

## 1.0 Purpose of Document

To ensure that the Drinking Water Inspectorate, appropriate Health and Local Authorities, the Consumer Council for Water and Defra are notified of any event which has adversely affected or is likely to affect the quality or sufficiency of the water supplied. The document includes guidance on the reasonable instances when Water Quality Services (WQS) staff should advise external bodies as well as instructions to ensure the appropriate information is provided so that regulatory requirements are satisfied.

## 2.0 Scope

This document provides guidance to WQS staff who might deal with notifying events, and/or non-compliance with regulatory standards and preparing notification related reports.

## 3.0 Introduction

Regulation 35 (6) of The Water Supply (Water Quality) Regulations 2016 defines the external organisations the Company is expected to notify and communicate with in the context of notification of any event which, by reason of its effect or likely effect on the water supplied, gives rise or is likely to give rise to a significant risk to human health. These organisations are shown in the table below

### External organisations to be contacted include:

Organisation	Who
Drinking Water Inspectorate (DWI)	AW Liaison Inspector
Health Authority - Public Health England Units (PHE)	Consultant for Communicable Disease Control (CCDC)/Senior public health professional
Local Authority (LA)	Environmental Health Officer (EHO)
Consumer Council for Water (CCW)	AW Appropriate

In addition Defra ([wsr.emergencies@defra.gsi.gov.uk](mailto:wsr.emergencies@defra.gsi.gov.uk)) must be notified of events regarding loss of supply, actual or by restriction of normal use. WQS will notify by briefing note only, any further communications will be by the security and emergency planning team or Emergency Controller.

Further guidance is also given in the joint DWI/HPA publication: [Drinking water safety - a guide to health for water professionals on the Inspectorate's website](#)

### The concept of action thresholds has been used which have generated two conditions:

**Normal:** For situations which are not unusual and are part of sporadic, non-specific, unverified occurrences. These are relatively infrequent and occur as part of normal operations and are not deemed significant.

**Alert:** For instances where there is a first indication that there may be an unusual or unsatisfactory situation developing and which by their nature prompt discussion with the authorities responsible for public health.

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Note: It is a generally accepted principle that a single result whether satisfactory or unsatisfactory has no value on its own. Any assessment of water quality must be made in the context of the system being tested. It is important to consider past history, how the samples were collected and analysed, what results were obtained, pertaining operating conditions etc. Only against this background can the significance of the results be gauged.

On this basis these guidelines cannot be absolutely prescriptive and thus any abnormal or exceptional situations will prompt early discussions with the relevant PHE unit and Environmental Health Department. Additional advice and guidance can be obtained from the Company’s microbiological and chemical experts.

These guidelines have been developed in liaison with the PHE units and LAs, who have endorsed the procedures, and are reviewed annually.

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## 5.0 Notification Assessment Protocol

This section details, as far as possible, the situations that fall into the “Normal” and “Alert” categories.

In this section the words “presumptive” and “confirmed” have the following meanings:

“Presumptive” means that initial analysis has indicated the presence of a substance/organism in a sample and further specific diagnostic tests are being carried out to confirm their presence.

“Confirmed” means that a substance/organism has been shown to be present in a sample by further specific diagnostic tests.

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## 5.1 Normal Status

Normal Status will apply to situations that are sporadic, unverified occurrences and may require Company action to verify that water quality is satisfactory.

### *Bacteriological*

External organisations need not be informed separately from the normal reports when a total coliform (presumptive or confirmed) count has been obtained on a single sample. (Exceptions to this are bacteriological items i, iii and iv in Alert Status).

### *Cryptosporidium*

External organisations need not be notified of a single sample containing <0.05 oocysts per 10 litres.

### *Chemical*

On the basis that in general the levels and trends of chemical parameters are well established and the potential problems are known, such as in the case with S19 Undertakings, exceedances need not be notified as a matter of urgency. Examples in this category might include iron and pesticides.

