
Water Industry Approved Plumbers Scheme (WIAPS)

Audit Procedures and Guidance



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VERSION 2

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1. Introduction

The success of any quality membership scheme lies not in the availability of sufficient members to meet demand, but on the quality of that membership, and the manner in which the Scheme is administered. It is vital that audits are carried out to ensure:

- that high levels of compliance and workmanship are consistently maintained by scheme members; and
- to maintain the creditability of the scheme.

Audits are also an opportunity for Water Companies to build relationships with members operating in their area and to remind them of the scheme's requirements.

This audit procedure has been developed by the WIAPS Coordinating Group for use by all subscribing Water Companies.

2. Audit Drivers

There are a number of reasons why an audit of a Scheme member may be carried out. These include:

- **Induction audit** – an audit to be completed upon receipt of an application to join WIAPS. WIAPS will inform the applicant they will be required to complete an induction audit with their local water company prior to being accepted onto the scheme
- **Membership audit** – a routine audit of a WIAPS member that may be triggered by: random selection, receipt of a Certificate of Compliance, or as the result of an event/incident or a complaint being received. Each scheme member should be subject to a membership audit at least once every 5 years.

In general, the methods of investigation will remain the same although the driver for the audit should be made clear on the audit documentation, to enable accurate visibility of the performance of any individual member to be maintained.

3. Audit Requirements:

The primary purpose of an audit is to ensure a member is complying with the Water Fittings Regulations and Scheme requirements. However, audits should also be used to build working relationships with the member and to offer advice and guidance to the member on any updates to interpretations or scheme rules. It is therefore recommended that the member be present for an audit. This may not be possible for Complaint Audits or Membership Audits triggered by an event/incident.

Further checks will be carried out by water companies, on the number of certificates issued by individual members (for compliance with Regulation 6). During an audit, the auditor should ask to see the members pad of Certificates of Compliance to check on the numbers of certificates being issued.

Scheme Compliance

The Scheme is expected to review the numbers of certificates being issued by each member, based on water company feedback. Anomalies in the numbers of certificates issued (i.e. very few

for a particular member) should be highlighted by the Scheme as suspected failures to comply with Regulation 6 and then referred to the appropriate water company, who should contact the member to investigate.

This can only be carried out effectively, if each subscribing water company makes monthly returns to the Scheme of the number and details of Certificates of Compliance received in the preceding month, and this information should be recorded by the Scheme. This information should include as a minimum:

- The individual members membership number
- The individual members name
- The work completed certificate number
- A brief description of the work

The Scheme will carry out checks on the appropriate level of insurance required, on each WIAPS Business Member annually, and also confirm that individual members are still employed by a current business member.

4. The Method

Audits are a vital element in ensuring the credibility of the Scheme as a whole, and as such should be conducted professionally and thoroughly. It is also an opportunity for water companies to build relationships with members operating in their area. The person auditing should be fully aware of the requirements of the Scheme and qualified to enforce the Water Fittings Regulations.

Developing the audit program

Audit inspections should be chosen by the water company carrying out the audit. Ideally, they should be on completed works for which a Certificate of Compliance has been received and be large enough to provide a clear indication of the members' on-going competence and compliance. It should however be recognised that not all members will undertake large installations, and an audit should reflect the day to day work of the member.

Water companies will be responsible for planning audits based on their assessment of risk and the minimum number of audits required by this audit procedure.

Initial Contact

Contact with members to arrange an audit can be made by either letter, email or telephone, but in any case, a record of contacts should be maintained in the event that a member refuses to cooperate with an audit request, which may result in disciplinary action. Alternatively, in the case of new applicants, water companies can request that a member contacts them in order to arrange an audit.

The Scheme conditions allow for inspections to be carried out without the member being present. However, audits should also be used to build working relationships with the member and to offer advice and guidance to the member on any updates to interpretations or scheme rules. It is therefore recommended that the member be encouraged to attend an audit, where appropriate, in particular for an induction audit. This may not be appropriate in all cases, for example a membership audits triggered by an event/incident or a complaint. However, a

member should always be made aware once an audit has been completed and the outcome of that audit.

If the premises where the installation to be inspected are occupied by a third party then access needs to be obtained. This can be done either by the company or the member by agreement, and an explanation of the reason for the inspection given to the customer concerned. In exceptional cases, where the inspection is in connection with an event or incident for instance and access is refused for any reason, access may be gained by the exercising of a company's powers of entry. Where the premises to be inspected in a non-household premise, the Retailer will need to be informed of the visit.

