you may have in undertaking the role of a Water Quality Auditor of *Drinking Water Quality Management Plans*.

Declaration

I

Declare that:

- I do not have any personal bias or inclination which would in any way affect my decisions in relation to the water supplies or regulated entity being audited.
- I do not have any personal obligation, allegiance or loyalty which would in any way affect my decisions in relation to the water supplies or regulated entity being audited.
- I did not prepare or implement, review or revise the regulated entity's *Drinking Water Quality Management Plan* in relation to the supply of water (this excludes any audits undertaken on behalf of the regulated entity).
- I have not been employed by the regulated entity or former regional water corporations in the previous two years.
- No person of interest assisting me in the audit process has any conflict of interest.

Except as set out below:

I undertake to make a further declaration detailing any conflict, potential conflict or apparent conflict that may arise during the approved period. Should any conflict appear to compromise me, I agree to abstain from any related decision and contact the Department of Health and Human Services state water officer.

Signed: _____ **Date:** _____

Witness Name: _____

Signed: _____ **Date:** _____

Appendix C – Legislative Scope – Auditable Elements

The DWQMP must include measures, plans or procedures to address the requirements of the *Public Health Act 1997* and the *Tasmanian Drinking Water Quality Guidelines (TDWQG) 2015*. The following table aims to provide some guidance to the auditor across the requirements of the Act and the TDWQG as it relates to the responsibilities of the regulated entity. It is by no means exhaustive, and the auditor is encouraged to examine other relevant aspects of the Act and the TDWQG that do not appear in the table below in order to assess compliance with the legislative requirements.

Auditable Element	Comments	Reference
Risk assessment and management practices in accordance with Elements 1-12 of the ADWG	<p>Risk assessment and identification of management practices aligned with ADWG elements to be contained in DWQMP:</p> <ol style="list-style-type: none"> 1. Commitment to drinking water quality management 2. Assessment of the drinking water supply system 3. Preventative measures for drinking water quality management 4. Operational procedures and process control 5. Verification of drinking water quality 6. Management of incidents and emergencies 7. Employee awareness and training 8. Community involvement and awareness 9. Research and development 10. Documentation and Reporting 11. Evaluation and audit 12. Review and continual improvement 	<p>TDWQG 7(1) ADWG Chapter 3 TDWQG4(1) PHA 129A PHA 129B PHA 130(3) PHA 131(2)</p>
Coverage of all water supply systems	Are all water supply systems under the management and control of the regulated Entity included in the DWQMP and compliant with the required provisions	TDWQG 7(2)
Endorsement of the DWQMP	The DWQMP needs to be endorsed by the CEO of the Regulated Entity	TDWQG 7(3)
Review and revision of the DWQMP	Review and revision of the DWQMP on at least an annual basis	TDWQG 7(4)
Revised DWQMP	Within 4 weeks of DWQMP revision a revised copy to be provided to the Director that has been endorsed by the CEO of the Regulated Entity	TDWQG 7(5)
Implementation of the DWQMP	Objective evidence of the implementation of the DWQMP	TDWQG 7(6)
Variation of DWQMP by Director	The Director may require that the provisions of the DWQMP are varied. In these instances, the auditor should establish if these have been implemented	TDWQG 7(7)
Audit of DWQMP	Audits required of the DWQMP in accordance with the Act	TDWQG 8(1)