However, for recently identified or emerging chemical parameters individual reporting and notification trigger levels have been agreed with the PHE units and LAs e.g. Metaldehyde and PFOS/PFOA.

## 5.2 Alert Status

An Alert Status is raised, and notification to the external organisations initiated, in situations which have been identified as representing a possible deterioration in the quality of water and which may require the Authorities' involvement in decision making. Situations where notification is appropriate are listed below:

### *Bacteriological*

- i. Any sample taken post the relevant disinfection stage which contains presumptive or confirmed *E. coli* or confirmed *Enterococci* with the exception of samples taken from fire hydrants. In these cases an assessment of the situation should be made by the relevant Operations Scientist to determine the likelihood of a deterioration in the quality of water being supplied.
- ii. Any sample which contains presumptive or confirmed coliforms or *E. coli* or confirmed *Enterococci* taken from a non-household (NHH) property where water may be consumed by a third party.
- iii. Any sample containing presumptive or confirmed coliforms or *E. coli* or confirmed *Enterococci* which is supported by any other sample containing presumptive or confirmed coliforms or *E. coli* or confirmed *Enterococci* taken on the same day from a related sample point\*.

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- iv. Any repeat or additional samples\*\* containing presumptive coliforms or *E. coli* or confirmed *Enterococci* which substantiate an initial presumptive or confirmed coliforms or *E. coli* or confirmed *Enterococci* result.

\* A related sample point would be any in the following flow:

Treated Water ⇒ Service Reservoir / Water Tower ⇒ Water Supply Zone

\*\* Where the initial investigation has not provided sufficient evidence for the cause of the failure.

#### *Cryptosporidium*

Any final water sample which contains  $\geq 0.05$  oocysts per 10 litres will be notified by telephone. This will include any sample that is taken from a point after the last solids removal process. Multiple positive sample results at a concentration lower than 0.05 oocysts per 10 litres may require notification.

#### *Chemical*

Any exceedence of the Prescribed Concentration or Value (PCV) which is considered by the Operations Scientist to be unusual or is not covered by a Section 19 Undertaking.

Any result for a parameter, which does not have a PCV, which is considered by the Operations Scientist to be unusual.

Any turbidity result above 1 NTU from a sampling point at a treatment works that indicates the water being disinfected has a turbidity above 1 NTU and is corroborated by evidence from the local Production team and/or the Company's telemetry system.

#### *Other*

It is also important to remember that unusual events that may pose a significant risk to health can arise without supporting laboratory results. These events include, for example:

- a) Failure or malfunction of one or more parts of a treatment process or failure of equipment within a treatment process leading to inappropriately treated water leaving the treatment works.
- b) Mains failure (bursts) where contamination of the main is suspected and/or extensive depressurisation of the mains system has taken place with the risk of backsiphonage and contamination of the mains system.
- c) Clusters of customer contacts regarding dissatisfaction with the quality of their water supply. See Appendix 1 for the numbers of contacts for each category that triggers consideration of notification
- d) Pumping failure leading to depressurisation and the risk of backsiphonage and contamination of the mains system.

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- e) Mains failure (bursts) or pumping failure leading to widespread loss of supply.
- f) Raw water pollution where there is a risk that it cannot either be effectively dealt with by the treatment processes or be prevented from entering the treatment works.
- g) Suspected contamination of treated water reservoirs e.g. evidence of unauthorised entry or vandalism. Unauthorised Access at Water Company Sites - Any instance of unauthorised access to Affinity Water operational water supply sites where there is a potential risk to water quality as detailed in DWI Technical Letter 04/2005 – Annex A (see link in section 7.0 References) should be assessed by Asset Specialist (Security & Emergency Planning).
- h) Risk of chemicals leaching through, or from, pipework causing contamination.
- i) Reports of possible illness associated with the water supply.
- j) Environmental situations or third party actions that could impact on the sufficiency or quality of the water supply.

