

2013 EXTERNAL AUDIT BY SAFETY CODES COUNCIL**Introduction:**

On September 4-6, 2013 representatives from the provincial Safety Codes council conducted an external audit of Parkland County Safety Codes services (all disciplines – including Building, Electric, Plumbing, Gas and Private Sewage and Disposal Services) for the period January 1, 2012 to December 31, 2012. This external audit outlined twelve areas of concern for the auditors.

Facts (Background Information):

Parkland County Planning and Development Services delivers Safety Codes services through a combination of internal County staff (2 Building Inspectors for the Building Discipline), and an external private contract agency for the provision of all other Safety Code Disciplines (Electric, Plumbing, Gas, and Private Sewage and Disposal). Parkland County Council authorized consulting budget for 2015 for the preparation of a Safety Codes Business Plan for Parkland County. This Business Plan (and delivery options) will be considered – separately – by Council in mid-2015. However; the Consultant selected to prepare this Business Plan (Dan Six Investments Ltd – Lee Danchuk) is an experienced Safety Codes Manager and so Administration had Mr. Danchuk prepare the following detailed responses to the audits twelve areas of concern. Subsequent to this response the County received the attached April 23, 2015 letter from the Safety Codes Council confirming satisfaction with the County's audit response(s).

Analysis of Audit – Actions taken**Quality Management Plan**

- 1) *Issue:* The Audit showed that the Quality Management Plan does not include the portion; that 'Orders' are to be in accordance with legislation and the Safety Codes Council policy. The Quality Management Plan needs to be revised to include the Safety Codes Council policy requirements.

Action taken: A revised U.Q.M.P. has been prepared for Parkland County, including the requirement on 'Orders'. Once approved by Parkland County Council this revised U.Q.M.P. will be submitted to the Safety Codes Council.

- 2) *Issue:* The Municipality does not maintain a registry of Safety Code Officers and Permit Issuers who have been provided with a copy of Quality Management Plan and approved revisions.

Action taken: Parkland County has started a registry of Safety Code Officers and Permit Issuers who have been provided with a copy of Quality Management Plan and approved revisions.

Personnel

- 3) *Issue:* The Municipality does not maintain a registry of safety codes officers and permit issuers.

Action taken: Parkland County has started a binder with a section showing the credentials of all Safety Code Officers and Permit Issuers working for the Municipality and the Agency.

Quality Management Training

- 4) *Issue:* The Municipality does not maintain a record of employees' Quality Management Plan training.

Action taken: Parkland County has started a binder which includes a section outlining all Quality Management Plan training for all applicable staff.

Orders and Variances

- 5) *Issue:* The Audit showed that the 23 Variances issued in Parkland County for Private Sewage Systems had not been registered with the Safety Codes Council.

Action taken: Parkland County has checked with Superior Safety Codes Inc. (the contracted Agency) who advised that all P.S.D.S. variances were registered with Safety Codes Council and will look into the matter. In future Parkland County will ensure all variances issued are registered in accordance with the Safety Codes Act and Safety Codes Council policy.

Site Inspection Reports

- 6) *Issue:* When an inspection is requested, the inspection form shall become a part of the file. A Safety Code Officer will inspect in a timely fashion; within two working days is recommended however will not exceed five working days. Ensure there is a record to illustrate that timeframes for inspections are not exceeded.

Action taken: An inspection tracking system has been implemented showing time of request and inspection dates. This record will ensure timeframes for inspections are not exceeded. This system has been discussed with the Safety Codes council audit staff and is acceptable and will be made available to them at the next Safety Codes audit.

- 7) *Issue:* Some permits had received only one (1) site inspection when two (2) were required by the Uniform Quality Management Plan.

Action taken: In future, Parkland County will ensure that the required number of site inspections are performed prior to permit closure.

- 8) *Issue:* A full description of work in place at the time of inspections is required on site reports.

Action taken: In future, Parkland County will ensure that there is a full description of the 'work in place' at the time of all inspection.

9) *Issue:* Ensure that work is exposed for inspection by the Safety Code Officers.

Action taken: *In future, Parkland County will reinforce with applicants that projects must be exposed for inspection. This will also be assisted by the use of documented inspection requests.*

10) *Issue:* A Permit Services Report (PSR) is required to close all permit files. The PSR is to be issued within 30 days of completing compliance monitoring services.

Action taken: *In future, Parkland County will ensure that a PSR is issued to close all files no matter the reason for closure (i.e. compliant, cancelled etc.). The PSR will be issued within 30 days of completion of compliance monitoring as required by the U.Q.M.P.*

Verification of Compliance

11) *Issue:* The 'Verification of Compliance' process was found to be inconclusive. The review of the 'Verification of Compliance' process could not be verified as meeting the intent of the Safety Codes Act and Quality Management Plan.

Action taken: *In future Parkland County will ensure that the 'Verification of Compliance' process is documented and followed in accordance with the Safety Codes Act and Safety Codes Council policy. This will include: name and title of person providing the VOC, date accepted by S.C.O., and signature and designation # of S.C.O.*

Permit Time Extensions

12) *Issue:* A number of permits had not been granted a time extension and/or a final inspection had not been requested or conducted within 365 days of permit issuance.

