

Response ID ANON-DBEN-QFVK-H

Submitted to Scottish roadworks technical consultation 2022

Submitted on 2022-09-08 10:16:16

Qualifications

1a How many qualified operatives should be required per site?

One (status quo)

Please provide context or further detail for your answer:

Scottish Water supports the current requirements for the number of operatives at each site.

This decision should be made by utilities based on their specific requirements.

How utilities manage the training and qualification of Operatives will be demonstrated in Reinstatement Quality Plans.

The latest data from the Scottish Road Works Register shows that the average pass rate for inspections across all utilities in Scotland is above the 90% target. The Street Works Qualifications demonstrates that an individual has attended the appropriate training course. However, this does not itself demonstrate competence. In addition, experience is required prior to attending training and increasing the minimum number of qualified operatives on sites may limit opportunities for training and development.

Scottish Water complies with the current regulations and does aim to ensure that all staff working on road works are appropriately qualified. However, operationally, there may be times when there is one qualified operative in a team. For example, Scottish Water's Water Response squads are typically two person teams. A move from the status quo would result in new operatives, modern apprentices etc being unable to work on these teams to get the necessary experience.

1b How many qualified supervisors should be required per site?

One (status quo)

Please provide context or further detail for your answer:

Scottish Water supports the status quo of one supervisor per site. The current system works well without amending these requirements, evidenced by the strong performance data of utilities.

The current regulations require works to be supervised by a qualified supervisor but not that they are always on site when works are in progress. It is standard practice for supervisors to move between multiple sites depending on operational requirements.

Scottish Water believes that the introduction of a requirement for a specific number of supervisors to be continuously present on each site when works are in progress would place a significant burden on the workforce and may undermine the sector's ability to deliver vital works across Scotland.

Multiple supervisors may also result in lack of clarity regarding site instructions, for example.

2 Should there be any other class of card holder for roadworks generally or are the current categories of supervisor and operative sufficient?

Yes (more classes of card holder required)

Please explain your answer:

Scottish Water notes that the current system does not provide specific training on the assessment/inspection of SLG or reinstatements and their compliance with the Safety Code or the SROR. This results in inconsistencies in the recording of inspections.

Scottish Water believes the creation of additional qualifications or modules within the current qualification framework for inspection of works in progress and completed reinstatements could be explored. This would ensure a baseline of consistency in inspections for Roads Authorities and allow utilities to operate on a shared understanding when managing sites and assessing works.

We also believe there is some potential in investigating the requirement for an inspectors' qualification to achieve some consistency in how SLG and reinstatements are assessed against the relevant specifications; and to be able to adequately and accurately describe any failures that may be identified.

3a For a maximum of how many sites should a supervisor be concurrently responsible?

Unlimited (status quo)

Please explain your answer:

Scottish Water supports the idea that this should be based on the needs and operating model of specific businesses and the type of works the supervisor is responsible for.

No issues have been raised or evidence presented that there is an issue and current data from the SRWR demonstrates that utilities are generally

performing well. What is not clear is the performance of roads authorities or third parties working on roads.

Scottish Water is of the view that the role of a supervisor is to ensure a consistent quality across a range of sites, and to support operatives to embed quality and safety in their work. As such, supervisors do not need to maintain a constant presence at a site, and they can deploy their skills more effectively to drive quality outcomes by moving between a range of sites.

3b How often should a site supervisor attend site to undertake direct supervision?

As the site requires (no prescribed amount, status quo)

Please explain your answer:

Scottish Water believes this should be dependent on the type and scale of works being carried out.

Adequate risk assessments should be undertaken in advance of, or during, works to identify requirements for supervisors to attend sites, including operatives escalating any noted issues in compliance with their organisation's policies and procedures.

We are of the view that introducing a requirement for supervisors to visit sites may be impractical in many cases, such as small-scale works that would normally be completed in a short period of time where standard operating procedures and safe systems of work are being followed.

Introducing an arbitrary requirement for supervisors to attend sites on specified basis would also increase the sector's environmental footprint, requiring vehicle journeys to be made to sites unnecessarily.

Supervisors will also make use of technological advancements such as video calling, to communicate with operatives and provide real-time guidance where necessary and appropriate. This ability does not replace site visits. However, it has proved a helpful additional tool for many utility companies, improving the efficiency and quality of their work.

Reinstatement Quality Plans

4a Would you say these timescales are reasonable for this task, submitting a Reinstatement Quality Plan?

Yes

Could you please comment on the proposed timescales above?:

From April 2023, all utilities currently operating in Scotland will be required to submit their first plans. Additional requirements for the submission of first plans will only be applicable to newly operating utilities. A timeframe for submitting a first plan is reasonable. However, Scottish Water believes this should be set at 90 days instead of 60 days, to ensure new utilities have a full quarter to develop their first plans. This suggested timescale is in line with other reporting metrics currently in place.

Where serious failings are identified under an existing plan, Scottish Water agrees with the principle that utilities should be required to submit changes to agreed plans. However, a requirement to make changes within 30 days would not give utilities sufficient time to fully investigate issues and make robust changes to plans, ensuring an effective resolution. This could result in interim solutions when better solutions could be arrived at given sufficient time. Whilst immediate safety issues should be addressed, a timeframe should be agreed for the investigation and implementation of changes that may be required to practices.

In line with new requirements introduced by the Scottish Government for compliance with the Scottish Road Works Commissioner further clarification is needed, setting out how the timings proposed in this consultation would relate to the full process of commissioner compliance. Information is required to understand how compliance investigations will be carried out and related timescales agreed.

About you

What is your name?

Name:

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What is your email address?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Scottish Water

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: