



ENERGY &
UTILITY SKILLS

Skills for a greener world

Competent Operator Scheme

Scheme Operating Manual

2nd Edition V2.1



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Document Control

Version	Date	Change detail	Section
V1.0	2020	Revised 2 nd Edition COS Manual containing 10 principles instead of 13 principles to reduce overlap and enhance principles 9 and 10	All
V2.0	March 2023	Updated document with: <ul style="list-style-type: none"> • The COS recertification specification and extension of scope approach • Appendices (One -Mapping template, Two- Site visit Specification, Three- Surveillance and Monitoring process), • Figure 1. Initial Process <ol style="list-style-type: none"> 2. Initiation of surveillance report process 3. Surveillance Report review • 4. Recertification process flow chart are included in this version 	7 & 8 9
V2.1	June 2023	Rebranded with Energy & Utility Skills Group branding	All

1 Introduction

1.1 About Energy & Utility Skills Group

We provide membership, assurance, and skills solutions to help employers in the utilities sector attract, develop, and retain a sustainable and skilled workforce.

Our UK-wide membership includes the major infrastructure companies within the gas, power, water, and waste management industries – as well as the supply chain and contractors.

Within the Energy & Utility Skills Group we have EUIAS (the sector's apprenticeship end point assessment organisation), the National Skills Academy for Power (NSAP) and EUSR (the sector's online register for training, skills and sometimes authorisations and qualifications).

1.2 Scheme Overview

This scheme manual defines the requirements of the Water Industry Competent Operator Scheme (COS) and provides industry guidance on meeting these requirements. The scheme is designed to provide employers with the flexibility to achieve results through utilisation of existing systems and procedures wherever possible. COS offers a non-prescriptive framework focused upon a series of clear and robust principles and outcomes. This framework will enable each business to demonstrate conformance with all legislative, regulatory and industry competence requirements. The existing Occupational Standards for a Water Process Technician provide a suite of primary competence requirements that a company may use for their COS, although other relevant Water Industry Standards may be used for specialist job roles as necessary.

This document is the 2nd Edition of the Manual and supersedes the initial version, first published in 2017 linked to [Principles of water supply hygiene | Water UK](#). Following the introduction of the first edition, the water industry companies initiated the processes described in the scheme manual, and the majority have now been audited and have achieved COS Certification, which has a **five-year** validity. The learning points from that exercise have been incorporated within this edition, along with an appendix that covers the monitoring and surveillance process, which occupies an important milestone at the mid-point between certification and expiry.

2 Structure

This edition of COS incorporates **ten** clearly defined, industry established Principles that define the requirements that each business must operate within. Each Principle is then described in more detail, thereby enabling a business to consider their existing policy and procedures relating to each requirement. Evidence of how each requirement is being satisfied by the business is then collated and maintained in a manner deemed appropriate to each business. This evidence and the systems, procedures and processes used to operate and manage the COS is then audited by EUSR to facilitate both initial certification and subsequent re-certification.

3 External Initiation Process

EUSR recognises that each organisation currently operating within the UK Water Industry has policies, procedures, systems, and operating instructions to meet their statutory requirements. The purpose of the COS is to enable all organisations in scope to review their current competence management framework, map their approach to the COS requirements, identify any gaps or potential improvements and reinforce their approach as necessary. Having completed this review, the COS then enables an organisation to obtain external endorsement and recognised certification.

The process to achieve COS Certification starts with engagement with EUSR who will provide all the information necessary for an organisation to achieve success. The organisation may then make a formal application to initiate the audit and certification process, with an appropriate timeframe included. An organisation may, depending upon size, complexity and other related factors, need additional external support to establish their COS prior to external audit. Alternatively, an organisation may wish to set a provisional timeline for the audit process, although this will clearly be subject to external requirements such as the expiry of existing certification.

4 Internal COS Process

Having obtained the COS Operating Manual and considered the Principles and requirements that the scheme is based upon, the organisation should identify all existing policies, procedures and systems that contribute to meeting them. To help companies compare their existing approach against

the COS Principles and requirements, a mapping template is provided in Appendix One. When the organisation is confident that their existing approach to each requirement is robust and meets the criteria contained within the COS, a summary of this operation should be documented and added to the organisation's own COS Operation Document, which will form a starting point for the external audit. This document should provide a summary explanation of how the company manages and operates its COS to satisfy each of the ten principles. The document does not necessarily need to be a lengthy or extremely detailed piece of work; the objective is to document how the company scheme operates to meet the principles. Examples such as system screen shots, existing organisation charts and/or other process documents can often be useful as appendices that help describe how the COS fits together.

Mapping each COS Requirement against current operational methods may identify gaps or perceived weaknesses in either delivery, consistent application or recording. These are common features of many competence management models and, being non-prescriptive, the COS framework provides the opportunity to address any such issues in the most appropriate way for each organisation.

While the mapping process should address each Principle in turn, it is important to also recognise how the requirements overlap and collectively deliver the outcome required. For example, Principle 3 is concerned with the development of policies and procedures, while Principle 4 covers the implementation of those policies etc.

Once the organisation has reviewed its competence management approach, mapped it against the COS requirements, addressed and closed any gaps, the next step is external recognition. Prior to that step however, the organisation should ensure that all relevant personnel, particularly those involved in the management and operation of the COS, are briefed on the scheme and how their role contributes to its continued successful maintenance. The organisation should take ownership and maintain their COS treating it as an important internal policy not as an external requirement owned and maintained EUSR.

Once the organisation is confident that all the requirements of the COS are satisfied by their approach (this may be determined through whatever method

the organisation chooses, but an internal audit is often helpful in achieving this step) then the external audit may be scheduled with EUSR.

The external audit will be conducted by an EUSR appointed auditor, with Water Industry operational knowledge and expertise. The organisation being audited must nominate a COS Co-ordinator who will act as the primary contact for liaison between EUSR and the organisation. The audit will be carried out in two parts (i) a desktop review of the organisation's COS Operation Document, and (ii) a site-based visit (or visits if the organisation's size, complexity and structure mean that one single site visit would be insufficient to ensure that all requirements are met across the whole organisation). More specific detail about the audit requirements, overall duration, site visits, estimated costs and additional organisation personnel involvement, may be discussed with EUSR once an application for Certification is made. Prior to the commencement of the audit, these requirements will be agreed and set out in an Agreement to be signed by both parties.

5 Audit Process and Outcomes

The audit will commence with a desktop review of the organisation's COS Document, which should provide a comprehensive explanation of how the organisation meets each Requirement. A clearly mapped and comprehensive COS Document will provide the auditor with a thorough understanding of the organisation's approach and how it is operated and managed.

The second part of the audit follows naturally from the COS Document review, and enables the auditor to check that the policies, procedures, systems, and processes identified in the Document, are being deployed, operated, and managed in the field. During this part of the audit, the auditor will need to examine relevant evidence such as training and assessment records, management reports, risk assessments, operational procedures etc. Sampling will be used as appropriate, to allow the auditor to establish an overall assessment of the organisation's COS operation. The organisation's COS Co-ordinator will need to accompany the auditor throughout this stage, to clarify any points raised and provide additional information to aid the audit process. Additional information about the site visit, to assist the company representatives in organising facilities and resources needed on the day, is included as Appendix Two.

Following the external COS audit, the organisation will be informed of the outcome via the designated COS Co-ordinator and receive a written report of the findings within 30 days.

Having examined the evidence documented in the organisation's COS Document and assessed in practice during the site visit(s), the audit findings will result in one of four possible outcomes:

1. The organisation's COS is found to meet all the requirements set out in the Industry COS Manual and is therefore approved for Certification.
2. The organisation's COS is found to contain minor non-critical gaps in respect of the requirements set out in the Industry COS Manual. Certification may still be approved together with a requirement for an interim monitoring visit within the next 12 months.
3. The organisation's COS is found to contain minor gaps in respect of the requirements set out in the Industry COS Manual, but Certification may be approved once corrective actions to close these gaps are shown to have been implemented. This will necessitate a further audit review visit at a time agreed with the company.
4. The organisation's COS is found to need significant corrective action to meet all the requirements set out in the Industry COS Manual and Certification may not be approved at this stage.

Once a COS Certificate has been awarded, it shall be valid for a period of five years. The process for Certificate renewal may be initiated at any time after four years from the date of issue. This is to allow sufficient time for audit scheduling etc. and, if renewal is approved prior to the original expiry date, the new Certificate shall be effective from the original expiry date.

COS certificated companies are subject to surveillance, which will occur approximately 30 months after initial certification. This surveillance is designed to ensure that the processes and operation that achieved certification in the first instance are being managed effectively and continue to deliver the outcomes required. There is more information about the surveillance process in Appendix Three of this document.

6 The Ten COS Principles and Requirements

1. Identify Operational Activities and Assess Risks

1.1 The identification of risks and control measures associated with all operational activities carried out by the organisation

Explanation

The organisation must have policies, procedures, and a form of operational instructions for all the key activities that its personnel or contract labour carry out on their behalf. Using those documents as a starting point, each key activity must be risk assessed to identify potential risks to drinking water quality. Each risk assessment should incorporate appropriate mitigation and control measures that must be adopted and used whenever the specific activity is carried out. An appropriate recording method must also be established to enable the effective management of drinking water quality.

Potential Existing Sources of Evidence

Standard Operating Procedures and/or Method Statements

Risk Assessment Policy, Procedure and Records

Drinking Water Safety Plan

Treatment Operation and Maintenance Strategy

Competence or Skills Matrix

Job or Role Descriptions

Capability Analysis for Specific Operations

Training Plans and Records

Additional General Information

Whatever sources of evidence are used, it is important that the company can map their evidence against each requirement. This will enable both the company (prior to any external audit) and ultimately the COS auditor to easily clarify that requirements are being met, or for gaps or weaknesses to be identified and addressed.