### 5.3 Further Action

Once the decision to notify external organisations has been made all relevant parties must be contacted. The exception to this is PCV failures specific to an individual property (e.g. lead, nickel) where only the Environmental Health Officers (EHOs) need to be notified.

Where the situation develops into an incident or further action is required then contact with the DWI, CCDC and EHOs should continue at an agreed frequency, which should all be logged. Updates should be provided when information is available, normally in the form of a briefing note, with CCWater also included in the circulation.

Where the situation requires the formation of an incident management team or a decision to issue advice to customers e.g. boil water notice, do not drink notice etc., this will normally be made in full consultation with the people having the necessary expertise to ensure that appropriate action is taken.

At this stage reference should also be made to the Company's Emergency Planning Procedures and communication with any additional stakeholders must be considered or where there are any Memorandum of Understanding which have been agreed previously eg with the British Retail Consortium, British Soft Drinks Association and European Point of Use Drinking Water Association.

Regulation 35(6) of The Water Supply (Water Quality) Regulations 2016 requires the Company to notify DWI of any event that has been notified to a PHE unit and LA. Further guidance on the details the Inspectorate requires can be found in the 'DWI Water Industry (Suppliers' Information) Direction 2019 paragraph 9, Provision of information – events, incidents, emergencies, the document 'Guidance on the Notification of Events' 2019 and Appendix 2. Briefing Notes (BN), Priority Information Notices (PINs) & Reports guidance.

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## 6.0 Responsibility, Timescales and Details of Reporting

- Operations Scientist or designated person: initial assessment of significance of event of unusual or potentially unusual water quality or supply issues; any resulting notification; preparing and issuing PINs and Briefing Notes; coordinating interim and final reports.
- Head of Water Quality Services (HWQS) or one of the Water Quality Managers (WQM): confirm initial assessment of significance of event of unusual or potentially unusual water quality or supply issues. On standby the Emergency Controller must be contacted for confirmation prior to notification.
- Asset Specialist (Security & Emergency Planning): for unauthorised access to Company site with a risk to water quality.

Operations Scientists will be responsible for notification of any alerts to the external organisations listed in section 3. Notifications should be made as soon as the alert has been identified and certainly on the same day. If necessary, standby arrangements should be used.

If **ALERT STATUS** has been initiated then following telephone notification, details of the incident (using a Briefing Note template – Appendix 2.) should be e-mailed to the external organisations giving details of:

- Location and results
- Possible causes
- Population affected
- Expected duration
- Action taken
- Further action required

**It is IMPORTANT to note that the need to contact the external organisations should not delay or prejudice any immediate remedial actions that are required.**

**Consideration should also be given as to whether notification of the Company’s toxicological and/or public health adviser is appropriate.**

## 7.0 References

SSO-001	Cryptosporidium Monitoring Strategy
SSO-126	Response to Contraventions or Potential Contraventions of PCV (including Appendix 1 Cross Boundary Supply details)
SSO-163	Customer Notification following a PCV Contravention – Guidance Note
SSO-164	Potential Contamination of Supplies from Fuel Spillages – Guidance Note
SSO-309	Operations Action Report Form
EP010a	Emergency Plan Part 1
EP016	Priority Information Notice (PIN) Procedure
CS036	Recording & Monitoring WQ Contacts by CCC Procedure
PD041	Production – Response to Unusual Water Quality Results Procedure

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External Contacts Information held at:

<S:\Water Quality\Contacts & Standby\AW Health Authorities.doc>

<S:\Water Quality\Contacts & Standby\AW Local Authorities.doc>

DWI Contacts for Emergencies affecting Drinking Water Supplies Link:

<S:\Water Quality\Contacts & Standby\DWI>

The latest guidance on events to be notified is given in DWI's "Guidance on the Notification of Events" 2019 : <http://www.dwi.gov.uk/stakeholders/guidance-and-codes-of-practice/2019%20GUIDANCE%20ON%20THE%20NOTIFICATION%20OF%20EVENTS%20v1.1.pdf>

