FOR DISCUSSION PURPOSES ONLY

OCTOBER 2006

This draft Protocol is being provided for discussion and consultation purposes only. The format, content and proposed wording of the Protocol is subject to change.

Accreditation Protocol For Operating Authorities

Defined Terms

"Accreditation" means the granting of a Certificate of Accreditation by the Accreditation Body to the Operating Authority of a Subject System;

"Accreditation Audit" means an audit of the PLAN and DO requirements of the DWQMS;

"Accreditation Body" means the auditing organization recognized by MOE, that is responsible for the accreditation of Operating Authorities;

"Accreditation Services" means the services provided by the Accreditation Body pursuant to this Protocol for auditing and accrediting the Operating Authority of a Subject System;

"Audit" means a systematic and documented verification process that involves objectively obtaining and evaluating documents and processes to determine whether a Quality Management System conforms to the requirements of the DWQMS as required by the Director's Direction;

"Auditor" means a person engaged by the Accreditation Body to conduct an audit for the purposes of accrediting or maintaining the accreditation of an Operating Authority;

"Certificate of Accreditation" means a document issued by the Accreditation Body to an Operating Authority demonstrating successful completion of Accreditation in respect of a Subject System;

"Director" means a Director as appointed by the Minister under section 6 of the *SDWA* for the purposes of section 16 of the *SDWA*;

"Director's Direction" means the Director's Direction for Operational Plan Submission issued under subsection 15(1) of the *SDWA*;

"Documentation Review" means a process by the Accreditation Body to verify that an Operating Authority has developed and provided all of the necessary documentation for the accreditation process to proceed;

"Director's Direction" means the Director's Direction for Operational Plan Submission issued under subsection 15(1) of the *SDWA*;

"Drinking Water Quality Management Standard (DWQMS)" means the most recent Quality Management Standard approved by the Minister in accordance with section 21 of the *SDWA*;

"Management Committee" means a joint committee established by MOE and the Accreditation Body to review and provide advice on the development and provision of Accreditation Services;

"MOE" means the Ministry of the Environment;

"MOE Project Representative" means the individual designated by MOE as the primary contact for accreditation issues;

"Municipal Residential Drinking-Water System" means a Large Municipal Residential System or a Small Municipal Residential System as defined in O. Reg. 170/03;

"On-Site Verification Audit" means a process by an Auditor to verify that a QMS has been implemented that meets the PLAN and DO requirements of the DWQMS;

"Operating Authority" means, in respect of a Subject System, the person or entity that is given responsibility by the Owner for the operation, management, maintenance or alteration of the Subject System;

"Operational Plan" means, in respect of a Subject System, the Operational Plan required by the Director's Direction;

"Operational Subsystem" means a part of a Municipal Residential Drinking-Water System operated by a single Operating Authority and designated by the Owner as being an Operational Subsystem;

"Owner" includes, in respect of a drinking-water system, every person who is a legal or beneficial owner of all or part of the system, but does not include the Ontario Clean Water Agency or any of its predecessors where the Agency or predecessor is registered on title as the owner of the system*;*

"Quality Management System (QMS)" means a system to:

(a) establish policy and objectives, and to achieve those objectives, and
(b) direct and control an organization with regard to quality;

"*SDWA"* means the *Safe Drinking Water Act, 2002,* S.O. 2002, c. 32, as amended;

“Subject System” means:

(a) a Municipal Residential Drinking-Water System where the system is operated by one Operating Authority, or

(b) an Operational Subsystem where two or more parts of a Municipal Residential Drinking-Water System are operated by different Operating Authorities;

“Surveillance Audit” means a partial audit of the PLAN and/or DO requirements of the DWQMS; and

“Systems Audit” means a process by an Auditor to verify that an Operating Authority’s documented QMS meets the PLAN requirements of the DWQMS;

1. Overview

1.1. Pre-Accreditation Requirements

Each Operating Authority shall establish a QMS that meets the PLAN and/or DO requirements of the DWQMS elements specified in the Director’s Direction for the Operational Plan Submission Option chosen by the Owner for the Subject System.

1.2. Accreditation Process Summary

The accreditation process shall consist of the following main steps:

1.2.1. The Operating Authority shall develop an Operational Plan in consultation with the Owner and shall submit the completed Operational Plan to the Owner for endorsement.

1.2.2. The Owner shall submit a copy of the Operational Plan endorsed by the Owner to the MOE on or before the date prescribed in the Prescribed Dates Regulation for the Owner and shall notify the Operating Authority of the Operational Plan submission to MOE.

1.2.3. Within one week of being notified by the Owner of the Operational Plan submission to MOE, the Operating Authority shall apply to the Accreditation Body to request accreditation services.