2. Select Competence Standards

2.1 Identify appropriate Competence Standards for personnel in scope

Explanation

The competence of individuals must be based on an objective assessment made against a predetermined Standard. Where a Water Industry Standard exists for a role (eg. Water Process Technician) then that Standard should be used for staff carrying out those activities. Where a Water Industry Standard

does not exist, then other recognised standards may be used to provide robust criteria, particularly where requirements are mandated, recommended, or supported by a Regulatory authority, or a collective industry body (an example is the National Water Hygiene scheme). In the absence of any industry recognised standard, then the company may need to define and establish a discrete set of criteria, for their own use. **Note:** Clearly a broader, externally recognised standard offers a more transferable outcome to both the company and its personnel but establishing a clear and robust standard for specific roles is the essential point, even if that standard is limited by internal recognition only.

Potential Existing Sources of Evidence

Water Industry Standards
National Occupational Standards
Industry recognised Qualifications
Water Process Technician Standards
National Water Hygiene Scheme Requirements
Drinking Water Inspectorate Documents

3. Determine COS Policy, Processes and Procedures

3.1 Establish Policy, Aims and Objectives for COS

Explanation

This requires an explanation of how the organisation currently manages its operation using competent people to carry out the necessary activities, expressed in a way that is consistent across the industry. The Aim should be a single clear and concise statement that aligns with a clear policy that is understood across the company, and the Objectives should be defined in SMART (Specific, Measurable, Achievable, Realistic and Time bound) terms. It is expected that internal processes will already exist and these, following internal review to check for robustness, should be included as an important section of the organisation's COS Operation Document. This document should include the scope of the COS (potentially initially Water Treatment Works) and who is responsible for key aspects.

Potential Existing Sources of Evidence

Existing Policies, Procedures and Method Statements
Operational Instructions
Training and Assessment Plans
Job and/or Role Descriptions with skills and experience criteria
Competence Framework

Annual Performance and Development Reviews

3.2 Define the Roles and Responsibilities of those involved in the COS

Explanation

Many people will be involved in the successful operation of the COS. There must be clear support and commitment from the very top of the organisation, ideally demonstrated by a well-publicised policy statement, and this message should cascade throughout the business at the appropriate level of COS knowledge, understanding and implementation. Clearly some people will have a more critical “hands on” role in operating and managing the COS. The scheme, deliberately, does not specify who must do what or how the COS should be organised. This is for the organisation to determine and will usually enable existing policies, procedures, and work practices to be incorporated and delivered by the organisation’s management and personnel in the same way as before. Those in management or supervisory roles may also be accountable for monitoring consistent operation of the scheme, and also for periodic reporting against the elements they are operationally responsible for. Clearly, where any gaps in the current approach are identified during the implementation of the COS, these must be addressed. How these gaps are addressed, and who should be involved in any design or operation of new processes and procedures is entirely the decision of the organisation’s management. Once a structure and definition of those involved in the various aspects of COS delivery is agreed, this should be included in the organisation’s COS Operation Document.

Potential Existing Sources of Evidence

- Corporate Vision Statement
- Board level commitment Statements
- Management Audit Reports
- Performance and Development Review Records
- Organisation Structure Charts
- Job and/or Role Descriptions
- Management Instructions
- Training and Development Plans and Records
- Process Documents
- Competence Framework or Matrix
- COS Briefing Notes and/or Presentations

3.3 Develop Procedures and Work Instructions to operate the COS

Explanation

This requirement seeks to ensure that the competence development and subsequent deployment of resources is managed effectively through a suite of consistent, robust processes and/or method statements. A well operated scheme requires documentation in the aspects of recruitment (ie. specification of any entry requirements where they may exist), training and assessment to appropriate levels of competence, delivered by competent trainers and assessors. This requirement also incorporates the deployment of these skilled and competent people in an appropriate manner, taking account of any restrictions on any specific activities, or alternatively, the approach to integrate newly qualified people, or people recruited from other organisations. The COS must incorporate the delivery and management of operational activities that occur “outside of normal hours” to handle either planned, unplanned or emergency circumstances and events.

Potential Existing Sources of Evidence

Standard Operating Procedures
Training Plans and Records
Trainers and Assessors Records
Internal and (if appropriate External) Verification
Competence Framework and/or Matrix
Work Operation Instructions
CPD Records
Internal Audit Reports

4. Implement COS Policy, Processes and Procedures

4.1. Implement COS Operation Policy

Explanation

Meeting the requirements of the COS depends upon the organisation’s senior management having a clear understanding of what is needed, and then establishing a set of policies, procedures, systems, and processes that may enable that aim to be achieved. This in turn will require the communication and dissemination of these policies, procedures and processes throughout the organisation, with clear instructions for personnel involved in the delivery of the COS. Much of this material is very likely to exist already and a combination of existing policies, procedures and process, together with a summary of the organisation’s commitment and strategic approach will meet this requirement.

Potential Existing Sources of Evidence

COS Commitment Statement
Policies, Procedures and Processes
Management Instructions

Training and Development Plans

4.2 Establish Competence Framework

Explanation

This refers to the identification of the competence and capabilities needed to carry out specific activities on behalf of the organisation. Although it clearly incorporates those Technical Competences needed by Technicians and Engineers, the requirement also covers those involved in training, assessing, supervising and managing all personnel involved in aspects of the COS. The organisation should establish a framework to ensure that all those people in specific job roles hold the competences required. For new entrants to achieve this, the framework should also incorporate the approach to training, assessment and probationary (where necessary) work experience prior to operational deployment. Once deemed competent all personnel should be subject to periodic review (often annually) to ensure that competence is maintained.

Potential Existing Sources of Evidence

Job and/or Role Descriptions
Training and Assessment Policy
Training and Development Plans
Training and/or Assessment Records
Performance Management Policy and Process
Refresher Training Programme
Recruitment Policy and Procedures

4.3 Determine Training and Assessment Policy

Explanation

Having established a clear and well communicated Policy on the organisation's approach to the COS as an overall approach, this requirement applies that to the Training and Assessment of new entrants and existing employees. The company should establish a clear policy on this important aspect that sets out the principles, aims and objectives of the company's approach to training and the assessment of competence. This should include the use of training plans, incorporating the factors that contribute to successful delivery such as: who manages the process and who carries out the training and assessment, where the training is delivered (centre based or on-site, or a combination of both). Training Programmes should always incorporate an Aim and set of SMART Objectives to ensure that the required

competence outcomes are met. Company policy towards the retention of training records is also important within this requirement.

Potential Existing Sources of Evidence

COS Policy Statement

Training and Assessment Plans and Programmes

Periodic Refresher Training Programmes

Job and/or Role Descriptions of Trainers and/or Assessors

Training Records System Data

Individual Personnel Review Information

Organisation Structure

4.4 COS Performance, Development and Maintenance Policy

Explanation

Once the organisation has established a competent workforce, this requirement is focussed upon the maintenance of that situation and the development of the workforce for the sustainability of the organisation going forward. A typical Policy will contain a commitment to a periodic review (usually on an annual basis) of an individual's competence to undertake their role (that may change over time). Procedures to implement the Policy will establish the method to be used, who should carry out the review and what the expected outcomes should be. The review outcomes should include any development needs identified and an action plan to address them, which may include reference to the Training Plan (see Requirement 4.3) as required. Where necessary (see Requirement 5.4), the action plan should also include any short-term changes being made to ensure that activities may continue (such as additional supervision or other support).

Potential Existing Sources of Evidence

Personnel Performance and Development Policy

Development Review Programme

CPD Records

Performance Review Records

Development Action Plans

Individual Training Plans

5. Train, Assess and Develop Personnel

5.1 Assess the Training and Development needs of Individuals

Explanation

Based on an initial analysis of the competences needed for specific operational roles, the personnel in those roles need to meet those competence requirements. This may be achieved through the achievement of recognised qualifications or alternative means that deliver equivalence, such as long held experience or recognised Industry certification. The most important point is that the organisation can confirm that the individual has the competence required. In simple terms, what methods does the organisation use to determine that an individual has the necessary skills, knowledge and understanding to carry out the activities within their job role. These will probably differ depending upon the role, eg. Whether it's a Technical, Supervisory or Management role, and be dependent on the Training itself. For example, where centre-based training is delivered, a standard observed assessment against defined criteria may be the most appropriate. This may (or may not) also be the most appropriate for workplace assessments, although for some work activities simulation might be required due to safety or water hygiene considerations. The COS does not prescribe what type must be used, it is for the organisation to determine the most appropriate and effective method(s) to achieve the outcomes needed.

Over time however, many factors may change that could impact the operational requirements. Aspects such as Legislation or Regulations, new Technology, Equipment or Work Practices may all evolve. Therefore, the COS requires that a process exists to review the Training and Development needs to all personnel, ensuring that they maintain alignment with any changes. Any new entrants must also be specifically included in any process, as their needs may be wider ranging and subject to additional safeguards as necessary (such as a period shadowing etc., as appropriate).

Potential Existing Sources of Evidence

- Training and Development Policy
- Training Plans and Programmes
- Capability Analysis
- Competence Matrix
- Operational Requirements
- Industry Standards and Guidelines
- Job Role Descriptions and Requirements
- Training Records
- Development Review Records
- Site Specific Requirements Documents
- Recruitment Policy and Procedures
- New Entrant Induction Programme
- Refresher Training Programme

Aims and Objectives
Internal Certificates
Test Records

5.2 Train and Develop Individuals

Explanation

Having established and documented Training and Development needs for individuals as defined in 5.1, this requirement is focussed on the planning and delivery of the inputs designed to achieve the end results. Aspects such as where training takes place (own centre, third party location or normal workplace), who delivers it (internal resources or external agents), when training occurs (in blocks maybe for new entrants), what interim testing will be incorporated (if any) and how the aim and objectives of the training align to the operational needs of the organisation.