A member should not refuse to co-operate with an audit request, and any refusal should be seen as a warning sign to the relevant water company that this particular installation, and perhaps one or two others as a further sample, may be worthy of scrutiny. Any refusal to co-operate should be referred back to the Scheme Manager, who would then consider what action should be taken, in line with the Scheme disciplinary code.

The Inspection

The inspection should cover all aspects of the Regulations as is reasonably practicable, including workmanship. The inspection should be of either a live site where a member is currently working, or of completed work, where it may not be possible to inspect all aspects of the installation. Notes should be made at each stage of the inspection and if non-compliance of the Water Regulations is found member to be informed. The aim should be to seek resolutions to any concerns at the time of inspection, together with an agreed timescale for rectification. This should be undertaken in accordance with the water company's enforcement policy.

At all times the audits must be professional and have due regard to the reasonable needs of the member. At no time should the credibility of the member be jeopardised without just cause. To this end any discussions over concerns raised during the inspection process should be handled discretely and, in a manner, which would not cause concern to any owner or user of the system who may be present. The discussions regarding concerns over the installation should be held in as confidential a manner as possible, although in some cases the owner/occupier will undoubtedly be present.

At all times the spirit should be one of advice and guidance of the member. If actions become warranted or necessary then they may be best discussed with the member solely, where practicable, and then advised to the owner/user by the auditor, which explains any actions needed and why, without raising unnecessary concerns. Due regard should be given to the seriousness of the concern, the views of the member, and the impact of the concern on the safety and suitability of the installation. Members should be given an opportunity to raise any objection to audit findings and any proposed remediation.

Advice and guidance

Audits are an opportunity for water companies to offer advice and guidance to members. Where a successful audit is completed, it would still be prudent to discuss aspects of the Regulations and Scheme requirements with the member. As part of the audit report form a crib sheet is provided to highlight areas which were discussed with a member.

Where a member fails an audit, it would also be prudent to discuss aspects of the Regulations and Scheme requirements with the member. However, if concerns over the lack of knowledge are raised, it may be necessary for the member to re-sit an assessment in Water Regulations Knowledge.

The Report

Each water company will have its own non-compliance procedure and relevant documentation, which will record an audit, and all contraventions should be recorded

Water Companies should report to WIAPS the outcomes of audits. Due to the General Data Protections Regulations (GDPR) it may not always be possible to send the full details of an audit to the scheme. The minimum information required by the scheme is detailed in Section 5: The Documentation.

This will allow the WIAPS administrators can keep the WIAPS database up to date.

Water Companies are welcome to provide additional information to the scheme as they see fit, but should be aware of the requirements of GDPR, and seek consent prior to sharing and third-party personal data. This should not be an issue where a complaint audit is carried out as it is likely that WIAPS will already have this data.

The Follow-up

In the event that remedial works are required on the inspected systems it is expected that re-inspection will be carried out as part of the incumbent company's routine Regulations Enforcement Policy. Completion of rectification works should be reported to the Scheme so the audit can be recorded as completed.

The Scheme will maintain an electronic record will be kept of when an audit was carried out and the outcome of the audit. The scheme will monitor the overall number of audits carried out.

In the event that one or more audits reveal serious concerns over the suitability of a member to remain on the Scheme, either the Auditor shall identify this, in the event that an audit is failed or by the Scheme in the event of a series of audits are failed by different auditors. Consideration shall then be given to the means by which these concerns are actioned.

5. The Documentation

The Scheme will provide documentation for water companies to record audits. However, it is expected that contraventions will be recorded on a water companies own documentation in order to report this back to the member.

The minimum information required by the scheme is:

- Membership number
- Members name
- Members employer
- Name of the auditor
- Date of the audit
- The type of audit
- The outcome of the audit
- Water Company reference for the inspection

The Scheme will provide a model audit sheet for auditors to use, and water companies can adapt this to suit their needs. The model audit sheet will also include a list of topics to discuss with members during the audit.

6. Investigation/inspections of another Approved Contractors' Scheme members' work

It may become necessary to audit the work of members of another Approved Contractors' scheme. This is only likely to arise as the result of an event/incident or a complaint from a concerned party.

In these cases, the investigation is part of routine Regulations Enforcement responsibilities of the incumbent water company, although it is recommended that the general principles of this document be followed. WIAPS would have no objection to its documentation being used for such purposes, although the reports must indicate that this is not a WIAPS audit.