DWI Technical Letter 04/2005 (Restricted Access)

Unauthorised access to Water Company sites – Events requiring notification to the DWI

<S:\Water Quality\DWI\Information letters\DWI Information Letters 2005\TL 4 2005 Unauthorised access notification.doc>

Water Industry (Suppliers' Information) Direction 2019 **Section 9**

Water Supply (Water Quality) Regulations 2016

Toxicology Datasheets – through the UKWIR toxicity datasheet website

Pathogens Datasheets – through the UKWIR microsheat website

## 8.0 Records

- Electronic copies of reports and other relevant information should be saved in S:/Water Quality/Incidents and Event, file title prefixed yy/mm/dd + event description. This should include a copy of the emails and attachments as sent to external organisations.
- PINs:
  - **Network Control Desk saved on Sharepoint**
  - S:\Water Quality\Incidents & Events\year\incident
- HiAffinity

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## 9. Appendix 1. Further guidance on the ‘triggers’ for communication and the reasoning.

### 9.1. Customer Contacts

Customer Services procedure CS036 Recording & Monitoring WQ Contacts by CCC Procedure documents the way contacts are handled. It includes information on recording contacts on HiAffinity and the requirement to pass certain type of calls directly to Water Quality Services / Scientific Services so that they can be considered on merit.

HiAffinity automatically generates and circulates reports by e-mail for clusters of contacts related to water quality, no water and low pressure. CS036 details how cluster notification is made to Water Quality Services.

Any repeat contacts need to be investigated as some may not count in the total for trigger communication purposes e.g. customer phones back to inform water no longer discoloured.

The headings on the table below contain the HiAffinity description/code and the letters in brackets refers to DWI’s “Guidance on the Notification of Events” 2019 Annex 5 – Examples of events to be notified.

### 9.2. No water/O006 (o,p)

Community Operations Managers must notify Operations Scientists (OS) or Duty Operations Scientist (DOS) of “no water” clusters affecting over 500 properties or where customers are without supply for >6 hours if the cause is known. If the cause is unknown the OS or DOS should be informed if >5 unexplained contacts of no water. It is important to establish whether the area has been isolated and rezoned.

Trigger for communication	Reason for communication
Loss of supply to >500 properties or >100 contacts for over 6 hours.	Potential for backflow, discoloration/aeration upon recharge. Notification to Emergency Planning teams in Local Authorities.
Customers are or are likely to be without supply for > 12 hours.	Public health implications for individuals.
Public buildings without supply leading to potential public health implications	Public health implications for individuals, health care establishments & impact upon general hygienic work practices across a range of businesses.

### 9.3. Pressure problems - low pressure/O008 (q)

It would be unusual to notify for low pressures unless some additional significant activity occurs which could impact upon water quality. If the cause is unknown or if >10 unexplained calls of low pressure are received the CSM will inform the OS or DOS. It is important to establish whether the area has been isolated and rezoned.

Trigger for communication	Reason for communication
Significant reduction in pressure to >2500 properties or >500 contacts associated with one event over a 6hr period. Decision on notification should take into	Potential backsiphonage

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account: whether the event is contained and if the area has been rezoned.	
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**9.4. Aerated-Cloudy/W001 (d,o,r)**

Trigger for communication	Reason for communication
>50 contacts in 24 hours period associated with the same event. Decision on contacting should take into account: whether the event is contained and if the area has been rezoned.	No health concerns however customers may reject on aesthetic grounds, awareness of problem, may be media interest

**9.5. Animals-Insects/W002 (d,r)**

Trigger for communication	Reason for communication
>5 contacts in a WSZ or associated WSZs over a 24 hours period. Decision on contacting should take into account: type of animal/insect.	Customers may reject on aesthetic grounds, awareness of problem, may be media interest