Potential Existing Sources of Evidence

Training and Development Policy
Skills and Competence Matrix
Training Plans and Programmes
Training Schedule and/or Booking Records
Trainer CVs (if internal personnel)
Third Party Training Organisations information (if used)
Refresher Training Programme
Development Review Procedure, Plans and Records

5.3 Assess the Competence of Individuals

Explanation

As with the previous requirement, this requirement is focussed upon the delivery of assessments, in line with the approach determined to meet requirement 5.2. Similar aspects such as where and when assessments should take place, who will carry them out and what assessment criteria will be used should be included. Where the records are held, for how long and whether an assessment, or set of assessments generate the issuing of any certification (either internal or externally awarded) should also be included.

Potential Existing Sources of Evidence

Training and Development Policy
Skills and Competence Matrix
Assessment Plans
Assessment Schedule
Assessor CV's (if internal personnel used)

Third Party Assessing Organisations information (if used)

5.4 Manage Individual's Gaps in Competence

Explanation

While the organisation will seek to minimise any occurrence of gaps in competence, through the measures described in the COS Document, the organisation must also have a procedure and processes in place to manage situations where gaps are identified. Clearly, the procedures and processes documented to meet 5.1 and 5.2 should be robust enough to fill the gaps via additional training and assessment if those solutions are deemed appropriate. However, there may be some instances where gaps have been identified that seem unlikely to be effectively closed with any amount of additional training. This may be due to a wide range of personal or behavioural circumstances that are outside the scope of the normal training and development. Whatever other actions the organisation decides upon, this requirement is for an appropriate procedure and process to exist that ensures that safe and effective operations may continue. This may involve the replacement of an individual on certain activities, pending further measures, or alternative solutions. Again, the COS is not prescriptive about the exact content of the procedure, only that an effective one exists.

Potential Existing Sources of Evidence

Training and Development Policy
Operational Procedures
Training and Assessment Records
Individual Action Plans
Development and/or Performance Reviews
HR Policies, Procedures and Communications

6. Control Operational Activities

6.1 Ensure that Individuals only carry out activities they are competent for

Explanation

Personnel must feel able to acknowledge their limitations and range of competence. Only when this occurs will personnel act accordingly and be unwilling to accept tasks that they are unable to carry out in a competent manner. Where an individual has doubts about their competence, they must be able to seek help or advice, without fear that this may lead to detrimental consequences for their employment. Instead, to meet this requirement, the organisation should seek to build and establish an open and non-threatening approach to work allocation, that enables any concerns to be raised. This

requirement is for the organisation to document, communicate and implement the Policy, Procedure, and operational Processes it uses to manage this aspect effectively.

Suggested Sources of Evidence

HR Policy and Procedure
Operational Procedures
Risk Assessment Policy
Near Miss Policy and Records
Employee Briefings and/or Presentations
Job Role Descriptions
Work Activity Instructions
Performance Review Records
360^o or 1-2-1 Feedback
Resource Schedules and Contingency Plans
Whistleblowing Policy
Grievance Policy and Procedure
Disciplinary Policy and Procedure

6.2 Ensure that work activities are only allocated to competent individuals

Explanation

This requirement sits alongside the previous one 6.1 to facilitate the outcome that work activities are only carried out by competent people. To achieve this, the organisation's work allocation and resource scheduling processes must take account of the competence of those undertaking the work. While this may be identified as relatively straightforward during periods of normal, planned workload, the organisation's Policy, Procedure and Processes must also incorporate situations when, for any reason, normal work allocation and/or scheduling is rendered impossible. Emergency operations or large-scale unavailability of resources possibly due to illness are two examples that illustrate the possibilities. The organisation may adopt and implement any appropriate approach, provided that it maintains drinking water quality and mitigates any risk of non-competent personnel carrying out tasks that they are not competent to do.

Suggested Sources of Evidence

HR Policies and Procedures
Operational Procedures
Employee Briefings and/or Presentations
Job Role Descriptions
Work Activity Instructions
Performance Review Records

Resource Schedules and Contingency Plans
Emergency Operations Procedures

7. Monitor and Assess Performance

7.1 Determine how Competence is Maintained over Time

Explanation

Having established, through needs analysis, training, and assessment that personnel hold the competences needed to carry out the activities within their role, the requirement is focussed on actions to maintain that competence over time. Changes in Regulations, Work Practices or Technology are examples of aspects that are likely to evolve over time and it is important that the organisation has a robust approach to ensure competences remain in alignment. Effective communication with the workforce will be essential to ensure that personnel recognise the need for continuous personal development and some form of periodic review will usually be incorporated. An annual review is often used, and this may incorporate competence within a wider range of items such as Operational Performance, Health Monitoring and/or the meeting of previously set targets.

Potential Existing Sources of Evidence

Training and Development Policy
Employee Briefings and/or Presentations
Operational Instructions
Development Review Plans and Schedules
Personal Development Plans
Individual Performance Reviews
Action Plans
Job Reports
Feedback reports from Managers, Peers and/or Customers

7.2 Update the Competence of Individuals to respond to Change

Explanation

Although related to 7.1, this requirement is focussed more specifically on how the organisation deals with a more significant change. Major change projects may be relevant here, or wholesale adoption of new plant or equipment, requiring a wide-ranging review of competence requirements, maybe across a whole department or business unit. While 7.1 is concentrated upon the marginal addition or enhancement of competence at the individual level, this requirement is focussed at the group, or whole business level. Such change may occur because of a planned business decision or be required by external

factors such as a Regulatory Notice or an unforeseen event that has competence management implications.

Potential Existing Sources of Evidence

Organisation Business Plan
Strategic Planning Documents
Operational Reports
Internal Audit Reports
Root Cause Analysis
Lessons Learned Documents

7.3 Establish the means of Competence Re-assessment

Explanation

This requirement connects the identification of any competent refreshment need or additional competence need, to a process that facilitates the delivery of necessary inputs and restores the situation to full operational competence. This need may have been necessitated by a change at the individual level, either due to a role change, infrequent exposure to certain types of work, or simply loss of confidence. Alternatively, the need for re-assessment may have been necessitated at the company level, either by the introduction of new technology or a change in operations policy. In any event, the steps taken to identify and implement any necessary re-assessment should follow the steps highlighted in 6.1, 5.3, 5.4 and 7.2 The procedure designed to achieve this should incorporate how re-assessment may be triggered (either through a regular scheduled review process, or via a specific management intervention) and links directly to Requirements 6.2 and 7.4.

Potential Existing Sources of Evidence

Training and Development Policy
HR Policy on Performance Management
Refresher Training Programme
Personal Development Reviews and/or Plans
Competence Cycle Documents
ISO 55001 Audits

7.4 Establish the means to Manage Performance

Explanation

This requirement is about the Procedure and Processes used to ensure that the organisation's personnel and teams, understand their operational objectives and work effectively to achieve them. Clearly an important aspect of this requirement is effective communication of the organisation's vision and

expectations to the workforce, as is the commitment to facilitate effective performance through the provision of appropriate tools, equipment and management support. Providing opportunities for teams to share experiences and review operations to identify potential improvements or new risks is recognised as an effective way to generate improved performance. Having explained the overall purpose and importance of Performance Management, this requirement covers the setting of individual SMART objectives and the process for reviewing them on a periodic (usually annual) basis. This review may be linked to the organisation's remuneration and reward process if required, but this is not necessary for conformance with the COS.

Potential Existing Sources of Evidence

HR Policies and Procedures
Employee Briefings and/or Presentations
Team Reviews of own operations
Analysis of Incidents
Performance Development Plans
Performance Review Planning and Schedule
Individual Action Plans
Management Reports

8. Keep Records

8.1 Maintain and Manage Records

Explanation

A description and explanation of how the organisation holds the various records, reports and information relating to the management and operation of the organisation's COS. Primary information will include individual training, assessment, authorisation and certification records as well as the source of relevant Policies, Procedures and Processes that contribute to the effective management and delivery of the COS. The organisation should also include who is responsible for various aspects of record keeping (such as data entry, report submission, system access, portfolio completion and sign off etc.). The COS Document should state how long specific records will be retained and who may access them.

Potential Existing Sources of Evidence

HR Policies and Procedures
Training Records System and Processes
Competence Matrix
Job Role Descriptions
Administration Organisation Structure

9. Internal COS Auditing

9.1 Establish Monitoring and Review Processes

Explanation

How the organisation monitors the COS to ensure that the Policies, Procedures, Systems and Processes that have been designed and implemented to deliver it, are operating effectively, consistently and in accordance with management expectations. The company's COS Document should describe and explain how monitoring will be undertaken and by whom. It is expected that this monitoring will be carried out to sample activities across the organisation to ensure a consistency of delivery and participation. The frequency of any specific monitoring is for the organisation to determine but should reflect any initial risk assessment and take account of any previous reports. It is often the case that the various component aspects of a COS sit in different parts of the business, and are overseen, managed and operated within separate directorates. Where this is the case, but in any event, it is important to establish who is responsible for reporting on the operation of the COS as a whole. How regularly, and by whom, the information gathered will be reported back to the executive or senior management should also be included. In any event, the outcomes of monitoring and/or internal auditing of aspects of the COS should be recorded and reported to senior management, as a minimum, on an annual basis. This information will provide the basis of the future Surveillance and monitoring report, which is independently reviewed mid-way through the five-year certification period by EUSR.

The information gathered through the internal monitoring and auditing processes must be retained for a minimum of five years and these records form a key element of the surveillance process. More information about this process may be found in Appendix Three.