The auditors will confine themselves to a pure Regulations audit and will not become involved in any investigations relating to that members compliance with their own Schemes' terms and conditions.

Referral Guidance

In these cases, the incumbent water company would need to issue formal contravention notices against the work and action them in accordance with their declared Policy and Practice documents if contraventions are found. Whilst WIAPS provides for any corrective action being done at the cost of the member, WIAPS can only request that this is done under the terms and conditions of the scheme and initiate disciplinary action where a member is believed to have breached these conditions. To ensure contraventions are remedied, water companies should use their enforcement powers as appropriate, rather than solely relying in the scheme terms and conditions.

7. Appeals/Grievance Procedures

Whilst every effort will be made to maintain reasonable working relationships between the Scheme and its members there will inevitably be occasions when a member may disagree with a decision or an action.

Disagreement's arising from audits is likely to be the most common basis for a member appeal . This is likely to arise as a result of the auditor not being satisfied that the installation reasonably meets the requirements of the regulations and is requiring the member to carry out works at his/her own expense to correct the contravention.

In the first instance the auditor must be clear that:

- a contravention clearly exists; and why
- the defence offered by the member is inadequate.

If the discussion between the member and the auditor has failed to resolve the issue then the WIAPS disciplinary and grievance procedure should be used. However it should be noted that water companies are likely to use their separate enforcement powers to ensure that any contravention is remedied and any complaints may fail under the water companies enforcement policy and/or complaints process

8. Sector Scheme Member Audits

This audit procedure shall apply to plumbers and members of the Point of Use Installers and Catering Equipment Installers Sectors.

Groundworker audits will be water company specific dependant on resources and the number of new members in that area.

