

COMPLIANCE MANAGEMENT - A JOURNEY RATHER THAN A DESTINATION



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ABSTRACT

Compliance management within the water industry should not be seen as a destination such as “we comply!”, but rather as a journey of improvement. This involves not only solving specific problems that have been identified, but also initiating a process of engagement at many levels:

- Education and training (awareness)
- Evidence based assessments (field inspections)
- OH&S and water quality Auditing (regulations)
- Project solutions (fixing the problem) and finally
- Process evaluation and data management (has it worked?).

With regulators moving towards a ‘chain of responsibility’ scenario in the sharing of risk management outcomes, all these components assist in creating a journey towards compliance. Auditors will look for an ‘evidence trail’ and if an individual has poor record keeping or has neglected to carry out their nominated responsibilities, then ‘the buck’ will most likely stop with them!

KEYWORDS

Compliance, evidence based assessment, risk management, condition assessment.

1.0 INTRODUCTION

Compliance management is at the heart of most things that we do, particularly if our job description involves the health and safety of other people. Compliance means being responsible for our own actions, making sure that established rules and guidelines are adhered to and that others having a responsibility in the process, are also sharing the workload (and the failures if they occur). This is a very important process in the management of drinking water supplies, where one failure in the control steps can return a modern society back into the dark ages by causing many people in the community to become ill. How lucky do we feel? Or is it only a matter of time before a serious event occurs, and investigators are asking “In your role, how have you ensured that your actions (or lack of actions), did not contribute to a death in the community?”

Achieving compliance or stating that “we always comply”, should not be seen as having a defined ending (reaching a destination). It should be seen as a continuing improvement process, always reaching for another level of excellence (like a journey). This concept is not only about taking responsibility for, or solving specific problems that have been identified and which may arise on a daily basis. It is also a process of engagement, review and documentation on all levels.

2.0 DISCUSSION

One element of working in the water industry is the responsibility of providing quality drinking water to the community. Events occur occasionally that have an impact on water quality and while most are resolved fairly quickly, some problems can linger.

Often given a low priority, the responsibility for correcting these ‘incidents’ is frequently avoided or shifted from one staff member to another without a resolution. These ‘low priority’ incidents clearly need to be managed more closely to demonstrate that due diligence by staff members has been applied.

It is important to have an engagement system in place to record all the processes and personnel who have associated responsibilities for each step in a project. As each person in that chain completes his or her contribution, it is often assumed that the next person will be doing the same, and that a good outcome can be expected upon completion. This is not always the case however, as many well intentioned plans are neglected due to prioritising, or are simply forgotten. There is an ongoing need to identify and record all the steps in the progress of a planned project for future referencing and improvement. This information can then be used to pass an audit or at worst to provide evidence in a legal investigation.

Engagement is about involving anyone with a responsibility, however small, in a process. Sometimes it is the smallest things going wrong, which creates the unstoppable event that effects both supplier and consumer.

Before we discuss the actual recording process and examples of a workable and achievable system, we need to look at the basic steps of reaching compliance. An auditor will be doing a similar thing, possibly after an ‘event’ has occurred or simply as part of regulatory requirements. The five main steps in a typical water industry scenario are as follows:

- Education and training (awareness)
- Evidence based assessments including field inspections.
- OH&S and water quality auditing against regulations
- Project solutions (fixing the problem) and finally
- Process evaluation and data management (has it worked?).

2.1 Education and Training

Have we got the right people to do the job, along with the correct tools? Are the staff members who are relied upon each day to ensure the safety of customers, adequately trained? Have they just been fitted into a role to help out during a time of low staff numbers? Who supervises them and ensures that tasks are completed and signed off?

Education (awareness) can be as simple as reading the guidelines or works procedure of a particular process being carried out. How often do we neglect to read the instruction book, waste valuable time experimenting with this and that, fail to find an outcome... then consult the book or manual and find out the answer was very simple...if the right approach was taken in the first place.

A majority of training that takes place within water organisations is OH&S oriented, because “that is what we always do”. Let’s ask questions here and gauge if this training is continuing to be relevant or is it just a repeat of last year’s program, and therefore lacking in interest and the real needs of the personnel in question? Let’s look at new training modules or programs that explore other aspects of safety, including the quality of the water being produced and supplied to consumers. One mishap here and many more casualties will occur across a much wider community base than at the everyday workplace.

A balance needs to be found that embraces the existing courses, as well as looking for other types of training (such as on-site seminars which focus on 'local water systems', skill sharing with other organisations and co-worker mentoring).

Managers need to 'raid the training budget' to send along more and more personnel to conferences, such as these Water Industry Operators Association (WIOA) events. While often seen as 'a junket' for the lucky few who attend them each year, these few days provide intensive training, across a variety of industry fields, with quality information being provided and good ideas often swapped amongst the delegates.