**9.6. Discoloured/Brown/W003 (d,o,r)**

Trigger for communication	Reason for communication
>25 contacts in 24 hours period associated with the same event. Decision on contacting should take into account: the DOMS ranking of the water supply zone, whether the event is contained and if the area has been rezoned.	Significant number of properties likely to receive discoloured supply, water likely to be rejected on aesthetic grounds, health care premises or dialysis patients may be affected
Prolonged discoloration of > 1 day	Media interest and for reasons above

**9.7. Scale-Scum/ W004 (b,r)**

Trigger for communication	Reason for communication
Customer contacts >25 in a WSZ or associated WSZs over a 24 hour period.	An unexpected unusual change in water quality

**9.8. Illness/W005 (f,k,l,n)**

Trigger for communication	Reason for communication
If affecting several properties in one street or significant amount of people in commercial property reports illness as a result of drinking mains water. Decision on communication should take into account: nature, duration of illness and number of people affected. Notification of Cryptosporidiosis in the community is covered in SSO-001 Cryptosporidium Monitoring Strategy.	A potential risk to health

**9.9. Chlorine taste-smell/W006 (d,r)**

Trigger for communication	Reason for communication
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Customer contacts >25 in a WSZ or associated WSZs over a 24 hour period. Decision on contact should take into account whether there has been a change of source or an increase at the WTW.	Customers may reject on aesthetic grounds, awareness of problem
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**9.10. Metallic taste-smell/W007 (d,r)**

Trigger for communication	Reason for communication
Dependent on nature of taste and if cause is known e.g. discolouration following a burst, South Hatfield event 2015.	Customers may reject on aesthetic grounds, awareness of problem, possible public health implications.

**9.11. General + info request/W008 (r,s)**

Trigger for communication	Reason for communication
Dependent on the nature of the communication	Dependent on the nature of the communication

**9.12. Solvent taste-smell/W009 (g)**

Trigger for communication	Reason for communication
Dependent on the preliminary investigation – See SSO-164 Potential Contamination of Supplies from Fuel Spillages – Guidance Note.	Customers may reject on aesthetic grounds, awareness of problem, possible public health implications.

**9.13. Other discolouration/W010 (d,e,g,q)**

Trigger for communication	Reason for communication
Dependent on nature of the discoloration and the results of the preliminary investigation. Decision on notification should take into account: risk from backsiphonage.	Customers may reject on aesthetic grounds, awareness of problem

**9.14. Other Water Quality issues (d)**

Trigger for communication	Reason for communication
Any cluster >5 in 1 hour where initial investigation suspects unusual situation e.g. odour / taste / other discoloration	Likely to be supplying unwholesome water or water will be rejected on aesthetic grounds, may be health implications or remedial actions may require involvement of CCDC/EHO

If there is a significant unusual event the majority of the time a cluster will be reported, however occasionally, due to locality e.g. rural houses, end of distribution system, or time of day e.g. late at night, a problem may be reported by a single customer. Customer contact agents have scripts detailing when OSs or DOSs should be contacted regarding even a single unusual call. See customer contact centre scripts in CS036.

Trigger for communication	Reason for communication
Deterioration of water quality	Awareness of problem and if health related may advise customer

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## 10. Appendix 2. Briefing Notes (BN), Priority Information Notices (PINs) & Reports guidance.

### 10.1. Information Required for Initial Notification

Guidance for information that should be included in the initial notification is in Annex 4 of DWI's "Guidance on the Notification of Events". This information is normally sent in the form of the Briefing Note circulated to the external organisations.

Information provided at the initial notification, including the name of the DWI Inspector, CCDC /Senior public health professional and EHO notified, will be required for inclusion in the 3 day report.

All notifications will require a 3 day report (see section 10.3.1 3 Day Report) unless the DWI Inspector states otherwise following the initial notification.

