

## REPORT ON NQMS SCHEME AUDIT 2021

### Introduction

This first audit of the NQMS Scheme was carried out in October and November 2021. As intended, it was confined to the process whereby an SQP implements the requirements of the NQMS, ie the documentary evidence specifically relating to that process. It did not look at any other aspects of projects or sites.



As previously agreed by the NQMS Steering Group, 5% of submitted declarations were audited which resulted in six declarations being selected. Three members of the SiLC PTP volunteered to carry out the audits and therefore each auditor carried out two audits. The agreed procedure was that the auditors communicated with the respective SQPs to obtain the necessary information and therefore were aware of the SQP identity and the project/site name. Apart from the auditor for a specific audit and the audit co-ordinator, the identity of the SQP and the project/site which relates to each one of the audit results sheets remains confidential. All six of the SQPs relating to the selected declarations are currently active.

The declarations to be audited were selected on a random basis from the total number of declarations submitted in the two years prior to the audit. As some SQPs have submitted considerably more declarations than others, this inevitably resulted in those who had submitted the greater number of declarations being more likely to be chosen for audit. This may have produced a bias in the results whereby this audit possibly does not fully reflect the extent to which overall the NQMS requirements are being adhered to. In hindsight, the method of choosing declarations for audit should therefore be reviewed.

When requested, three of the SQPs responded within the required time frame but the other three did not quite meet this requirement. In one case, this was due to awaiting client agreement, because the project details were not yet in the public domain. In general, there were no real difficulties in obtaining the required information and the SQPs responded well.

### Results

The audited declarations covered desk study (1), interpretative (2) and combined factual and interpretative (3) with two of the combined factual and interpretative reports including a risk assessment. The five aspects that the auditors addressed are discussed below;

- Project team assessment: this was marked as 'Conformant - good' for all six declarations.
- Checking and signing-off of key aspects: this was marked as 'Conformant - good' for five of the declarations. The sixth declaration was marked as 'Conformant - improvement possible'. This is because no completed report reviewing form or template was provided. A subsequent email from the SQP stated that report reviewing is done on the company server which could not be released.
- Understanding of regime and objectives: this was marked as 'Conformant – good' for all six declarations.
- Documented response to Appendix 1: this was marked as 'Conformant – good' for three of the declarations. One of the others was marked as 'Conformant - improvement possible' as the SQP had just signed the bottom of the relevant sections of Appendix 1, but a more detailed response would have been better. Another was also marked as 'Conformant - improvement possible', in this case because the SQP stated that compliance with Appendix 1 is documented

in the report but specific documentation relating to Appendix 1 was not found in the report. The remaining declaration was marked as 'Non-conformant - minor'. The auditor noted that although a review checklist in respect of Appendix 1 was provided, this was completed retrospectively in response to the audit request rather than at the time of the declaration being made.

- Compliance of conclusions or recommendations with NQMS requirements: marked as 'Conformant - good' for four of the declarations. One of the others was marked as 'Conformant - improvement possible' and the auditor noted that although limitations are referenced in several sections of the report, there is no specific section in the report that considers limitations with recommended next steps. The remaining declaration was marked as 'Non-conformant - minor' because no limitations were identified within the report, although the auditor noted that the site in question is of limited complexity. This one was a desk study.

Three of the declarations were marked overall as 'Conformant - good', two were marked as 'Conformant - improvement possible' and one was marked as 'Non-conformant - minor'.

### **Recommendations**

1. The selection of declarations for audit should be a two-stage process covering declarations submitted in the two years prior to the audit taking place. First, the SQPs should be selected randomly from the SQPs who have submitted declarations in this period. If there are duplications from this process, then random selection should continue until there are no duplicates and the number of SQPs chosen equals 5% of the number of declarations submitted. The second stage would be to randomly select a declaration for each of the selected SQPs.
2. A signed and dated report reviewing form or template should be a specific requirement of the NQMS and in a format that can be made available in the event of audit. It should cover all of the stages of producing a report (draft and each stage of review including by individual disciplines such as geologist, hydrogeologist, risk assessor, etc if applicable), be signed and dated by author(s), reviewer(s) and approver(s) and also have sections for the implementation of review comments and final compilation. Existing company formats that meet these requirements would be fully acceptable.
3. Modify Appendix 1 to incorporate tick boxes against each one of the questions and also include provision for the completed form to be signed and dated. If possible, the form should be fully digital including use of digital signatures. The NQMS documentation should indicate that Appendix 1 is to be completed at the time the SQP prepares the declaration, although there will still be no requirement to submit Appendix 1 with the declaration. Instead, Appendix 1 should be kept with the rest of the project documentation and be available in the event of audit.

2 March 2022