Auditable Element	Comments	Reference
	and TDWQG: <ol style="list-style-type: none"> 1. The entire DWQMP 2. The management and control of water to which the DWQMP relates 	
Audit frequency	Audits have been carried out at least every two years	TDWQG 8(2)
Audit scope of DWQMP	An audit of the DWQMP is an examination of: <ol style="list-style-type: none"> 1. The extent to which the DWQMP complies with the requirements of the Act and TDWQG 2. The appropriateness of the plan having regard to the drinking water supply system 	TDWQG 8(3)
Audit scope implementation	An audit of the management and control of the water to which the DWQMP relates is an examination of: <ol style="list-style-type: none"> 1. As to whether any provisions of the Act or TDWQG have been contravened 2. Of the extent to which the DWQMP is being implemented 	TDWQG 8(4)
Audit schedule	An audit schedule has been prepared and submitted to the Director each year by 31 March outlining the program for audits in the coming two years	TDWQG 9(1)(2)
Compliance Plan	Compliance Plans have been prepared and approved by the Director to address previous audit findings or issues identified by the Regulated Entity as being non-compliant with the Act or the TDWQG. Details to be included in the Compliance Plan: <ol style="list-style-type: none"> 1. Section 11(2) of the TDWQG 2. Submission to the Director 30 days after receipt of the audit report 	TDWQG 11(1)(2)(3)
Compliance Report	Compliance Reports are required to be submitted to the Director every 30 days from the date of the approval of the Compliance Plan until the Compliance Plan is implemented to the satisfaction of the Director.	TDWQG 12(1)(2)(3)
Annual Reporting	The detailed requirements for Annual Reporting by the Regulated Entity need to be captured by a procedure and evidenced as being implemented against the requirements specified in the TDWQG	TDWQG 13(1)(2)(3) PHA 130(3)
Notification of threat to public health	A procedure needs to be in place for the Regulated Entity to notify the Director of a threat to public health upon becoming aware of it.	PHA 128(1A) TDWQG 5(1)(2)(3)
Warnings and	A procedure needs to be in place for the regulated Entity to issue (and lift) warnings and alerts to the public about the	PHA 128(4)

Auditable Element	Comments	Reference
Information	safe use of water under its management and control. There are specific requirements associated with the content of warnings and advice and a mechanism that the Director must approve the content	TDWQG 6(2)(3)(4)(5)(6)(7)(8)(9)(10)
Warnings and information	The procedure needs to identify all customers of the Regulated Entity including Commercial Water Carriers	TDWQG 6(1)
Approval of Commercial Water Carriers	A procedure needs to be in place for the application and approval of Commercial water carriers to access the regulated Entities infrastructure	TDWQG 20(3)
Public Health Act Orders	A procedure is needed for responding to and dealing with Orders issued under the PHA as they relate to water under the management and control of the Regulated Entity	PHA 129

Appendix D – Departmental Public Health Officer Contacts

Public Health Officers

- State water officer
- State manager Environmental Health Services
- Senior environmental health officer
- Regional environmental health officers

Address

Attention State Water Officer

Public Health Services

Department of Health and Human Services

GPO Box 125

Hobart TAS 7001

Email public.health@dhhs.tas.gov.au to the attention of the state water officer

Phone 1800 671 738

Appendix E – Legislative Scope

The specific requirements of **an auditor** are specified in the *Public Health Act 1997* and the *TDWQG*. The following table will help identify those requirements.

Requirement	Comments	Reference
Definition of Conflict of Interest	Water Quality Auditors need to declare conflicts of interest to the Director. Guidance on what constitutes a conflict of interest is described in the PHA	PHA 127B TDWQG 37
Auditor application	A natural person may apply to the Director to be registered and approved as a Water Quality Auditor to undertake audits of the regulated Entity's DWQMP. The application must be made on the approved form, include the requested details and be accompanied by the prescribed fee	PHA 129C (1)(2)
Approval of Auditor	The Director will consider the application and either approve or refuse the application. Approval will be accompanied by a set of conditions that must be complied with. Unless otherwise specified, and approval will remain current for 12 months; after which time the auditor must make another application to the Director	PHA 129C (4)(5)(6)(8)
Variation, suspension and cancellation	The Director can vary, suspend or cancel an auditor's approval or attached conditions to the approval at any time. There is a right to appeal for the auditor through the Magistrates Court (Administrative Appeals Division) within 28 days of receiving notice.	PHA 129D PHA 129E
Conflict of Interest Declaration	During the course of conducting an audit, the auditor must notify the Director of any conflict of interest that has arisen subsequent to what has previously been disclosed on the Conflict of Interest Declaration Form	PHA 129F(1)
Notification of threats to public health	The auditor must within 24 hours of becoming aware of a threat (real or potential) notify the Director. Threats to public health that need to be notified are those defined as major non-compliances. Minor non-compliances do not need to be notified to the Director until the submission of the audit report	PHA 129F(2)
Audit scope	Ensure audits are conducted in accordance with the requirements of the PHA and TGWQG and the DWQMP includes all requirements of both legislative instruments	TDWQG 8
Audit Report	Prepare an audit report to be submitted to the Director within 14 days of completion of the audit that includes the requirements specified in the TDWQG and this Guidance Note	TDWQG 10
Defined competency criteria	Guidance is provided on the definition of what constitutes competency for a Water Quality Auditor	TDWQG 36