Following any communications with the external organisations it is good practice to e-mail a briefing note. The objective of the briefing note is to ensure that the external organisations have an accurate record of the events that have been notified. If DWI subsequently contact the CCDC and EHO this record may be used as a reference in the completion of information requested. It is therefore crucial that only pertinent facts are recorded on these notes. Interpretation during an event may subsequently be inaccurate once internal investigations progress.

A briefing note template is available at

<S:\Water Quality\Incidents & Events\BLANKS\Affinity Water Briefing Note template 2017>

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## 10.2. Internal Notification

Where an event may result in consumer contact consider inclusion of the main Company contact details for further information in the BN for the recipients of the BN to pass on or publish more widely.

A member of the Water Quality Services (WQS) team will ensure that a Priority Information Notice (PIN) containing information of the event in accordance with EP016 Priority Information Notice (PIN) Procedure is circulated.

## 10.3. Reports

### 10.3.1. 3 Day Report

In normal circumstances the DWI will require a report within 3 working days of the initial notification, but will specify at the time of notification if one is not required. It is the responsibility of the WQS designated person (usually the Operations Scientist responsible for the activity being notified) to co-ordinate and prepare the report. Guidance for information to be provided is detailed in Annex 5 of DWI's "Guidance on the Notification of Events".

The designated person will:

- Contact the Head of Department leading the event, or nominated deputy, and request the provision of any information pertaining to the notification, as documented in Annex 5 of DWI's "Guidance on the Notification of Events" (see link in section 7.0 References), within 48 hrs so that an internal report can be produced.
- Collate the information, prepare a draft report including: background; log of event; analytical results (spreadsheet); local & health authority contacts; and where appropriate details of the first 50 customer contacts.
- Circulate the draft report to their line manager and Water Quality Manager (Compliance & Regulation) (WQM (C&R)) and make appropriate changes.

Once approved the WQM (C&R), or designated person, should send the 3 Day Report within the deadline to the DWI Events Team at [dwi.events@defra.gsi.gov.uk](mailto:dwi.events@defra.gsi.gov.uk) and the Company's Liaison Inspector by email, saving a copy on the S:/Water Quality/Incidents & Events/Year/Event file.

If there are any analytical results still outstanding when the 3 Day Report is submitted a follow up spreadsheet detailing the full set of results should be sent by email to the DWI Events Team as soon as practicable. A copy of the results and the email should be saved in the appropriate file.

### 10.3.2. 20 Day Report

If the DWI has not notified Affinity Water within 5 working days of its initial assessment of the event described in the 3 Day Report the WQM (C&R) should proactively contact the DWI Events Team to request confirmation of whether a 20 Day Report will be required.

Following consideration of the 3 Day Report the DWI will notify the Company whether the event is classified as Not Significant, Minor, Significant, Serious or Major and if so will request a report

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required within 20 working days. Guidance for information to be provided is detailed in Annex 6 of DWI's "Guidance on the Notification of Events", link 7.0 References.