1.2.4. The Accreditation Body shall provide the Operating Authority with an application package and shall assign an auditor to the Operating Authority. If the assignment raises problems with conflict of interest or other business issues, the Accreditation Body shall discuss the assignment of alternative auditors with the Operating Authority before making a final assignment.

1.2.5. The Operating Authority shall submit a documentation package, including the application package, to the Accreditation Body for review.

1.2.6. The Accreditation Body shall conduct a Documentation Review to ensure that the documentation package is complete.

1.2.7. If the documentation package is not complete, the Accreditation Body shall notify the Operating Authority of the necessary corrective action(s) for the Documentation Review to continue.

ACCREDITATION (LIMITED SCOPE)

Accreditation Process for Operational Plan Submission Option 1: Partial DWQMS – Systems Audit and On-Site Verification Audit

1.2.8. The Auditor shall conduct a Systems Audit to ensure that the Operational Plan and documented procedures of the Operating Authority meet the PLAN requirements of elements 1 to 8 and 19 to 21 of the DWQMS.

1.2.9. If the Systems Audit is successful, the Auditor shall conduct an On-Site Verification Audit of the PLAN and DO requirements of elements 1 to 8 and 19 to 21 of the DWQMS to confirm that the QMS of the Operating Authority is being implemented according to the Operational Plan and its documented procedures, and the requirements of the Director's Direction. If the Systems Audit is not successful, the Auditor shall notify the Operating Authority of the necessary corrective action(s) for the Systems Audit to continue.

1.2.10. If the On-Site Verification Audit is successful, the Auditor shall forward the results of the audit to the Accreditation Body along with a recommendation for accreditation. The Accreditation Body shall review the results and the Auditor's recommendation and if in agreement, the Accreditation Body shall accredit the Operating Authority and provide:

(a) the Operating Authority with a copy of the audit results, the audit report and a Certificate of Accreditation (Limited Scope),
(b) the MOE with the identification of the accredited Operating Authority, the scope of its accreditation, copies of the audit reports and the results of the audits,
(c) the Owner with copies of the audit reports and the results of the audits.

Note: The Certificate of Accreditation (Limited Scope) will be issued

on condition that the Operating Authority submit an application for Accreditation (Full Scope) to the Accreditation Body within twelve (12) months of the date of issuance of the Certificate of Accreditation (Limited Scope).

1.2.11. If the On-Site Verification Audit is not successful, the Auditor shall notify the Operating Authority of the necessary corrective action(s) for the On-Site Verification Audit to continue.

Accreditation Process for Operational Plan Submission Option 2: Full DWQMS – Systems Audit Only

1.2.12. The Auditor shall conduct a Systems Audit to ensure that the Operational Plan and documented procedures of the Operating Authority meet the PLAN requirements of elements 1 to 21 of the DWQMS.

1.2.13. If the Systems Audit is successful, the Auditor shall forward the results of the audit to the Accreditation Body along with a recommendation for accreditation. The Accreditation Body shall review the results and the Auditor's recommendation and if in agreement, the Accreditation Body shall accredit the Operating Authority and provide:

(a) the Operating Authority with a copy of the audit results and a Certificate of Accreditation (Limited Scope),
(b) the MOE with the identification of the accredited Operating Authority, the scope of its accreditation, copies of the audit report and the results of the audit,
(c) the Owner with copies of the audit reports and the results of the audits.

Note: The Certificate of Accreditation (Limited Scope) will be issued on condition that the Operating Authority submit an application for Accreditation (Full Scope) to the Accreditation Body within twelve (12) months of the date of issuance of the Certificate of Accreditation (Limited Scope).

1.2.14. If the Systems Audit is not successful, the Auditor shall notify the Operating Authority of the necessary corrective action(s) for the Systems Audit to continue.

ACCREDITATION (FULL SCOPE)

Accreditation Process for Operational Plan Submission Option 3: Full DWQMS – Systems Audit and On-Site Verification Audit

1.2.15. The Auditor shall conduct a Systems Audit to ensure that the

Operational Plan and documented procedures of the Operating Authority meet the PLAN requirements of elements 1 to 21 of the DWQMS.

1.2.16. If the Systems Audit is successful, the Auditor shall conduct an On-Site Verification Audit of the PLAN and DO requirements of elements 1 to 21 of the DWQMS to confirm that the Quality Management System of the Operating Authority is being implemented according to the Operational Plan and its documented procedures, and the requirements of the Director's Direction. If the Systems Audit is not successful, the Auditor shall notify the Operating Authority of the necessary corrective action(s) for the Systems Audit to continue.

1.2.17. If the On-Site Verification Audit is successful, the Auditor shall forward the results of the audit to the Accreditation Body along with a recommendation for accreditation. The Accreditation Body shall review the results and the Auditor's recommendation and if in agreement, the Accreditation Body shall accredit the Operating Authority and provide:

(a) the Operating Authority with a copy of the audit results and a Certificate of Accreditation (Full Scope),
(b) the MOE with the identification of the accredited Operating Authority, the scope of its accreditation, copies of the audit reports and the results of the audits,
(c) the Owner with copies of the audit reports and the results of the audits.