Potential Existing Sources of Evidence

- Risk Assessment Policy
- Management Reports
- Audit Procedure and Process
- Job Role Descriptions
- Audit Reports
- Internal Feedback and Reports

10. COS Evaluation

10.1 Evaluate the COS Operation and Performance

Explanation

Having monitored the COS operation and reviewed the consequential reports and any observations collected as a result, the company's executive or senior management should evaluate the success of the scheme and identify any weaknesses or gaps. Where a need for improvements is identified, the potential root causes for these should be analysed to determine how amendments made be introduced to address the issues. How clear communication with relevant internal parties will be carried out to resolve any areas of concern should be included in the COS Document. More information about the surveillance process and its requirements may be found in Appendix Three.

Potential Existing Sources of Evidence

Management Reports
Minutes of Management meetings
Audit and Evaluation Reports
Action Plans

10.2 Implement COS Improvements

Explanation

Having carried out a review and evaluation of the COS operation, the organisation management will need to communicate the outcomes to everyone involved. Where there are amendments or changes to be made to the COS then a procedure and process should be established to implement them in an appropriate and timely manner, with all personnel responsible for specific aspects clearly briefed on new arrangements and the date for implementation. All COS changes should be documented, and the organisation's COS Document updated accordingly. Confirmation reports that the planned and scheduled changes have been implemented and are operational should be required from those responsible and retained as part of the COS Document file. Action and implementation plans designed to close any gaps, or enhance the performance of the scheme, together with future monitoring processes to ensure that actions are followed up and resolved are important aspects to be recorded. This information will contribute to the retention of COS certification through the mid-term surveillance milestone that occurs halfway through the five-year validity period. More information about the Surveillance Report Process and procedure is contained in Appendix Three.

Potential Existing Sources of Evidence

Management Briefings and/or Presentations
Evaluation Report
COS Improvement Plan

7 Company Recertification Specification

7.1 Introduction

This Specification relates to the re-certification process for water companies operating the industry agreed Competent Operator Scheme (COS), developed in 2018. Once agreed by an industry Steering Group, the scheme was then rolled out across the GB Water Industry, with the first certification audits also being completed in 2018. The initial audit process was completed in two stages, the first being a desktop review of a submission by each company that explained how their COS was operated and managed, followed by a subsequent site audit visit to confirm that the scheme met the 13 Principles as set out in the COS manual.

Prior to the launch of COS, Company Certification was established to last for five years. Following the expiry, an audit process would be introduced to facilitate re-certification. In addition, to maintain focus on the continued operation of the COS during the five-year period, an Interim Surveillance process to operate midway through the five-year period was agreed. This process enabled companies to submit evidence that their COS remained robust and operational in line with the scheme Principles.

The first COS certificated companies will require re-certification in 2023 and this Specification explains how this may be achieved, and describes the approach and criteria being adopted.

7.2 The COS Re-certification Process

The COS Re-Certification process has been designed to provide a means of ensuring that a company's COS continues to operate in accordance with the current scheme requirements (2nd Edition COS Manual), in the most streamlined cost-effective way. The desktop audit stage has been removed completely, with the re-certification audit based on a scheduled site visit, usually conducted by the same auditor who was involved before, subject to that auditor's availability.

The scheme requirements, as specified in this revised 2nd Edition COS Manual containing **10** Principles, will be used for COS re-certification when the initial **five-year** certificate expires.

The generic specification and criteria to be used for the site visit audit is included in this Specification and outlines key aspects of the scheme that the auditor will want to discuss during the visit. **In addition to these Principles**, the auditor will follow up on any recommendations or observations made in the three previous COS Audit Reports ([i]initial desktop and [ii] site audit reports that led to certification, plus [iii] the outcome of the interim Surveillance Review) and discuss the scheme operation in its entirety.

7.3 COS Re-Certification Specific Criteria

The Re-Certification Audit Specification will focus on particular Principles of the COS that have previously revealed themselves as particularly important for the health of the scheme and have sometimes proven challenging for companies. These are:

7.3.1 COS Ownership

Accountability at a senior level for the COS, integrated entity needs to be clear and understood within the organisation. In addition, a single person should have responsibility for oversight and monitoring of the scheme and reporting back to the designated accountable senior manager or Director. Recognising that the COS incorporates the involvement of several different departments and processes, it is essential that oversight occurs across the whole “end to end” scheme, to ensure that issues that may occur in one department, do not compromise the scheme as a whole.

Plans should also be in place for an effective handover of the oversight and monitoring responsibilities, should the incumbent responsible person either leave the organisation or change their role.

7.3.2 The interface between training and operations (Principle 6 in 2nd Edition)

This Principle encapsulates the need for the scheme to operate as an integrated single entity. Ensuring that only competent people are able to carry out specific tasks is a critical operational requirement. This process also contributes to the Risk Profile of the organisation and must therefore be subject to regular effective monitoring control.

7.3.3 Internal Auditing and Evaluation (Principles 9 &10 in 2nd Edition)

Maintaining the COS as a robust and cost-effective operational scheme may only be achieved if periodic internal auditing and evaluation takes place. It should be clear who carries out the auditing and the company should have a documented process for this to occur on at least an annual basis.

Documenting the outcomes of internal reports is essential and, while the COS does not specify the particular format of the audit reports, they should cover each of the Principles and include observations, finding and recommendations that require action. The reports should be “signed off” by the relevant senior manager or Director, with actions reviewed and closed down in a controlled manner.

Similarly, scheme evaluation should be carried out on a periodic basis, on at least an annual basis. The purpose of the evaluation being to identify if any changes or improvements may be considered to either enhance the operation of the scheme, improve the efficiency, or increase the cost effectiveness of the scheme. As with the Internal Auditing requirements, observations, findings, and recommendations should be captured and reported back to the designated scheme owner.

7.4 Post Site Audit Report

In line with the previous audit process, following the site visit an Audit Report will be produced containing observations and the findings of the visit. The report will also include a recommendation regarding COS re-certification of the company.

Should any significant issues be identified during the site audit, these will be highlighted in the report, together with a recommendation of actions required within an appropriate timescale.

Provided that these actions are completed and closed in accordance with the requirements and timescale specified, re-certification may still occur, with COS certification deemed continuous.

Only if the COS is either found to be no longer meeting the scheme Principles to a significant degree, or the company fails to carry out the specified remedial work contained in the audit report, re-certification will be refused. In this unlikely case, a company would need to review their COS, correct the identified issues, and then re-apply for COS Certification. The full (as with the initial certification) audit process would then be required to achieve COS Certification.

7.5 Summary

The development of the COS was, from the very start, based on the principle that it should be non-prescriptive. Rather, the scheme must enable Water Companies to utilise their existing systems and processes to meet a set of generic Scheme Principles.

Implementation of the COS to date has achieved this objective and the re-certification process is designed to continue this approach in the most cost effective and efficient way.

The external auditing of COS is essential to reinforce the scheme as a credible model, and EUSR and the audit team have always acted in a supportive role, seeking to help with advice and guidance on the scheme requirements wherever required. This approach will continue into the re-certification process and through to the next five-year certification period.

8 Scope Extension Approach and Process

8.1 Introduction

The COS is now well established across water supply companies with the first certificated organisations heading towards re-certification in 2023. Some companies have expressed an aspiration to extend the initial scope of the COS, to other parts of their organisation. This note provides more information about this concept and how EUSR intend to approach the issue.

Extending the scope of COS is entirely feasible and is a decision for water companies to make. Extending is not mandatory, nor is the extension of the scope of external audit.

However, if a company successfully embeds COS into wider parts, or all of its organisation, holding an externally recognised certificate that covers the whole scheme is logical. EUSR are committed to supporting any water company wishing to extend their COS and are ready to assist in that process.

8.2 The existing scope

The scope of COS was originally established for personnel involved in processes relating to water quality, particularly Water Quality Technicians/ Water Technicians. It covers everyone (management and operational) involved in the treatment of water to deliver good quality drinking water. The scheme facilitates a model that provides an “end to end” approach to ensure that risks are assessed, standards determined, appropriate training and assessment is planned, delivered, and recorded, resources are deployed correctly and the whole model is monitored, audited, and evaluated regularly.

8.3 The current position

The scheme has been embraced by the industry and welcomed by the Drinking Water Inspectorate (DWI) Regulator. It continues to operate on a five yearly certification cycle, managed and audited by EUSR through a supportive, non-prescriptive process that seeks to help companies meet the COS requirements.

8.4 Extending the scope

Once a water company embeds the COS into their organisation, they own it and therefore may apply the principles of the scheme to other parts of the organisation, as and when they decide to. Some companies have already

started to explore this approach and many already use processes used within COS on a wider basis. A company's training record system for example, is often used for all employees, not just those involved in water quality. Similarly, a water company will have processes for risk assessment that cover risks broader than those within the existing COS scope.

8.5 External COS auditing

If a water company wishes to extend the scope of COS to other parts of its organisation, it is free to do so and the range of such an extension is entirely the company's decision. Having decided to extend the scope of COS it is also possible for a company to seek Certification for the whole scheme, including those departments and parts of the organisation they have recently incorporated into COS. It is important to note that this is not mandatory, but optional and something that may be introduced at a later date, once the new additions (in terms of departments, processes and/or personnel) are fully aligned.

EUSR are ready to assist any water company in the process of extending their COS scope and will gladly provide advice and guidance on the approach. Once a company has decided to extend COS, an agreed timetable will need to be determined jointly, regarding when the external re-certification audit will also incorporate the additional parts of the organisation. This timetable will depend on a range of factors including the size and scale of the "new, revised" COS and where the company is on the existing re-certification five yearly cycle. With good planning, this may be delivered in a seamless manner with the company, if it chooses, extending the scope of COS in stages over more than one cycle. Until such time that any extended COS becomes incorporated, the existing scheme (with its original scope) will continue to be audited by EUSR on the five yearly cycle. This of course, does not preclude a company from introducing and operating the COS approach and principles across any or all of its organisation at the same time.

