TOWARDS A PROCEDURE FOR DEALING WITH SEWAGE POLLUTION INCIDENTS ON BEACHES

SOLENT FORUM

Local Government Association

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SOLENT FORUM

This guide was written by Tracey Hewett, Solent Forum Officer and published by the LGA Coastal Special Interest Group.

The Solent Forum was established in 1992 to consider and provide advice on strategic issues – that is, issues which have implications for a wide area – as well as to develop a greater understanding among the authorities and agencies involved in the planning and management of the Solent, and to assist and influence them in carrying out their functions.

Since January 2002, the Solent Forum has provided administration and secretariat duties to the Solent Water Quality Association that has focused on the implications of the proposed revisions to the Bathing Water Directive for local coastal authorities.

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INTRODUCTION

Recreational bathing waters can be polluted by sewage and industrial discharges, combined sewer overflows (CSO), diffuse source pollution from agricultural areas and urban runoff. The EC Bathing Water Directive (76/160/EEC) is the current statutory instrument governing bathing water quality in the United Kingdom. It requires member states to meet quality standards at bathing waters laid down in the Directive. The purpose of the quality standards is to reduce the risks of illnesses, such as gastroenteritis, ear and respiratory tract infections, hepatitis A, and acute febrile respiratory illness, arising from accidental ingestion of contaminated water or its contact with the body.

The public expect to swim in bathing water with minimum health risks and to be told of any increased risk or change in circumstances. However, various incidents and studies have shown that we are not currently sufficiently prepared to respond to water quality incidents to ensure that the public are both protected from and informed of increased risks.

For example, during the summer of 2002, a sewage pollution incident occurred at a beach in the Solent, out of office hours. Although, this was not a designated bathing water, it is a popular beach with locals and visitors. Unfortunately, the coastal local authority had no procedure in place to immediately respond to the situation and inform the public of the change in water quality or the increased risks. More recently, after the 2004 bathing season, Surfers Against Sewage contacted all local coastal authorities who had suffered failures at beaches during the season to find out what notices had been used to protect bathers from the risks associated with non-compliant waters. Worryingly, the results showed that 67% did not inform the public of decreased water quality and the associated health risks.

As is common with many emergency procedures, those response plans that are now in place were drafted after an event to ensure future preparedness. Issues of public liability and the duties imposed in the revisions to the Bathing Water Directive mean that we can not wait for further incidents of ill-health or in some cases fatalities before we take action.

STEPS TO A PROCEDURE

This document outlines how to agree a procedure for responding to a non-compliant bathing water incident at a local beach. It does not give the actions required but serves as a reference document to ensure preparedness. It is based on a workshop that the Solent Forum ran in 2003 to agree an integrated response that would inform local authority in-house procedures and contains details of the sewage management plan from Teignbridge District Council, Devon that was drafted in response to an incident in 1999 (Annex E).

Ownership of the plan is a critical factor in any response; consider President Dwight D Eisenhower's key principle: **"The plan is nothing. Planning is everything"**. This makes the point that, for plans to be of value, they must be enabling records supportive of and derived from "the planning process". To this end this document includes details on how to run a workshop that will elicit information and gain consensus.

It is important to recognise that developing a procedure is more than just writing down what action a particular organisation will take. It is a dynamic process that includes ensuring that those actions are compatible with those of other organisations, that the response meets the needs of the situation and that it can be activated by competent staff. The process will take time and necessitate the involvement of representatives from both internal and external organisations, and it is therefore important that sufficient resources are given to the process. As some of the agencies and organisations such as the Environment Agency and water companies will be common to all such plans, it is worth considering running a regional or county event to save the resources and staff time of those concerned to agree an overall procedure that can be adapted to local circumstances.

Annex (found on CD)

A. Plan Framework
B. Programme
C. Example of scenario
D. Questions to ask
E. Example from local district

Step 1. Getting Started

Finding the right people

Although the production of the procedure is a cooperative venture, it is most effective to nominate one person to lead. They will collate the procedure inputs, produce the plan outputs and organise validation and review. It is probably most appropriate for the beach operator to lead as they are likely to be the key player in ensuring a procedure is in place, and in most cases this will be a local authority.

Organise a working group

The designated coordinator should not produce the output in isolation. A working group should be formed to gather information and advise on technical details. They will also act as a sounding board during the process and provide preliminary comments on drafts. Those who will activate or implement the plan should be represented such as the beach operator, and those with related statutory duties such as the water company and Environment Agency. The working party may not need to meet round the table very often once the parameters and work programme have been established.