2.2 Evidence Based Assessments

Evidence based assessments, including field inspections are utilised to find out what is actually out there, what condition an asset is in and the likelihood of something going wrong. Many water operations staff rely on historical information or what is assumed to be in place, without actually checking for themselves. Businesses fall into the comfort zone of assuming that all is well as long as we don't look! It is standard practice to use industry formula for age related depreciation schedules and life expectancies, but having an up to date appraisal is not a waste of time or money if it can avoid an incident or illness to a member of the public. Approach these reviews with a 'beginners mind'. Use a new staff member to review sites with the usual site operator – this will allow 'a fresh eyes' approach and hopefully identify hazards before they cause an incident. We take our cars for a service on a regular basis and we are reminded to have yearly checkups at the doctors, so why not have regular reviews of the distribution systems and water storages? We assume to know what is out there, yet time and time again there are rusty roofs, birds gaining access, tree roots growing within, drainage areas not properly connected etc. Scheduling a field inspection process to provide good quality and experienced information on a regular basis will hopefully identify any problems before the community is put at risk.

It is important that this condition assessment information is supplied and managed in a format that is easy to access and understand. Many water utilities have shelves of external reports completed over the years, but are they acted upon? A lot are never read because of their complexity or lack of relevance. Rest assured that an auditor or investigator will be looking at them if an incident has occurred, so it is important to make them accessible and understandable to all involved in managing a particular process or asset.

2.3 OH&S and Water Quality Auditing

Regular auditing can be stressful for a client who has a poor compliance recording system in place. It is common to hear that staff are fearful and the usual 'last minute rush' occurs to put things into place, in the lead up to the auditor's arrival. By contrast, these audits should be used as a 'spring clean' and a time to refresh what needs to be put into place. Asking the questions of "what are the steps and regulations required of us", "have we covered all that is needed"? Auditors are trained to discern such things and trying to cover up the gaps is much more difficult, than showing how you have actually solved the issues! There are different levels of auditing available to a client: they can be conducted as a regulatory, internal or a peer review process. Whichever system is used, it is important to document when they have been carried out and what has been done to act upon the findings.

2.4 Project Solutions

Once identification of issues or audit findings have been determined, then there is a need to act upon the findings. In the industry we often hear that “ohh yeah... I was going to do that but just haven’t gotten around to it yet...” How would you feel if you had to say this in Court during an investigation into a water quality event! So, if you have been given the information of what needs to be done, act on it now!

Sadly, with modern society and the lifestyles we lead, everything is becoming busy. It is common place in organisations to hear excuses, covering of backsides or shifting the blame. “Yes we should have gotten around to that but we have been so busy...” or “I thought ‘so and so’ was doing that...” or “I told ‘x’ that something should be done about it”. All these can make you feel better and relieved of the responsibility, but standing up in a Court or in front of the community in which you live, and saying that I knew about the problem, but didn’t act because of the above excuses...leaves you with little creditability at the end of the day. So take notice and share information with your work colleagues and staff members, that if a problem is identified, then we all have a responsibility to fix it! If you have staff or management that don’t like ‘carrying their responsibility’, make sure that you are doing everything you need to, and then document it, so that you have evidence of your actions.

These actions are as follows and can form the basis of a typical online recording system:

1. A register to list all the persons of responsibility for a given project.
2. Tasks are allocated and each responsible person is identified.
3. The scope of works is written and approved by the authorised personnel
4. Time based limitations are listed and if any person or group within the project has failed to carry out their allotted task it will become apparent.
5. The completed task is checked for quality and relevance and then signed off
6. The ‘work as executed’ documentation is archived for easy retrieval, as trends and historical records can be a valuable tool in knowing what to do next time in a similar situation.

Staff retirements and changing roles can lead to valuable information and compliance solutions being lost in a very short period of time. Never mind that the construction of the Pyramids, which appeared to be an engineering master piece at the time, seemed to have ground to a halt after a few key staff obviously failed to record the work as executed plans and ‘took a retirement package over on the Red Sea’! So let us learn to record the relevant information to re-occurring problems, and hopefully we will continue on the journey of improvement.

2.5 Process Evaluation and Data Management

Once a project has been signed off and archived, (usually never to be seen again!), it is necessary to revisit from time to time and re-evaluate if things could have been done differently, with better materials and processes employed for future works. Sometimes projects have been signed off without being completed, so always check before signing the cheque!

This comes back full circle to the evidence based assessments and managing the results.

Information and record keeping systems have gone from paper oriented to electronic data, but the principles remain the same – easy access and simple, unambiguous categories, that can be understood and retrieved by future generations. We need to standardise recording systems (within reasonable boundaries) so that future generations can learn from our current knowledge.

Our new, ever increasing technologies and IT systems have created boundaries that are difficult to bridge from one year to the next – similar to paper records being written in a new language every few years, with the current readers being none the wiser as regards the archived information.

3.0 CONCLUSION

Working in the water industry carries a level of responsibility that requires all associated staff to understand and appreciate that their best actions are paramount to ensure customer and community health and safety. Regulators are now moving towards a ‘chain of responsibility’ scenario in the sharing of compliance management outcomes and this is where auditors will look for an evidence trail, should an incident occur. If an individual or organisation has poor record keeping or has neglected to carry out their nominated duties, then the responsibility will end up with them! Most people only realise the need for a compliance management system **after** an event has occurred, but it is too late then and the damage has been done.

How lucky do you feel? Better to have all the bases covered just in case!