8.6 Extended audit costs

Given that any extension of COS would always be company specific and could vary significantly in range, scope, and size, it is impossible to establish a fixed cost for the external audit of an extended COS.

However, it is possible to set out the methodology that will determine the cost of such an audit. The EUSR approach will be to base the additional audit cost on the extra time needed to ensure that the additional parts of the business are aligned with those already certificated and are themselves

meeting the COS requirements. This additional time will be one of the important aspects of the agreed planning exercise to determine the timetable for any extension of the externally audited, and later certificated COS.

9 Appendices

9.1 Appendix One: COS Mapping Template

Company:	
Author:	
Date:	

The purpose of this document is to enable a Water Company to compare their management and operational approach to the competence of personnel in scope, against the Principles and Requirements of the Industry agreed COS. These Principles and requirements are explained in more detail in the COS 2nd Edition Manual.

This template is designed to enable an internal analysis of the active policies, processes and procedures operating within the company. Where any gaps or weaknesses are identified, the template provides a basis for the company to initiate appropriate actions to either develop or change the current approach to strengthen the company's approach.

The template is primarily for internal company use and is not required as evidence to be provided as part of the external audit process. However, a completed template may be included as part of a COS submission, **but only as optional supplementary information to support the company's COS Operations document**, which must be the core document submitted for audit. This is because the company COS Operation Document needs to be recognised as defining the essential operational competence management processes alongside other important company policy statements.

The tables below are intended to facilitate comparison between the Principles and Requirements of the Competent Operator Scheme (COS) and the Company's existing approach to the management of competence.

General Questions	
<p>This information helps position the COS in terms of Company size and scale:</p> <ul style="list-style-type: none"> - Does your COS Operation Document explain how many employees, in scope to the COS, you currently employ? - Are all the offices or sites your business operates from clearly described in your COS document? - Who is responsible for COS oversight and management, and is this made clear in the document? 	
<p>Mapping your existing approach to the COS Requirements:</p>	
<p>Principle 1: Identify Operational Activities and Assess Risks</p> <p>1.1 The identification of risks and control measures associated with all operational activities carried out by the organisation.</p>	
Questions	Observations
<ul style="list-style-type: none"> ➤ What are the key activities that affect Water Quality and are these clear and documented? ➤ Are all these activities Risk Assessed? If so, how, when and by whom? ➤ Are all employees involved in these activities aware of their roles and responsibilities? ➤ How are Risk Assessments recorded and is this information readily available? 	

➤ How are mitigations actioned, implemented, and reviewed to ensure improvements are realised?	
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Principle 2: Select Competence Standards 2.1 Identify appropriate competence Standards for personnel in scope		
Questions	Observations	Status
<ul style="list-style-type: none"> ➤ All Water Process Technicians are in scope to the COS. Other roles will also contribute to the effective operation of the COS. Is it clear which roles are included in the Company's COS? ➤ What Standards are being used within the Company, to ensure that employees within the identified roles are competent? ➤ Do Job Role Descriptions used by the Company contain clear competence requirements? ➤ Do all the employees in scope to the COS understand the level of competence required of them? ➤ Do all employees in scope to the COS have access to the appropriate Standards and Work Instructions that they are required to meet? 		

Principle 3: Determine COS Policy, Processes and Procedures

- 3.1 Establish Policy Aims and Objectives for the COS
- 3.2 Define the roles and responsibilities of those operating the COS
- 3.3 Develop Procedures and Work Instructions to operate the COS

Questions	Observations	Status
<ul style="list-style-type: none"> ➤ Has a defined Purpose and Aim been established for the COS? ➤ Do the Company Policies, Procedures and Processes support the COS? ➤ Is it clear who is responsible for specific aspects of the COS and do those people understand the contribution needed from them? ➤ Are work instructions used? If so, are they clear and widely available? ➤ How does Management and Supervision operate across the Company and is there consistency across locations and/or units? ➤ How are unexpected events managed and resolved? ➤ What recording processes are used and maintained to ensure that Water Quality is safeguarded? 		

Principle 4: Implement COS Policy, Processes and Procedures

- 4.1 Implement COS Operation Policy
- 4.2 Establish Competence Framework
- 4.3 Determine Training and Assessment Policy
- 4.4 Determine Performance and Development Policy

Questions	Observations	Status
<ul style="list-style-type: none"> ➤ Are the Company Senior Management committed to COS and how is this demonstrated? ➤ Do Company Policies and Strategic Plans reflect a commitment to COS? ➤ Is there a comprehensive competence framework in place that demonstrates how competence is achieved? ➤ Is the Training Policy clear and well understood by personnel? ➤ Does the Company operate a Performance and Development scheme that aligns with the approach to Training? ➤ Are all employees in scope to COS included in the Training and Development approach? ➤ Is it clear how specific groups such as new recruits are integrated? ➤ Is Training or Assessment delivery outsourced? If so, how are all providers included in meeting the COS requirements ➤ Are Training and Assessment facilities fit for purpose? ➤ Is it clear how any identified competence shortfalls will be handled? ➤ Is there evidence available that will demonstrate how the Policies, Procedures and Processes operate successfully? ➤ How are Training Records held, how long for and by whom? ➤ How are the Policies, Procedures and overall approach reviewed, how often and by whom? 		

➤ Are the training, assessment and development processes monitored regularly and subject to annual audit?		
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Principle 5: Train, Assess and Develop Personnel

- 5.1 Assess the training and development needs of Individuals
- 5.2 Train and develop individuals
- 5.3 Assess the competence of individuals
- 5.4 Manage individual's gaps in competence

Questions	Observations	Status
<ul style="list-style-type: none"> ➤ What method is used to determine the Training and Development needs of each employee in scope to the COS? ➤ How often are needs reviewed and by whom? ➤ When are Training Needs actioned and what process is used for approval? ➤ Are Development Needs always reviewed and, if so are they always approved? ➤ Do Training Needs align to Job Role Descriptions ➤ Does the evidence of recent Training analyses align to the Company Training Policy? ➤ Do Assessments always align to Training Objectives? ➤ Do all employees in scope to COS have an up-to-date Training Plan? ➤ Are the Training Records of individuals robust? ➤ Is Training delivered by competent personnel? ➤ Are assessments carried out by competent assessors? 		

<ul style="list-style-type: none"> ➤ Have previous identified gaps been effectively addressed? ➤ Does sufficient evidence exist that demonstrates COS conformance? 		
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Principle 6: Control Operational Activities 6.1 Ensure that Individuals only carry out activities they are competent for 6.2 Ensure that work activities are only allocated to competent individuals		
Questions	Observations	Status
<ul style="list-style-type: none"> ➤ Is there a robust and effective work allocation process in place? ➤ Does the process used take account of the need to align competences with activities? ➤ What happens in unexpected or emergency circumstances? ➤ Who operates the work allocation process, and do they understand the importance of the competence dimension? ➤ Are employees able to question/refuse work that they are not competent to do? ➤ If alternative resources are needed due to the above, how is that managed? ➤ Are job records retained and reviewed to identify any reported concerns regarding competence related performance? ➤ Is there a process to close any loops with particular employees? ➤ Is this process monitored regularly and subject to annual audit? 		

Principle 7: Monitor and Assess Performance

- 7.1 Determine how competence is maintained over time
- 7.2 Update the competence of individuals to respond to change
- 7.3 Establish the means of competence reassessment
- 7.4 Establish the means to manage performance

Questions	Observations	Status
<ul style="list-style-type: none"> ➤ How does the Company manage performance over the short term ie. Weekly or monthly? ➤ Who is responsible for managing performance? ➤ Is there a longer term (usually annual) formal performance review process that includes all employees in scope to the COS? ➤ Does the Policy and any associated Procedures clearly explain the performance management process and the importance of maintaining competence? ➤ Are employees encouraged to take ownership of their skills and competence and to keep them up to date? ➤ Are there employee welfare processes in place to help people adopt to changes that impact upon them? ➤ If significant operational changes are necessary, how does the company confirm that performance remains aligned with new requirements? ➤ Are these processes subject to regular monitoring and annual internal audit? 		

Principle 8: Keep Records

8.1 Maintain and manage records

Questions	Observations	Status
<ul style="list-style-type: none"> ➤ Is there a robust recording system that incorporates Training Needs, Training and Assessment and any actions required? ➤ Where are the records held and how long for? ➤ Who is responsible for entering the data and are they competent? ➤ Who has access to the records and how are they monitored to ensure that operations are aware of any issues? ➤ Are reports produced on a periodic basis? If so, how often and by whom? ➤ Who receives any reports, and what do they do with them? ➤ If reports indicate a need for actions, are they initiated promptly? ➤ Does the record system(s) feature in any periodic review of the COS operation, to identify any potential improvements? ➤ Is there sufficient evidence to demonstrate COS conformance? 		

Principle 9: Internal COS Auditing

9.1 Establish monitoring and review processes

Questions	Observations	Status
<ul style="list-style-type: none"> ➤ How is the COS monitored and by whom? ➤ When does any review take place and is there a Policy and Procedure that underpins it? ➤ How are the outcomes of monitoring reported and to whom? ➤ Does senior management receive regular reports? ➤ Who is responsible for acting on any report findings? ➤ If potential improvements are identified in a report, what is the process for approval, implementation, and review? ➤ Does the internal audit process generate evidence that would demonstrate that the monitoring and surveillance processes are sustainable? ➤ Is information gathered through regular monitoring recorded and retained as evidence that this process operates? ➤ Are annual internal audits carried out? ➤ Are the audit reports recorded and retained for inclusion in the mid-term surveillance report? ➤ Are employees invited to participate and input their views? ➤ Does sufficient evidence exist that demonstrates conformance with the COS Principles? 		