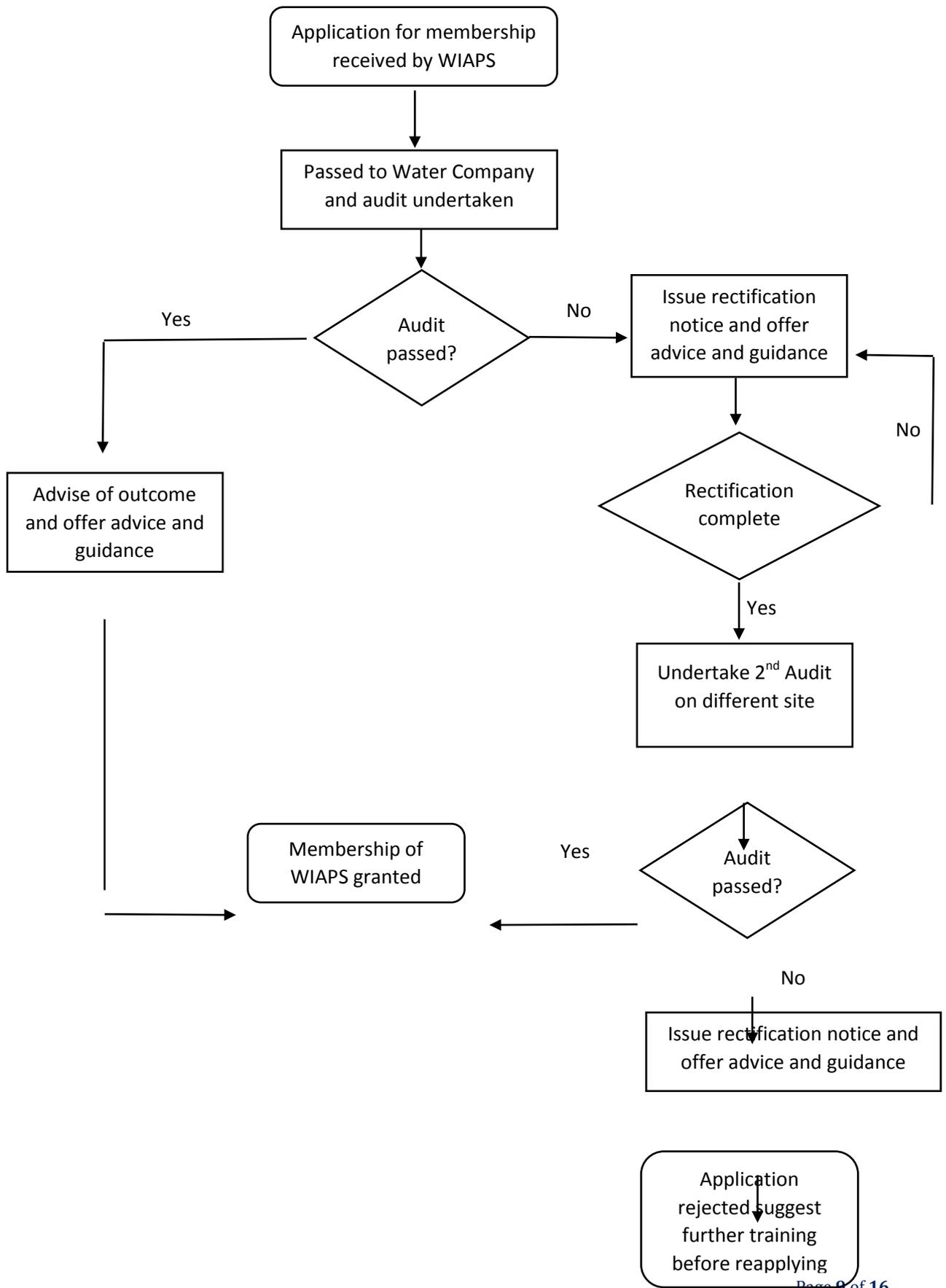
9. Review

This document has been reviewed and endorsed by the WIAPS Coordinating Group. This document will be reviewed at least every five years.

