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# **Water Industry Approved Plumbers Scheme (WIAPS)**

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## **RPZ Valve Tester Sector Audit Procedures and Guidance**



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VERSION 1

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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 there are checks to verify competence. These checks 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.

Verifying ongoing competence activities may include administration audits, onsite audit, annual online assessment or periodic refresher training. This document primarily covers administration auditing and onsite auditing of members.

Audits are 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.

The definitions set out in the '*RPZ Valve Tester Sector - Terms and Conditions of membership*' apply within this document.

## 2. Audit Drivers

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

- **Application check** – a check will be carried out by WIAPS upon receipt of an application to join WIAPS. Applicants may be required to provide information and where necessary supporting evidence as may be required. This may include information on, but not limited to, RPZ testing qualification, report forms for Commissioning Procedure and Compliance Testing, RPZ test equipment calibration records/certificates, and appropriate public liability and business insurance.
- **Administration audit** – an audit of WIAPS members by a water company to ensure paperwork is in compliance with the AIM; and individual members remain actively testing RPZ valves; return a list of active WIAPS members and numbers of testers performed to the Scheme.
- **Scheme Compliance checks** – annual checks will be completed by the Scheme before membership is renewed. This may include, but not limited to, checks to establish if testers are active; qualifications are being kept up to date; suitable records of test equipment and its calibration records/certification are being maintained; members details are up to date.
- **Membership audit** – a routine audit of a WIAPS member may be triggered by; random selection; receipt of an RPZ Commissioning Procedure and or Compliance Test reports; or as the result of an event/incident or a complaint being received.

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.

## 3. Audit Requirements:

The primary purpose of an audit is to ensure a member is complying with the Regulations, the AIM 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 onsite audit. This may not be possible for Membership audits resulting from a complaint or triggered by an event or incident.

Further checks will be carried out by water companies, on the number of reports issued by individual members (for compliance with Regulations and the AIM). During an audit, the auditor should ask to see the members records to check on the numbers of tests undertaken, or reports being issued.

## 4. Annual checks and administration audits

### Scheme Compliance

Each Individual Member will be subject to checks at the time of application and at renewal of membership, or following an Individual Member's change of employer. The Scheme will carry out checks, at least annually, to:

- Establish members remain active and their details are up to date.
- Review qualifications are up to date, where they are time limited, or remain appropriate in case of changes to the AIM or the Regulations, or that qualifications have expired.
- Require evidence that suitable records are being maintained for RPZ test equipment the member is using, including calibration records and or certificates. Typically, by providing suitable calibration certificate.
- The appropriate level of insurance required on each WIAPS Business Member and confirm that Individual Members are still employed by a current Business Member.

### Administration audit

Water companies will carry out checks to establish:

- Test report forms are compliant with the current AIM and resolve any discrepancies with the Individual Member. Where issues are not resolved water companies will refer this to the Scheme Manager, who would then consider what action should be taken, in line with the Scheme disciplinary code.
- Individual Members are actively testing RPZ valves. Water companies will submit returns, at least annually, detailing which WIAPS members have been active in their area and the number of Commissioning/Compliance tests that they have performed.

These checks may identify anomalies which may trigger further investigations or membership Audits.

## 5. Membership Audits

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 have appropriate knowledge, qualifications and or experience for the scope of work being audited. This includes the requirements of the AIM, and where appropriate the Regulations and also be fully aware of the requirements of the Scheme.

The Water companies' administration teams will usually be responsible for the Administration Audit. Membership audits can be initiated randomly or by a specific driver. These audits may be carried out by the Scheme or by water companies subscribing to WIAPS.

### 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.

Membership audits should also be used to build working relationships with the member and to offer advice and guidance to the member about the AIM, the regulations or any updates to scheme rules.

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 water company's powers of entry. Where the premises to be inspected is a non-household premises, the appropriate Water Retailer will need to be informed of the visit.

A member should not refuse to co-operate with an audit request. 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 Onsite Inspection

The onsite inspection should cover all aspects of the AIM and the relevant parts 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 RPZ valve's compliance. Alternatively an audit could be completed at a water company premises. Notes should be made at each stage of the inspection and if non-compliance of the AIM or of the Regulations are found the member is to be informed. The purpose should be to seek resolutions to any concerns at the time of inspection, together with an agreed timescale for any actions. 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. 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 AIM, the Regulations and Scheme requirements with the member.

Where a member fails an audit, it would also be prudent to discuss aspects of the AIM, 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 RPZ Valve Testers' course or other appropriate training.

### The Report

Each water company may have its own non-compliance procedure and relevant documentation, which will record an audit, and all contraventions or other observations 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 to 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 any 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 or corrective actions are required on the inspected systems it is expected that re-inspection will be carried out as part of the incumbent water 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 electronic records of audits which will include 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.

## **6. 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.

## **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 commissioning or testing reasonably meets the requirements of the AIM or the Regulations.

In the first instance the auditor must be clear that:

- a contravention with the regulations clearly exists or a non-conformance with the AIM; 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. Review**

This document has been reviewed and endorsed by the WIAPS Coordinating Group.