Set the parameters

The initial tasks of the working group are related to agreeing the parameters of the procedure. They will need to consider:

- what the procedure is expected to achieve;
- the template/framework;
- does anything exist for this function already, if yes can it be revised or does a new plan need to be produced?
- does experience of this incident response already exist locally but has not been formally written down?
- in what circumstances and by whom will it come into operation?
- what expectations do the customers of the response have (public, external organisations)?
- work programme and timeframe for production.

Step 2. What to include

This section sets out the basic elements which make up the response. A plan framework which is consistent with this chapter is at Annex A on the CD. The main content relates to the roles and responsibilities of identified agents. The workshop described in section 3 is a way to agree such responsibilities and to raise awareness of each other's roles. The written procedure should include the following:

2.1 Introduction

It is important that the introduction leaves readers and users of the plan in no doubt about its scope, so as to avoid incorrect expectations of it. The introduction should give a general overview of the procedure, explain why it is needed and its objectives. It should identify the type of incident the plan will address and define the criteria for activating the response.

Levels of control

Through the planning process, levels of control will be identified. For example there may be a response for a minor incident (wet-weather failure) and for a major incident (large pollution incident). These should be explained in the introductory section.

Details of the agreed response procedure

This should cover the initial response (verification), recovery response (notification and mobilisation of resources) and return to normality (delivering the all clear). It should also detail how information is cascaded, the key members of the response team and actions required. Finally it should detail who gives the all clear and stand down. It is useful to provide this in a diagram.

2.2 Emergency Contacts List

This should include phone/pager numbers, radio details and addresses as required. It should cover the main first responders, their roles and a brief description of what they should be notified of and any deputies or alternative alerting arrangements in the event of the first choice being unavailable. This list is what the initial contact will use to initiate the response, so it is very important that it is kept up-to-date.

2.3 Roles and Responsibilities

It is important that the responsibilities of all organisations are clearly set out so that there is no danger of misunderstandings, overlaps, duplication or gaps. It is wise to describe responsibilities in terms of positions, posts or appointments rather than using individuals' names. This limits to some extent the number of times the plan has to be revised to take account of personnel changes. It also emphasises that the responsibility rests on the post, not the individual.
Setting out responsibilities serves to give an unambiguous outline of individual post-holders' responsibilities. As well as giving these post-holders a clear view of their own responsibilities, it will enable other people, inside and outside the organisation, to identify with whom they need to liaise.

2.4 Equipment

Through the making of the procedure, it will become apparent what specific equipment is needed to respond to the incident. Any such equipment should be noted.

2.5 Distribution List

Record keeping is an important element of procedures and their use. A list should be kept of all recipients for review and update.

2.6 Validate and Review

This section sets out how the plan is to be validated and reviewed. Consider how best the plan can be validated to ensure that it is capable of being implemented and would be effective in meeting its objectives. It is normal to review on a regular basis but the timescale will vary for different sections and appendices, e.g. contact lists have to be reviewed much more frequently than long-term response activities. Reviews should always be carried out after incidents, exercises and where there have been changes to organisational structure, communication arrangements or resources available.

2.7 Additional Information

Additional information relating to such incidents that may be useful should be added here. Factors that might be included are insurance and legal considerations including preservation of records, and media policy. This should be prepared in consultation with the necessary advisors.

Step 3. Workshop

The Solent Forum has found that the best way to agree roles and responsibilities is by running a workshop event. Workshops combine training, development, team-building, communication, motivation and planning. Participation and involvement increases the sense of ownership and empowerment, and a workshop environment is particularly useful in the creation of plans, processes and actions. Workshops encourage buy-in and involvement because they are necessarily participative, and the content and output are created by the delegates. The Solent Forum ran such an event for all local authorities in association with the Environment Agency, Southern Water and the Health Protection Agency to determine roles and responsibilities that were used to inform in-house procedures. However, the workshop tools (scenario and questions) could be used at a local district level as long as all those likely to have a role to play are party to such a meeting.

The suggested programme for a regional or sub-regional event is found in Annex B. It consists of three parts: an introduction to the procedure and background information about the Bathing Water Directive; a workshop session using a worst case scenario (example found in Annex C) as the basis for formulating a response and helping the workshop participants to determine actions through key questions found in Annex D; and a facilitator-led consensus session to agree roles and responsibilities. There were 40 participants at the Solent Forum workshop and they were split into groups with one representative from each agency or organisation in each group where available. Where only one representative from a particular organisation was present they roamed around the groups providing input. The rest of this section provides local authorities with the timeframe for running such a participatory workshop.