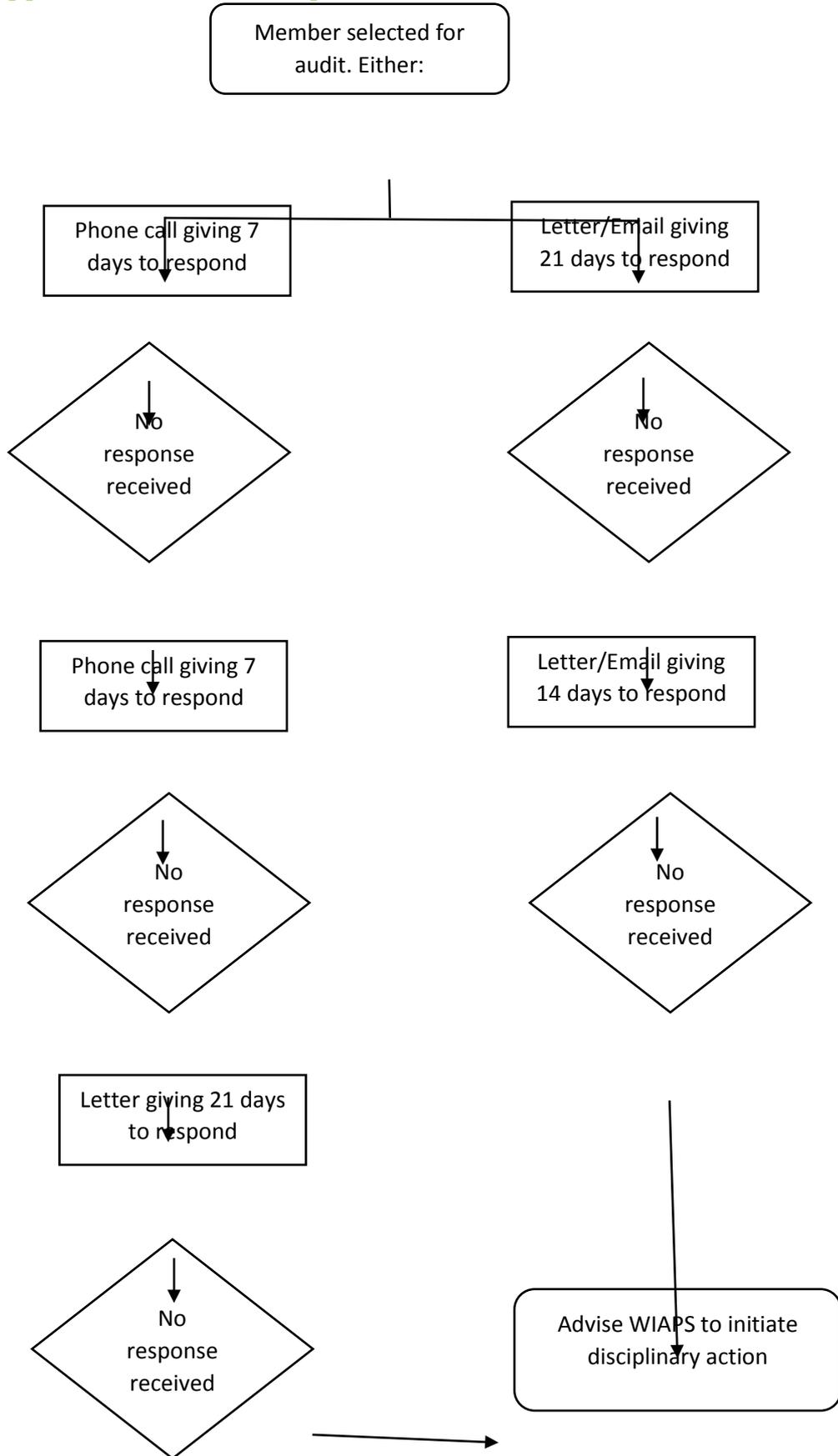
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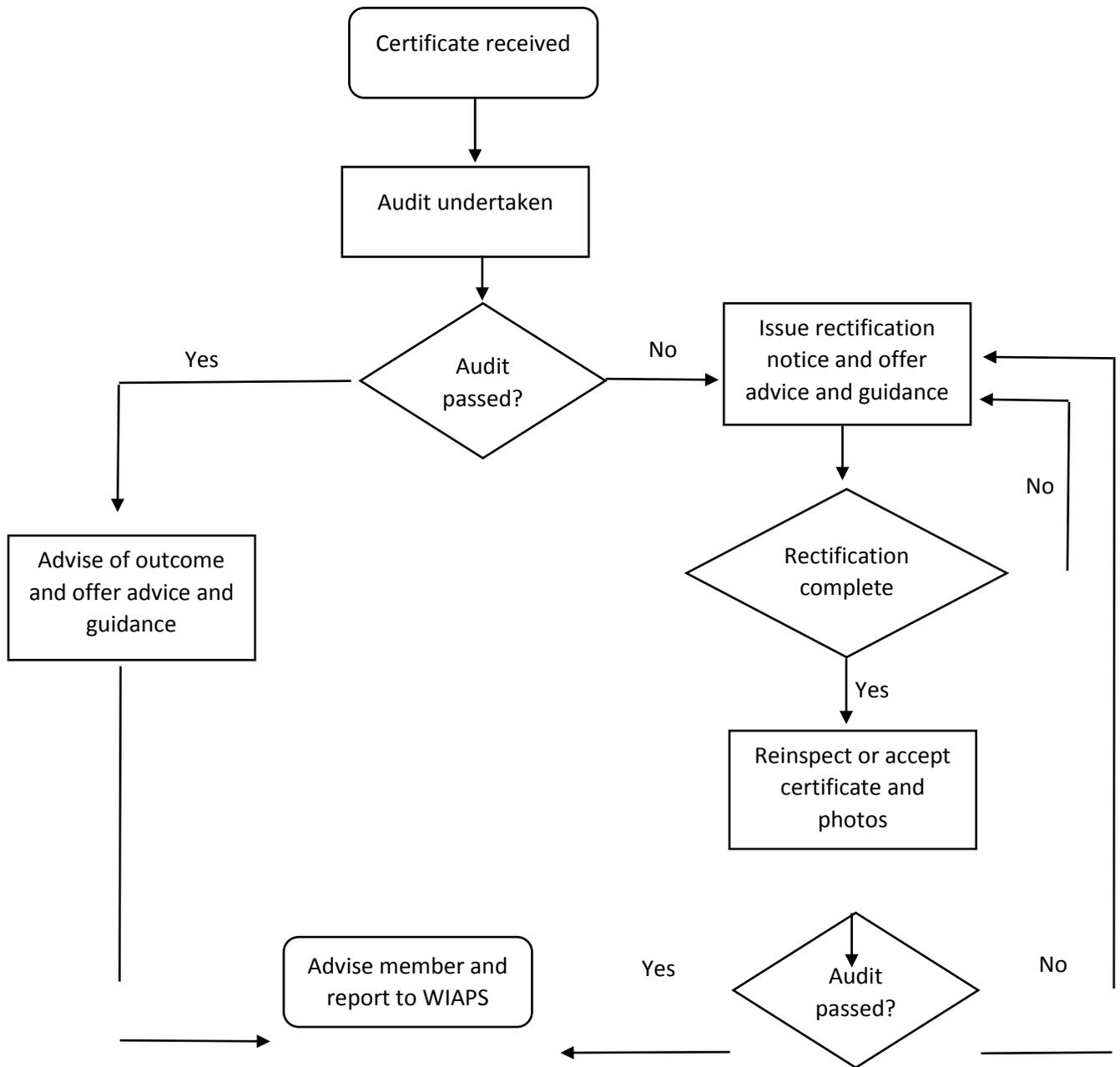
Appendix A: Induction Audit flow chart