1.2.18. If the On-Site Verification Audit is not successful, the Auditor shall notify the Operating Authority of the necessary corrective action(s) for the On-Site Verification Audit to continue.

2. Assignment of Auditors

In assigning auditors to do QMS audits, the Accreditation Body shall:

(a) not assign auditors with known conflicts of interest;
(b) match, to the extent possible, audit expertise with the size, type and complexity of the QMS being audited; and
(c) minimize auditor travel costs to the greatest extent possible.

3. Documentation Review

Operating Authorities should submit to the Accreditation Body thorough, accurate and complete documentation to provide sufficient evidence of their QMS. By submitting the documentation package, the Operating Authority is indicating that its QMS is ready for review.

The Accreditation Body will verify that the Operating Authority has developed and provided all of the necessary documentation for the accreditation process to proceed. If the documentation package is found to require further information or corrective action, then the components that are not complete will be returned to the Operating Authority with a covering letter explaining the areas requiring amendment.

When the documentation package is found to be complete, the Accreditation Body will notify the Operating Authority that the Systems Audit can begin.

4. Systems Audit

4.1. The Auditor will hold an opening meeting or teleconference with the Operating Authority to explain the scope and objectives of the audit.

4.2. The Auditor will ask the Operating Authority to provide a contact person to answer questions on the QMS.

4.3. The Auditor will verify that the Operating Authority's documented QMS meets the PLAN requirements of the DWQMS.

4.4. If the Auditor finds that the actions taken to address DWQMS requirements are incomplete or require modification, the Auditor will note the deficiencies and will communicate the information to the Operating Authority for follow-up and corrective action.

4.5. If the Auditor determines that the deficiencies negatively impact the integrity of the QMS system, corrective actions must be implemented and a second Systems Audit must be conducted.

4.6. At the conclusion of the Systems Audit, the Auditor will hold a closing meeting or teleconference with the Operating Authority and will provide the Operating Authority with a Systems Audit Report.

4.7. During the closing meeting or teleconference, the Operating Authority will have the opportunity to respond to the non-conformities identified in the Systems Audit Report. Where information provided by the Operating Authority impacts on the auditor's findings, the Auditor will amend the Systems Audit Report.

4.8. The Auditor will require corrective actions for major non-conformities, minor non-conformities and audit observations. Major and minor non-conformities will need a formal response from the Operating Authority to the Accreditation Body, usually within 30 days.

4.9. The Accreditation Body will close the Systems Audit once the Operating Authority has completed all amendments and prescribed corrective actions and the Operating Authority's documented QMS meets the PLAN requirements of the elements of the DWQMS.

4.10. The Accreditation Body will retain copies of all relevant documentation for future reference and will forward a copy of the latest version of the Operating Authority's Operational Plan if changes have been made pursuant to the Documentation Review and Systems Audit, to the MOE along with a recommendation that the MOE accept the plan as written.

5. On-site Verification Audit

5.1. The Auditor will hold an opening meeting with the Operating Authority to explain the scope and objectives of the audit.

5.2. The Auditor will ask the Operating Authority to provide a person to accompany the auditor during the On-Site Verification Audit.

5.3. The Auditor will verify that the Operating Authority's QMS meets the PLAN and DO requirements of the DWQMS elements specified in the Director's Direction for the Operational Plan Submission Option chosen by the Owner for the Subject System.

5.4. The Auditor's findings will be classified as an audit observation, minor non-conformity or major non-conformity. In the event that corrective actions are required, this information will be communicated to the Operating Authority at the closing meeting.

5.5. At the conclusion of the On-Site Verification Audit, a closing meeting will be held and the Operating Authority will be provided with an On-Site Verification Audit Report.

5.6. During the closing meeting, the Operating Authority will have the opportunity to respond to the findings identified in the On-Site Verification Audit Report. Where information provided by the Operating Authority impacts on the auditor's findings, the On-Site Verification Audit Report will be amended before the report is finalized.

5.7. The Operating Authority will be required to take action to correct, revise or amend the QMS to address the findings identified in the On-Site Verification Audit Report. Major and minor non-conformities will need a formal response, usually within 30 days.

5.8. The Operating Authority is responsible for providing the Auditor with evidence

that the required corrective actions have been completed. When a follow-up audit is being conducted to verify the correction of previously identified areas of concern, it may be sufficient to examine only those points, which have been found to require correction.

5.9. The On-Site Verification Audit will be closed once the Operating Authority has completed all amendments or the Operating Authority has prepared a suitably effective corrective action plan for any identified non-conformity.