3 months before

- Determine plan coordinator/lead
- Establish working party and hold a meeting to discuss formation of a procedure
- Decide whether it should be a regional workshop or local meeting with key stakeholders
- Review possible dates for event
- Price up venue, if applicable, select suitable venue and arrange AV equipment
- Agree programme for event (Annex B) and contact potential speakers
- Book trained facilitator.
- Identify those who should input to the procedure and invite to event/meeting (a booking form assists in planning arrangements for large events). Invitees should be beach operators, Environment Agency responders, water company officers, press officers, local authority representatives from environmental health, leisure and tourism, recreation, English Nature, coastal landowners with public access to beaches and the Health Protection Agency.

2 months before

- Working party to agree the “worst case” scenario for use at the workshop
- Confirm places at event together with programme and venue details.
- Chase outstanding attendees for representativeness; the greater the number of participants the higher the input and ownership of the outline procedure.

- Meet with facilitator to agree format of feedback session.
- If not already done, finalise arrangements with speakers and provide brief.

1 week before

- Confirm venue and numbers for catering arrangements.
- Prepare delegate badges.
- Determine workshop groups ensuring a mixture of responders in each group. (It is helpful to put a coloured sticker on the delegate's badge).
- Prepare exercise pack for delegates containing worst case scenario and related questions (Annex C and D) and ensure sufficient flipcharts for each group for the feedback session.
- Ensure presentations are available for introduction session.
- Check with facilitator on any extra needs/aids.

On the day

- Ensure room is laid out for workshop
- Check AV equipment
- Provide delegates badges and packs at registration
- After final session ensure plan coordinator notes agreed actions in order to work up the definitive roles and responsibilities.

Step 4. Putting it all together

When the roles and responsibilities have been agreed and all additional information for the procedure document has been gathered a master document containing the elements outlined in Section 2 needs to be prepared which is accessible and easy to refer to.

Plan writing and the subsequent consultation can produce a lot of paper, it is most efficient to produce the plan as an electronic document. However, strict document control is needed to prevent confusion over amended drafts.

Step 5. Consultation

Once a plan document is more-or-less complete, it needs to be circulated to the working party as statutory agents and also to those who were unable to attend the workshop/meeting. The contents of a plan should not come as a complete surprise to any recipient: they should already have been involved in discussions during the information gathering and plan writing processes. However, it is not until the plan is put together that people can fully see how it is intended to work as a whole, and where they fit in.

A reasonable period should be allowed for replies (give a longer consultation period over holiday time). Consultation with regular contacts, for example within the Working Group can be carried out on a mutually acceptable timetable. Most recipients will be content to make comments on paper but it may be productive to hold meetings with any individuals or organisations with a substantial input to the plan or particular difficulties with it. On issues involving key aspects of the plan, agreement should always be reached on a way forward which is acceptable to everyone.

If changes are made to the draft following consultation, a revised draft should be circulated and everyone asked to approve it. It is best at this stage to operate a positive reply policy (as opposed to "if we don't hear from you we will assume that you are content") to ensure that everyone has seen and considered the draft. It may be necessary to go through this ‘consult-redraft-consult’ cycle more than once tp ensure everyone is happy with the plan.

It is helpful to issue a final draft as a hard copy to all identified stakeholders, even if consultation is done electronically.

Step 6. Taking it all apart

Once a master document has been produced for a plan, thought needs to be given to how the actions and activities required by it can be cascaded down into the working and management practices of the organisations involved.

Where the master plan states that a particular organisation will carry out a task or provide a service, that group will need a specific procedure to show how they will do so. This will then need to be cascaded down into job descriptions for individuals. Some of the sections in the master document will, themselves, be subsidiary plans, for example, the communications procedure.

Some organisations have found it useful to provide staff with small checklists, summaries of plans and/or contact lists which will guide them through the response. These are based on, or extracted from, the main plan document and they help to ensure that nothing or no-one critical is missed.

Step 7. Validate and Review

No matter how much information has been gathered and consultation carried out, no matter how comprehensive and brightly coloured the plan document, the plan is not complete until it has been validated – demonstrated to be effective in meeting its objectives. There are various activities which contribute to the validation of a plan, and a validation strategy should contain elements of all of them:

- Consultation and discussion;
- Exercises and exercise debriefs;
- Checking the continued validity of the plan after incidents.

CONCLUSION

The preparation of a procedure can seem like a daunting process at the outset, especially if there is no existing plan to use as a model. However, it is better to have some plan than none at all. Many plans do not need to be large or sophisticated. Some may only be a few pages long. This Guide has had to cover many aspects and so can appear more complicated than it really is. The important thing is to get started – do the research and put something down on paper. Plans can be refined, expanded and improved over time through the training and validation processes.

Never forget that a plan document is not an end in itself. What is important is the planning process.

So – start planning!