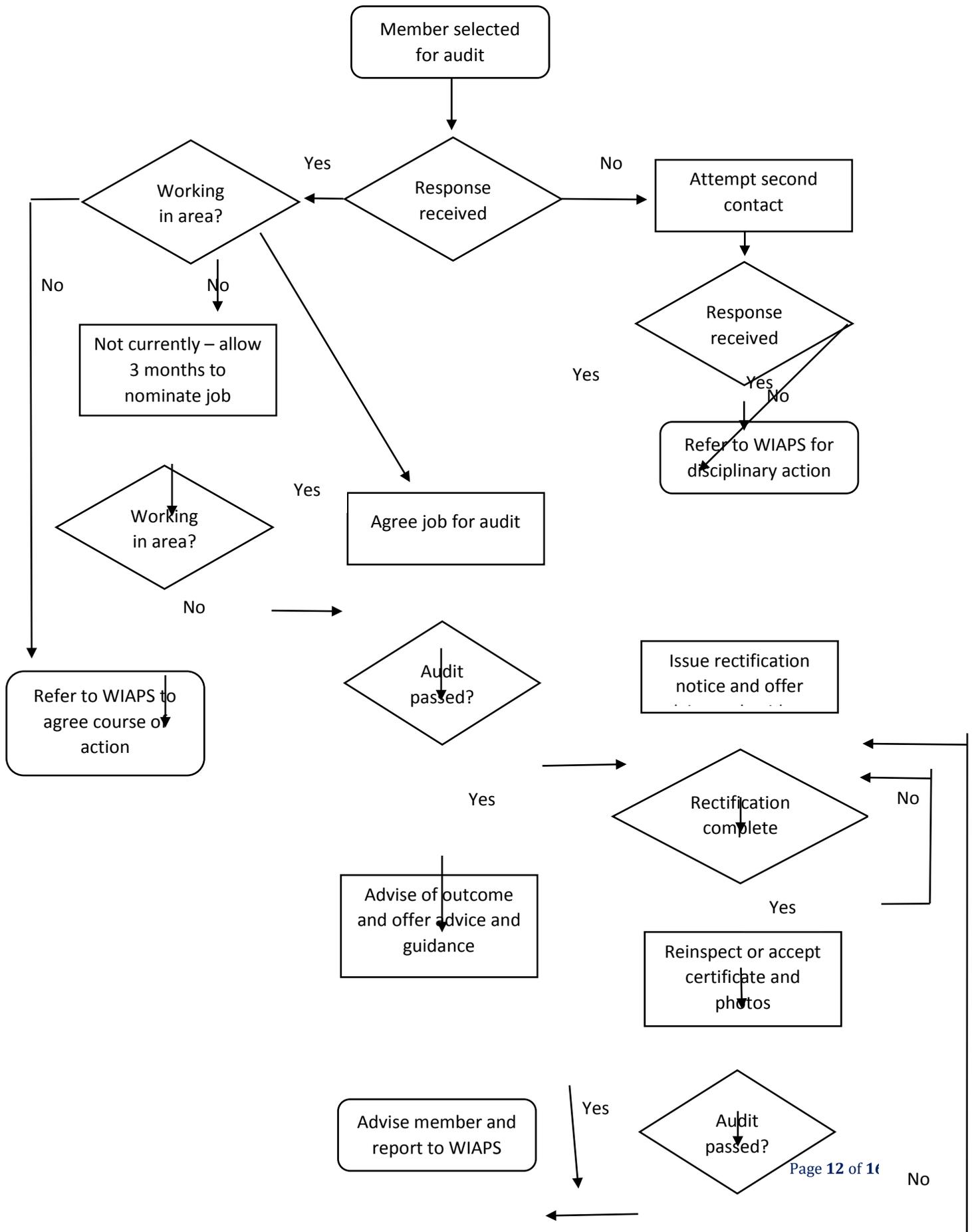
Appendix B: Membership Audit flow chart – Routes to contact