6. Report by Auditor of Violations

6.1. In accordance with Section 26 of the *SDWA*, if an auditor, in the course of an audit, becomes aware of a violation of the Act, its regulations, a drinking-water works permit, a municipal drinking-water licence, an approval or order under the Act, the auditor shall report the violation to the Director, as soon as practicable, and shall include a summary of his or her observations in relation to the violation in his or her report.

7. Notification of Audit Results

7.1. The Operating Authority will be notified in writing, by the Accreditation Body, of the audit results. No accreditation will be granted until all Corrective Action Plans have been accepted and all corrective actions for major non-conformities have been completed and accepted by the Accreditation Body. Following a successful audit, the Operating Authority will receive a Certificate of Accreditation. The Accreditation Body will provide written notification to MOE of accredited Operating Authorities and Operating Authorities that are at risk of losing their accreditation.

7.2. Accreditation may be suspended or withdrawn by the Accreditation Body, in consultation with the Management Committee, if the corrective actions for non-conformities identified during the On-Site Verification Audits are not completed as scheduled. The Operating Authority may appeal any decisions concerning the withdrawal of accreditation to the Accreditation Body and the Management Committee.

8. Audit Reports and Results

8.1. Within 45 calendar days of an audit or within the time period specified by the Director and in a form and format mutually agreed upon by the Accreditation Body and MOE, the Accreditation Body shall forward copies of every audit report, the results of the audit, and the results of any reconsiderations of the audit to the Director, and the Owner and Operating Authority of the system.

8.2. The Accreditation Body shall also make public the results of any audit required by the Accreditation Body, in a form and manner specified by the Director.

9. Ongoing Documentation and Modifications to an Operating Authority's QMS

9.1. Changes to the Operating Authority's QMS must undergo a Documentation Review, Systems Audit and On-Site Verification Audit in order to be considered part of the Operating Authority's accreditation. All changes to the Operating Authority's QMS must be documented for review during the next audit. These changes cannot be considered part of the Operating Authority's accreditation until they have been reviewed by the Auditor. If the Operating Authority chooses to have the changes reviewed and audited prior to the Operating Authority's next regularly scheduled audit, the Operating Authority must contact the Accreditation Body to make the necessary arrangements.

9.2. An Operating Authority must notify the Accreditation Body of any change to its QMS that would warrant an immediate re-audit. The Accreditation Body shall, as a requirement for the maintenance of accreditation, require that this notification be provided. Failure to notify the Accreditation Body may result in the Operating Authority losing its accreditation.

10. Audit Cycle

10.1. Following the issuance of a Certificate of Accreditation (Full Scope), the Accreditation Body shall ensure that audits are conducted according to the following three year cycle:

i. Year 1 – Surveillance Audit
ii. Year 2 – Surveillance Audit
iii. Year 3 – Accreditation Audit

10.2. Operating Authorities must pass their QMS audits in order to maintain accreditation.

11. Granting of Accreditation

11.1. In accordance with subsection 24(1) paragraph 5 of the *SDWA*, the Accreditation Body shall:

(a) grant accreditation to an Operating Authority of a Subject System upon a review and acceptance of the written recommendations of the auditor in accordance with any relevant ISO/IEC standards and guidelines as amended from time to time; and
(b) provide the accredited Operating Authority with a Certificate of Accreditation.

12. Suspension or Revocation of Accreditation

12.1. In accordance with subsection 24(1) paragraph 5 of the *SDWA*, the Accreditation Body shall:

(a) suspend or revoke the accreditation of an Operating Authority of a Subject System upon a review and acceptance of the written recommendations of the auditor in accordance with any relevant ISO/IEC standards and guidelines as amended from time to time.

12.2. In accordance with section 24(5) of the *SDWA* regarding any proposed suspension or revocation of the accreditation of an Operating Authority, the Accreditation Body shall notify in writing:
(a) the MOE Project Representative;
(b) the Management Committee;
(c) the Director*;*
(d) the Operating Authority; and
(e) the Owner of the Subject System.

12.3. The Accreditation Body will indicate the reasons for the recommended action in any notice of proposed suspension or revocation of accreditation.

13. Documentation and Data Reference File

13.1. The Accreditation Body shall maintain a documentation and data reference file on all activities undertaken with respect to the granting of the accreditation of Operating Authorities and the suspension or revocation of accreditation of Operating Authorities, which can be audited by MOE from time to time.

14. Listing of Accredited Operating Authorities on the Accreditation Body's Website

14.1. The Accreditation Body shall maintain:
(a) a database that contains the names of all accredited Operating Authorities and the scope of their accreditation, which shall be accessible to the pubic using the Accreditation Body's website; and
(b) historical information for Operating Authorities whose accreditation has been suspended or revoked. The suspension and revocation history of a specific Operating Authority will be made available upon written request to the Accreditation Body.