Principle 10: COS Evaluation

10.1 Evaluate the COS operation and performance

10.2 Implement COS improvements

Questions	Observations	Status
<ul style="list-style-type: none"> ➤ How does the Company measure the effectiveness of the COS? ➤ Who is involved in the evaluation process and are employees included? ➤ Does the evaluation process examine the COS as one integrated management system approach? ➤ Who receives the results of the evaluation? ➤ What is expected to happen following the evaluation? ➤ What process is used to design, implement and monitor any changes to the COS after the evaluation? ➤ Does Company Policy support the operation of COS in a clear manner? ➤ Do all employees in scope to COS have an appropriate level of understanding about the COS and how it operates? ➤ Are the outcomes of any evaluation activities documented in a manner that would demonstrate that the process is sustainable over time? ➤ Is the evaluation process linked effectively to the internal auditing process? ➤ Does evidence exist that demonstrates conformance with the COS principles and requirements? 		

9.2 Appendix Two: Site Visit Specification

9.2.1 Introduction

Once a water company has submitted a document explaining how their approach to the management of competence meets the Principles and Requirements of the COS, it will be subject to a desktop audit. **(Initial submission only)**

The desktop audit will review the document (and any supplementary material) submitted, to gain an understanding of the company's approach and determine the degree to which the scheme, as presented, meets the COS Requirements. At this stage it may be necessary to request additional information from the company and, if this is the case, the desktop audit will remain open until any additional material has been considered. **(Initial submission only)**

Once the desktop audit is complete, an audit report will be returned to the company. The report will highlight specific aspects that the auditor intends to discuss during the site visit. It is highly likely that every desktop audit will identify some aspects that may only be fully understood once discussed with relevant company personnel during the site visit. **(Initial submission only)**

The auditor will follow up on any recommendations or observations made in the three previous COS Audit Reports ([i] initial desktop and [ii] site audit reports that led to certification, plus [iii] the outcome of the interim Surveillance Review) and discuss the scheme operation in its entirety. **(Re-Certification only)**

The site visit will normally take place at one location and should be completed within one day. Any likely exceptions to this will be subject to discussion between the company and EUSR prior to a site visit date being scheduled. To facilitate consistency during the planning stage, and to establish a single point of contact able to respond to any pre-visit questions from the company, EUSR will provide the company with a named contact who will carry out that role.

9.2.2 The Purpose of the Site Visit

Having gained a good understanding of the company approach and its alignment to the COS Principles and Requirements through the desktop

review of documents, the site visit is intended to confirm conformance. **(Initial submission only)**

To achieve this, the auditor will, through discussion with company personnel and received demonstration of specific processes and/or systems, determine if the company's approach may be certificated as meeting the COS Requirements.

To ensure that the site visit is successful, the following aspects should be addressed prior to the day.

9.2.3 Site Visit Criteria

- The company should nominate a member of staff to co-ordinate the day and make the necessary arrangements. (This may be the person responsible for the drafting of the desktop submission but does not have to be.)
- Key personnel accountable for specific aspects of the COS (e.g. Training and Assessment, Drinking Water Quality Scientist (or equivalent DWSP accountable person) Production Management, Record Keeping etc.) should be available during the day, for dialogue with the auditor.
- A suitable location with a meeting room should be provided, with facilities to access systems and present information likely to be relevant to the site visit. It may be necessary to see specific systems referenced in either the original submission, or in the desktop review report.
- Using the previous reports as a guide, the company co-ordinator should ensure that any appropriate additional information is provided on the day (either verbally by an appropriate member of staff, or via supplementary material being presented or demonstrated)

9.2.4 Planning the Day

The site visit is intended to provide the company with an opportunity to further demonstrate the effectiveness of their approach to COS. The auditor's task is to confirm that the information presented in the submission, that satisfied the desktop review stage, accurately reflects how the company approach is managed "on the ground".

To ensure that the site visit meets everyone's expectations, it is recommended that the company co-ordinator communicates regularly with EUSR prior to the day. This will enable all aspects of the visit to be discussed and agreed before the auditor arrives on site.

9.2.5 Following the Site Visit

Following the external COS audit, the company will be informed of the outcome via the designated COS Co-ordinator and receive a written report of the findings within 30 days. To enable the audit team to carefully consider the information and evidence presented during the site visit before confirming the outcome, any decision on conformance and certification will not be provided on the day.

In some cases, following the site visit, additional information or clarification may be requested by the auditor. If this is necessary, the auditor will contact the company by email to make the specific request. Where this occurs the 30-day timescale may be exceeded, pending closure of the auditor request.

9.3 Appendix Three: COS Surveillance and Monitoring Process

1.0 Introduction

This document explains the purpose, timing, approach and process requirements of the COS Surveillance and Monitoring aspect of the scheme. The Surveillance and Monitoring stage is an essential component of the overall COS approach; continued certification is contingent upon a successful completion of this stage by each company at the appropriate milestone.

2.0 Background

The current Competent Operator Scheme (COS) was introduced, following endorsement and agreement with an industry Steering Group, in 2018. The scheme is supported by the Drinking Water Inspectorate (DWI) and since its introduction, has been successfully rolled out to 16 water companies across Great Britain.

The COS Manual itself describes the whole scheme in detail, with each Principle explained as a separate element. It is important to emphasise, however, that a successful COS approach must operate the whole scheme as an interconnected entity, rather than as a series of disparate processes.

The existence of the Surveillance and Monitoring section is essential to ensure that each company maintains its COS management approach over time. Gaining initial COS certification is a significant achievement that only occurs following considerable company effort, commitment of personnel and a robust external audit process. Surveillance and Monitoring is designed to ensure that, once a company scheme has been certificated, the necessary processes are maintained on a sustainable basis to build on the initial success.

3.0 Purpose and Scope

As explained, the purpose of surveillance and monitoring is to underpin and reinforce the processes and methods used by a company to meet the COS Principles and achieve certification. The scope of the surveillance and monitoring exercise is aligned to the existing COS Principles and, in simple terms, requires that a company is able to demonstrate that the processes and procedures that facilitated the initial successful outcome of certification, remain in operational “good health”. Clearly, over time it may have been necessary for a company to make changes to their scheme, for a wide range of reasons. The surveillance and monitoring process is perfectly able to accommodate any such changes, requiring only that a rationale forms part of the surveillance and monitoring report submitted to EUSR at the 30-month milestone. More information about the report requirements are included in section 5.

4.0 Timing, Initiation Process and Cost

Following the date of initial COS certification, each company is required to successfully complete the interim surveillance and monitoring stage, approximately 30 months later. This process is straightforward and, if the processes and procedures established to achieve initial certification have been maintained and remain robust, should not pose any challenges. Figure 1 below outlines the surveillance submission initiation process.

To ensure that the company is prepared for the surveillance milestone, it is essential that appropriate internal audit and monitoring processes are embedded by management in line with the audit and evaluation Principles of the scheme (Principles 9 and 10 in COS Manual 2nd Edition). Effective regular monitoring and annual internal reports to senior management are expected to generate the content required for the surveillance submission report to EUSR at the 30-month milestone. An explanation of this report, the required content and the subsequent review and decision process may be found in the next section.

4.1 Cost

The monitoring and surveillance process requires additional EUSR administration, and a desktop assessment of material submitted by the company mid-way through the five-year certification period. This work is chargeable to the water company and the provision of a Purchase Order must be agreed prior to the commencement of work.

5.0 The Surveillance Report

Designed to align with the dual COS requirements of internal audit and evaluation, the purpose of the surveillance report is to demonstrate that the company is continuing to operate a robust COS approach. The surveillance report does not create any new requirements and instead asks for evidence that the original COS approach, that achieved initial certification, has and continues to be operated and maintained in a robust manner.

Following the same non-prescriptive approach used for the COS, as a whole, it is for each company to determine how the surveillance report requirements are presented in a report. That said, and as previously indicated, each COS certificated company is expected to operate an appropriate internal monitoring process for its COS. In turn, that monitoring process is expected to lead to, as a minimum, an annual COS internal audit report that is presented to senior management in line with COS Principle 9: Internal Audit

In parallel to the internal audit process, the COS requires a similar approach towards the company evaluation of the effectiveness and efficiency of the scheme. Companies may either combine the audit and evaluation processes, or alternatively operate them independently. Whichever approach is adopted, the outcomes of both will provide a good source of information for the surveillance report. (see Principle 10 of the COS 2nd Edition)

In summary, the surveillance report should confirm that the COS remains operationally robust, with all the processes, procedures and systems that facilitated initial COS certification still in place. The expectation is that the internal audits against the organisation's processes are signed off by a person in an authoritative role. If, for operational reasons, some or all of these processes etc. have been amended, then an explanation of the changes made should be given, together with a rationale that confirms no adverse effect on the COS.

The surveillance report needs to demonstrate the company's continuing compliance with COS Principles 9 and 10 and, ideally, contain (i) evidence generated from internal audit and evaluation reports (ii) minutes of meetings where these reports were presented to senior management (iii) subsequent

actions initiated and signed off as complete, and (iv) any supplementary information referring to COS amendments, additions, or changes.

6.0 Surveillance Report Review

Following receipt and acknowledgement of the surveillance report and within four weeks, EUSR will carry out a desktop assessment of the report against the following criteria, to determine the appropriate response and outcome. If necessary, telephone discussions may be initiated with the company's primary COS contact, to clarify any issues or to request additional information.