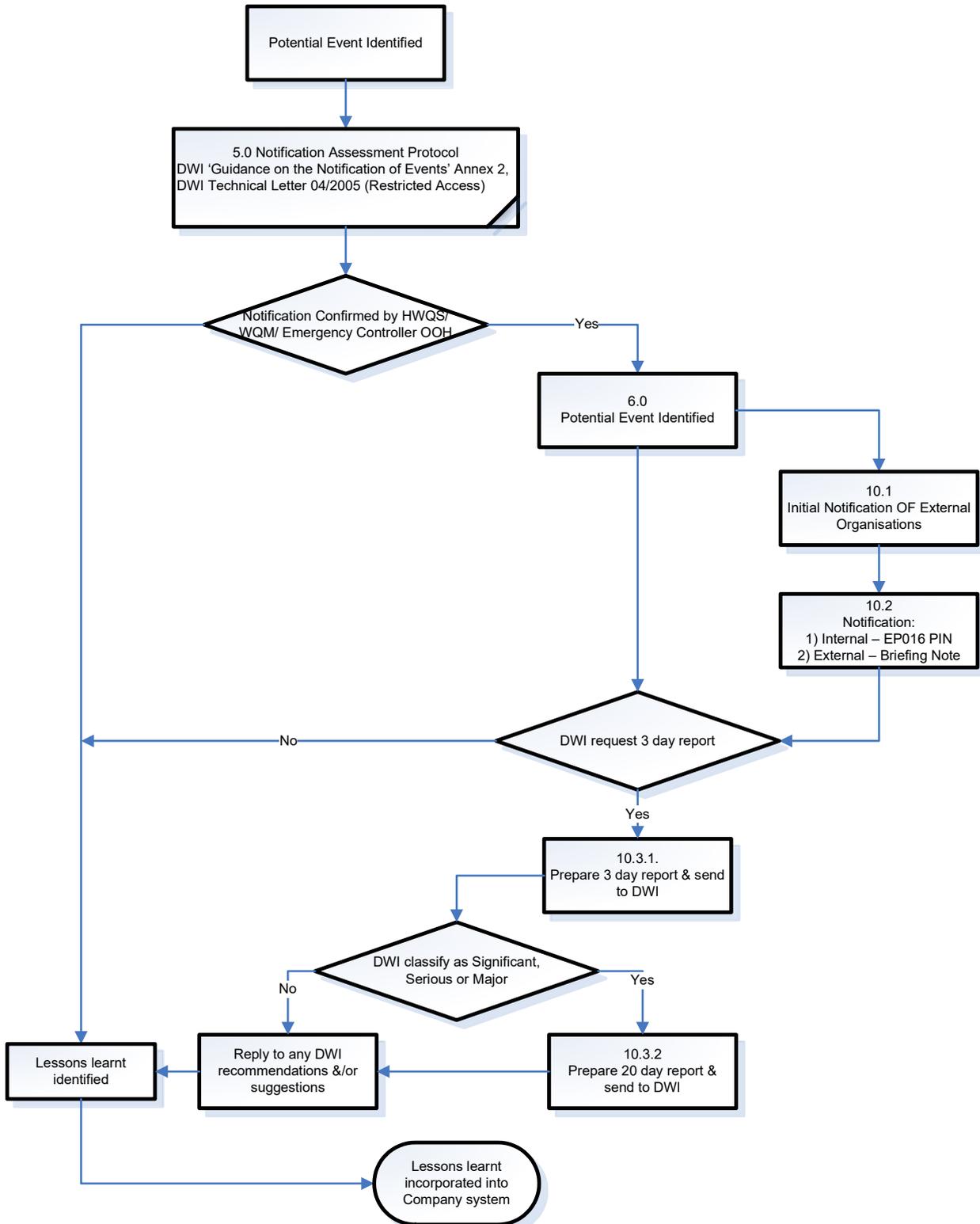
The WQS designated person will:

- Contact the Head of Department leading the event or nominated deputy and request a full report to WQS within 10 working days of the request.
- Check the report, draft a DWI 20 Day Report and secure any additional information required. This may involve staff interviews to confirm the facts.
- Collate the information and prepare a draft report including: an executive summary if required; background; log of event; analytical results (spreadsheet); local & health authority contacts; and where appropriate details of first 50 customer contacts and GIS data. A section detailing lessons learnt and appropriateness and effectiveness of action taken should be included.
- Circulate the draft report to their line manager, WQM (C&R) and make appropriate changes.
- Circulate draft report to Head of Department and HWQS for approval prior to sign off by a member of the Executive Management Team and the Director of Legal & Assurance. Once approved internally the report is sent to the DWI.

The WQM (C&R) or designated person should send the final 20 Day Report within the deadline to the DWI Events Team by email saving a copy on the S:/Water Quality/Incidents & Events/Year/Event file.

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### 10.4. Process Overview



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