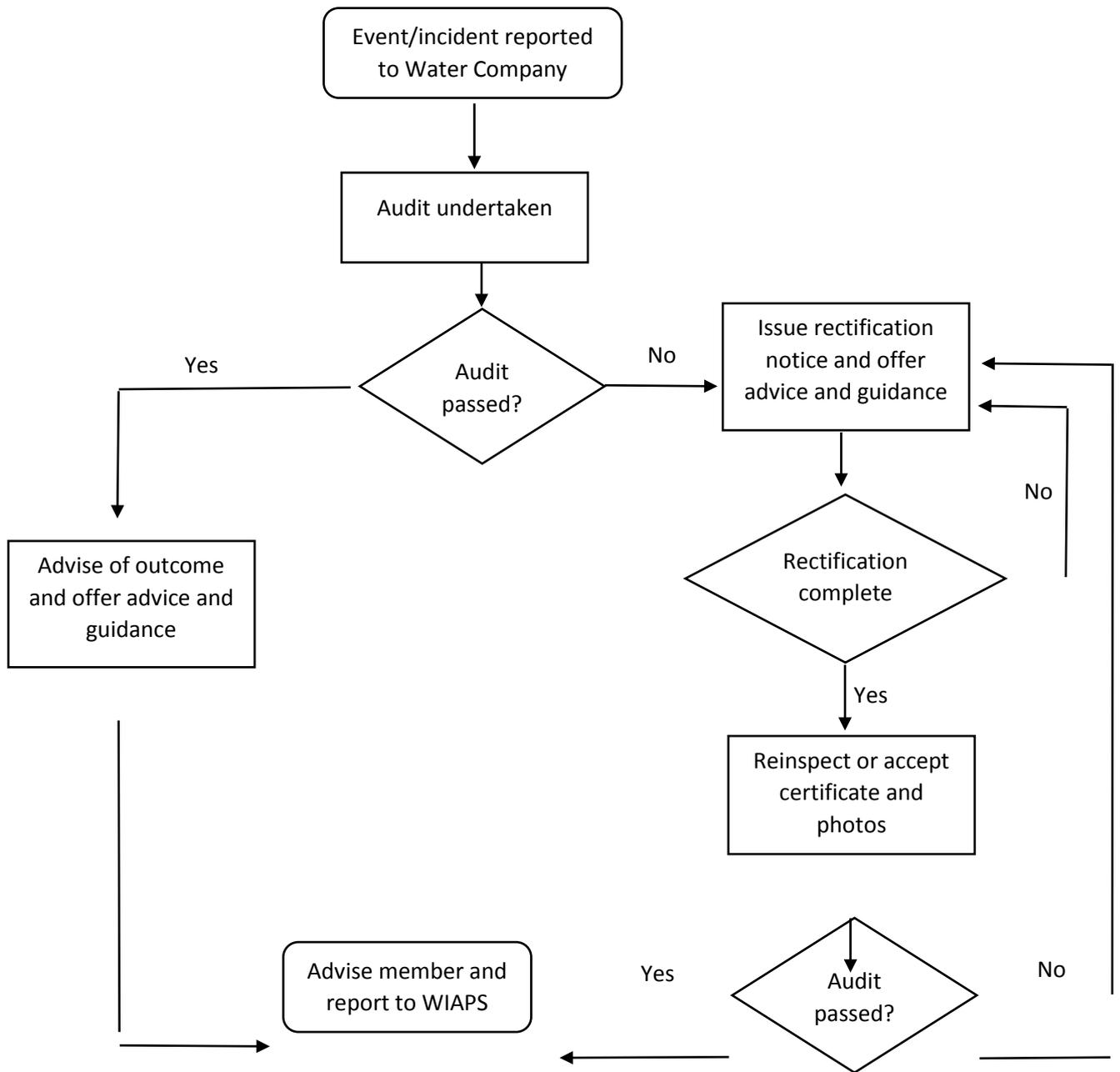
Appendix C: Membership Audit flow chart – Certificate of Compliance received