6.1 Surveillance Report Criteria

Relevant evidence demonstrating the company approach to:

1. regular internal COS monitoring in line with Principle 9
2. annual internal COS audit and subsequent reporting to senior management in line with Principle 9
3. internal evaluation of COS performance reported to senior management in line with Principle 10
4. actions initiated following audit/evaluation in line with Principle 10

Supplementary information (such as: Management Reports, Audit Procedure and Process changes, minutes of meetings, employee briefings etc) may be used to reinforce the report and confirm the company approach to ongoing COS monitoring and maintenance.

7.0 Review Outcome

The surveillance report review will determine the appropriate outcome, which may be one of the following three options:

1. The report is accepted as confirmation that the company COS continues to operate as a robust approach.
2. The report contains substantive gaps that require remedial action to demonstrate that the company COS remains operationally robust.
3. The report does not meet the surveillance criteria and raises a significant risk that the approach operated by the company no longer meets the COS Principles

Following completion of the review EUSR will confirm the outcome decision in writing, together with the relevant next steps. These are clearly outcome decision dependent and are as follows:

- If the review outcome decision is option 1, the company will receive written confirmation that their COS remains aligned to the COS Principles, with no remedial action required. COS certification will remain valid for a further 30 months until the original certificate expires.
- If the review outcome decision is option 2, EUSR will engage with the company to discuss the review findings and a timetable for necessary remedial work to be completed, prior to the delivery of a written report that explains the review outcome in detail and highlights the gaps identified. In all cases, remedial work must be completed within three months of the surveillance report review date.
- If the remedial work is accepted as complete and robust within the agreed timeframe, EUSR will confirm this in writing. COS certification will then remain valid until the original expiry date ie. 5 years from the date of initial certification. If the remedial work is either not completed within the three-month period or does not restore the COS to its certificated condition, then certification may be suspended, pending an additional site audit. This effectively resets the clock and initiates a new COS audit process.
- If the review outcome is option 3, the company will receive a written report that provides a rationale for the decision and serves notice that company COS certification has been suspended with immediate effect. Restoration of certification will depend upon (i) company action being initiated to ensure the COS operates in line with all COS Principles, and (ii) an additional site audit of the company's approach to confirm that it conforms to the scheme requirements. Once this audit has confirmed that restoration of certification is appropriate, a new COS certificate will be issued, with the standard five- year validity, subject to the standard 30-month surveillance and monitoring process.

Clearly, whenever decision options 2 or 3 are needed, communication and engagement with the company involved will be essential to ensure that the value and benefits of COS are reinstated as soon as possible. It is worth reiterating that COS was, and still remains, a framework built to help water companies manage the competence of their workforce. It should never be seen as a challenge, or a threat and EUSR remain committed to helping companies achieve their wider aspirations.

8.0 Flowcharts

Four flowcharts are included at the end of this document.

Figure 1 shows the Initial application, audit, and certification process.

Figure 2 shows the initial stages of the surveillance and monitoring process, which involves the internal audit and evaluation processes of the company being implemented effectively. EUSR will initiate the request for a surveillance report two years after the original COS Certification date. The aim is that the surveillance report will have been completed and submitted for review to EUSR no later than six months after this request date, given that the requirement for ongoing monitoring and maintenance is a core requirement of the scheme (Principles 9 and 10 of the COS Manual [2nd Edition]) and the information needed for the surveillance review should be readily available.

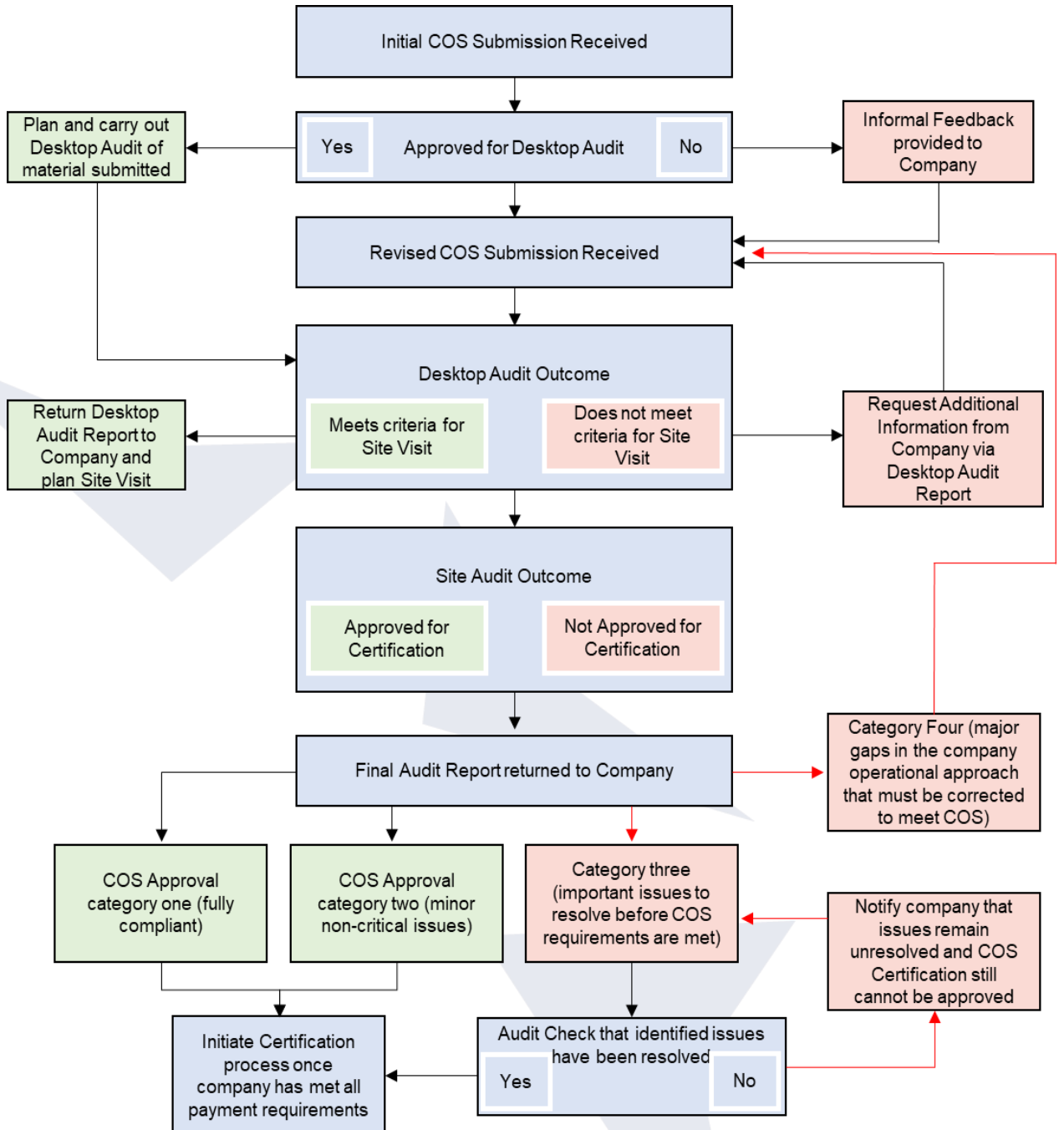
Figure 3 shows the surveillance report review process, together with the outcome decision options and subsequent implications for each.

Figure 4 shows the re-certification process, together with the outcome decision options and subsequent implications each as outlined in section 7 of the manual.

9.0 Summary

The surveillance and monitoring elements of COS are essential to ensure that all companies operate their schemes on a sustainable basis. It is inevitable that, over time, changes occur that may impact on various aspects of any competence management scheme and regular internal monitoring and reporting offer the most effective method of addressing issues and maintaining a robust approach.

Figure 1. Initial Process (Initial Application, Audit and Certification)



**Figure 2. Initiation of surveillance report process
(Initial and Re-certification)**

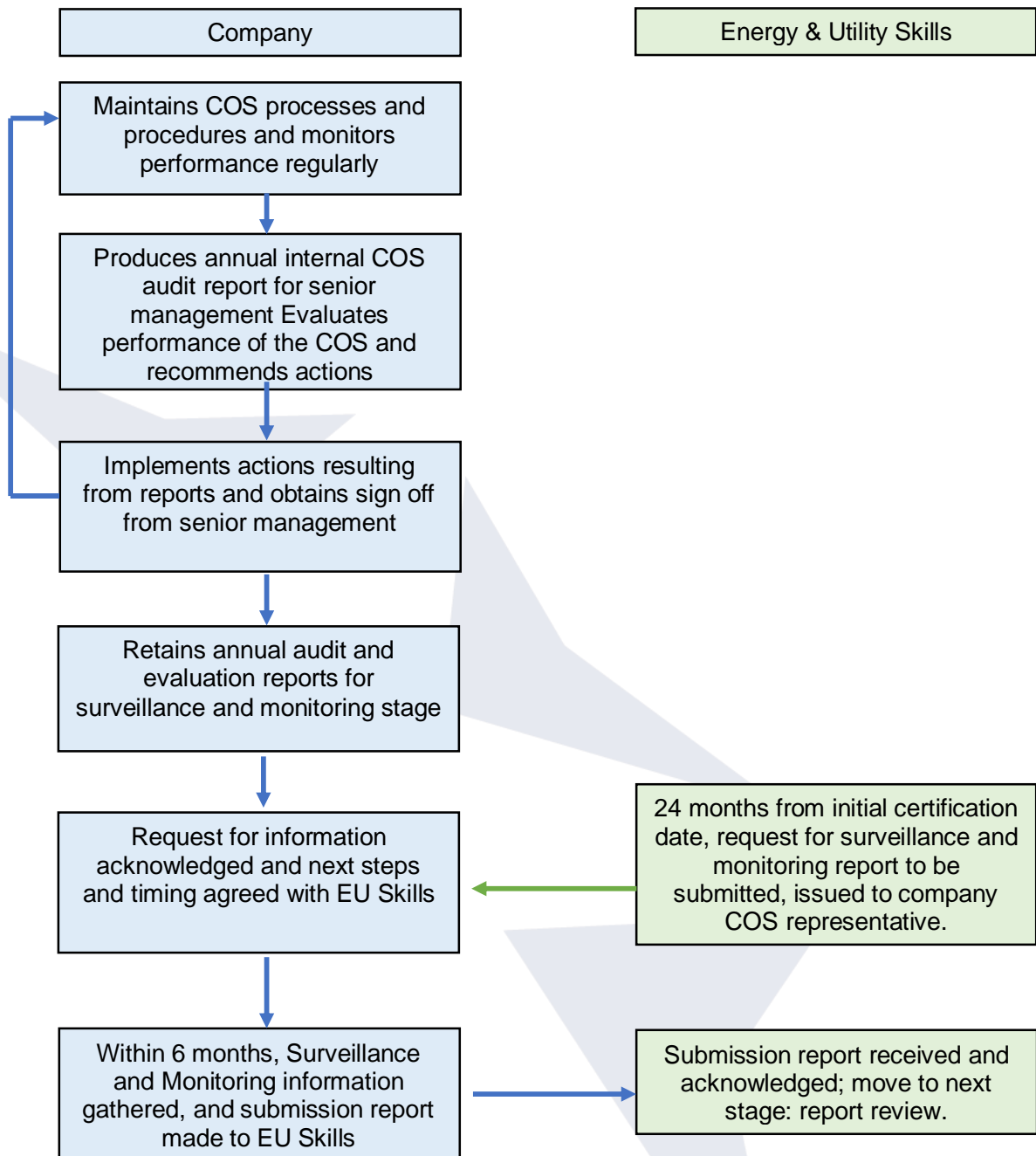


Figure 3. Surveillance Report Review Process (Initial and Re-certification)

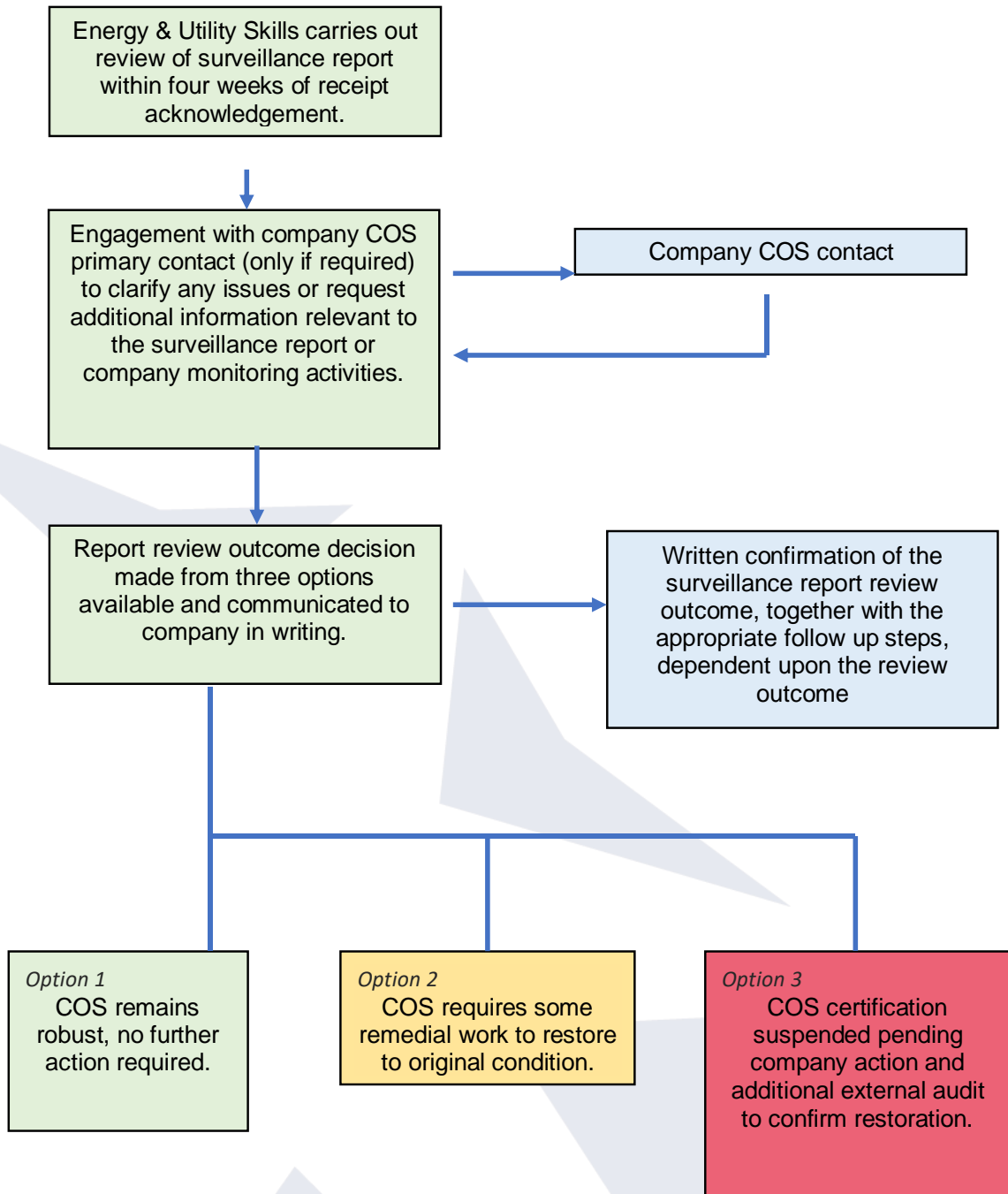
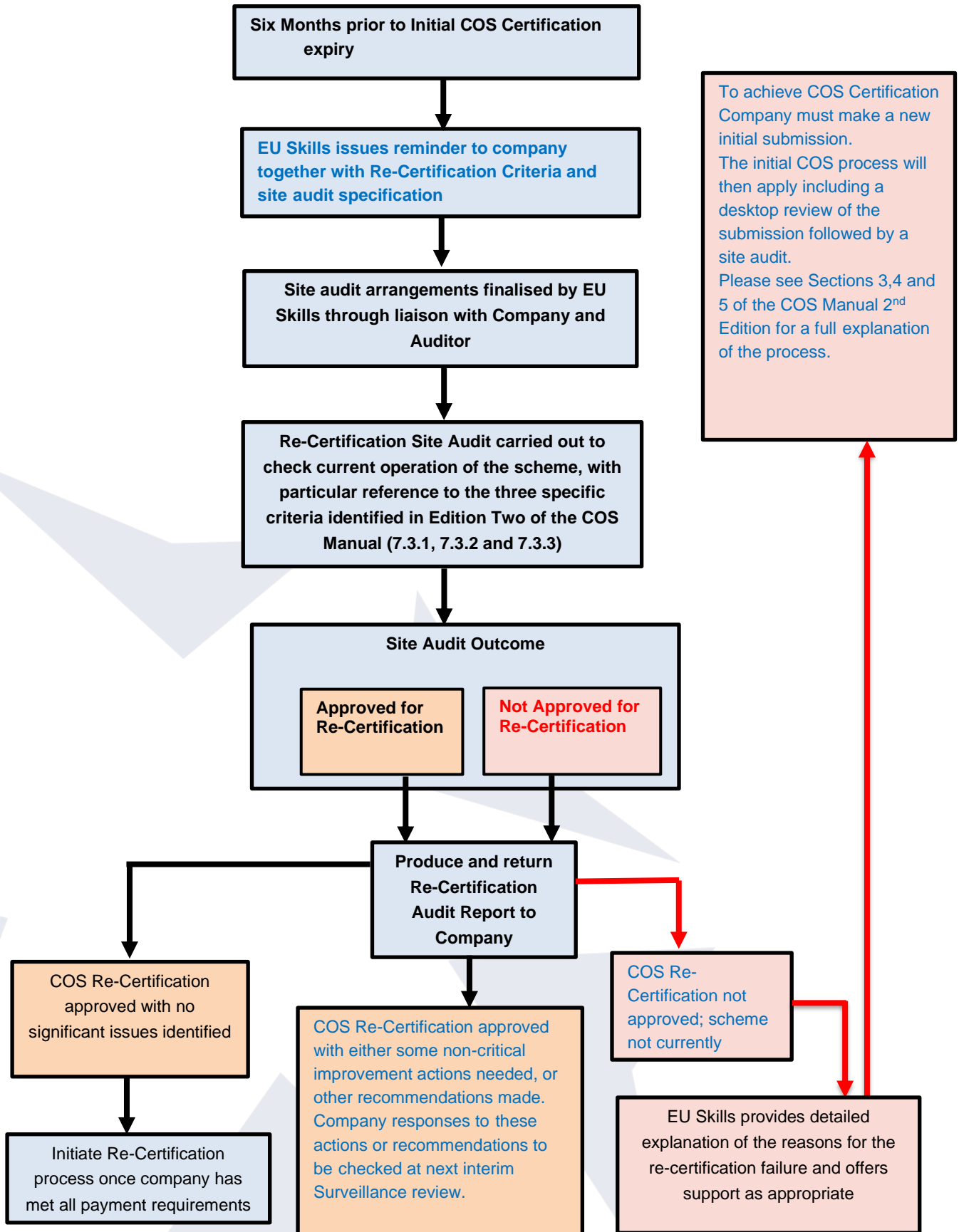


Figure 4. Re-certification Process



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