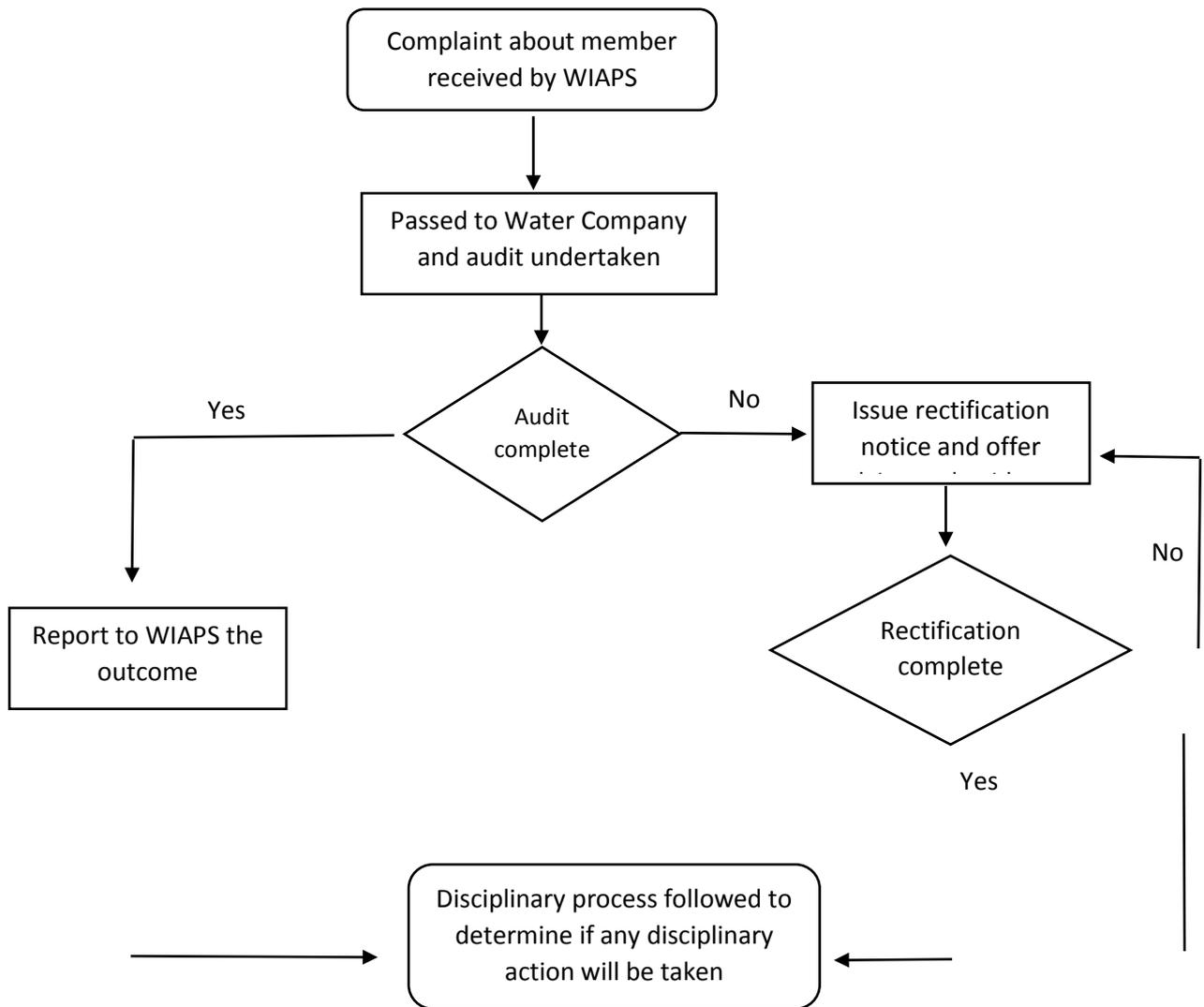
Appendix D: Membership Audit flow chart – Random selection



Appendix E: Membership Audit flow chart – Event/Incident



Appendix F: Complaint Audit flow chart



WIAPS Audit

Water company checklist



Water Regulations Compliance check list:

Was Notification required? Yes No

If yes, was notification given? (whether by contractor or other) Yes No

Was a Certificate of Compliance issued to the customer? Yes No

Was a Certificate of Compliance issued to the Water Company? Yes No

Is the member issuing Certificate of Compliance in general (Check pad) Yes No

Type of premises (Household/non-household) HH NHH

If non-household, give description:

Date of installation:

Installation phase (e.g. 1st Fix, 2nd Fix):

Are there any contraventions of the Regulations? Yes No

If yes to the above, how many contraventions have been identified in each fluid category?

Fluid Category 1:

Fluid Category 2:

Fluid Category 3:

Fluid Category 4:

Fluid Category 5:

Has the installation been installed in a workmanlike manner? Yes No

Comment on general standard of workmanship/other relevant detail:

Contravention notice issued/rectification actions agreed? Yes No

Follow up inspection required? Yes No

Date of follow up inspection (if known):

Additional WIAPS audit(s) required? Yes No