Action taken: *In future, Parkland County will ensure that the provisions of section 25(2) of the Alberta Permit Regulation 204/2007 is met. Permit issuers and Safety Code Officers working for Parkland County may extend a permit for a fixed period of time that they feel is appropriate to complete the work. This is a 'one time' 90 day extension providing the request is made in writing and the request is made prior to the expiration of the permit.*

Options:

Council may accept both the 2013 External Safety Codes Audit from the Safety Codes Council as well as the 2014 Internal Safety Codes Audit Response by Parkland County as information.

Conclusion/Summary:

Administration is satisfied by the responses provided by the contractor and measures which have been implemented to address concerns identified through the external audit.

Author: D. Lee Danchuk, consultant
Author: Paul Hanlan, Manager

Department: Planning and Development

Date written: May 4, 2015



SAFETY CODES COUNCIL

#1000, 10665 Jasper Avenue N.W., Edmonton, Alberta, Canada, T5J 3S9
Tel: 780-413-0099 / 1-888-413-0099 • Fax: 780-424-5134 / 1-888-424-5134
www.safetycodes.ab.ca

July 23, 2014

Mr. Pat Vincent
QMP Manager
PARKLAND COUNTY
53109 A SH 779
Parkland County, AB T7Z 1R1



Dear Mr. Vincent:

RE: Safety Codes Audit of the Building, Electrical, Plumbing, and Gas disciplines for sample period of January 1, 2012 to December 31, 2012

As you are aware, the Safety Codes Council initiated an audit of Parkland County's safety codes administration of the Building, Electrical, Plumbing, and Gas disciplines on September 4-6, 2013. The audit has been completed and filed with the Safety Codes Council. An Executive Summary of the audit, along with a copy of the Audit, is included for your reference and use.

On behalf of the Safety Codes Council, I thank Parkland County and staff for their cooperation. Should you have any questions, please feel free to contact me.

Sincerely,

Gerald Baron, SCO, CTAJ
Director of Operations

Direct: 780.413.6043
Email: gbaron@safetycodes.ab.ca

GB/lj

Enclosures



1000, 10665 Jasper Avenue
Edmonton, AB T5J 3S9
(780) 413-0099

EXECUTIVE SUMMARY

July 2014

Parkland County (BEPG)

The Safety Codes Council in administering its responsibilities and duties under the *Safety Codes Act*, audits Alberta's safety codes system. These audits provide an objective and unbiased assessment of performance, effectiveness, and risk associated with Alberta's safety codes system. The audits are observations of the safety codes system and those providing services within it; measured against legislative requirements, policies and directives of the Safety Codes Council, and industry best practice.

The Safety Codes Council audit process takes into consideration the:

- overall management and commitment of accredited organizations;
- accreditation administration of services of the Quality Management Plan including permitting, inspections, and related financial administration of fees and levies;
- certification in respect to safety codes officer and permit issuer engagement and practices;
- Master Electricians program including Master Electrician activities; and
- general processes such as Orders, Variances, and other safety codes services.

This audit was conducted on September 4-6, 2013, focusing on the Parkland County's accreditation in the Building, Electrical, Plumbing, and Gas disciplines. Only those processes, practices, and activities related to the administration of these disciplines were considered. The audit took into consideration:

- the checklist review of the County's accreditation conducted by Alberta Municipal Affairs on July 7, 2011;
- 115 (17 of which were not provided) of the 3,084 closed safety codes permit files from the January 1, 2012 to December 31, 2012 sample period;
- 26 (21 of which were not provided) of the 823 open and over one year old safety codes permit files from the January 1, 2012 to December 31, 2012 sample period;
- 1 of the 1 Order in the Building discipline;
- 4 of the 23 Variances in the Building and Private Sewage Treatment System disciplines;
- processes of permit issuance, inspections, and enforcement follow-up; and
- the roles and responsibilities of safety codes officers, staff, and contracts related to providing services in these disciplines.

The audit found Parkland County, its staff, and contracted accredited agency to be providing services in the building, electrical, plumbing, and gas disciplines with integrity and reasonableness in meeting with the intent of the *Safety Codes Act* and the Parkland County's approved Uniform Quality Management Plan. However, the audit also identified that the Parkland County's safety codes services in these

disciplines could improve with the management and service delivery of Parkland County's Quality Management Plan expectations. It also identified that the Order and Variances reviewed under this audit did not comply with Safety Codes Council policy and the Safety Codes Act and Regulations. These are not critical concerns, but important.

Following is a summary of the recommendations from the audit:

1. Not all required files were provided for audit.
The Municipality's accreditation, through its Quality Management Plan, clearly identifies that the Municipality will be subjected to periodic reviews or audits and, that it is imperative, that the Municipality will provide full cooperation to these reviews/audits; failing which, the Municipality is subject to losing its accreditation. Full cooperation with auditors, including providing requested files and related documentation, is mandatory.
2. The Municipality is required to maintain Quality Management Plan training records applicable to their staff.
3. The Municipality must issue Orders in accordance with the *Safety Codes Act*. The Municipality must also ensure Orders it issues are issued and registered on the information system in accordance with the *Safety Codes Act* and Safety Codes Council policy.
4. The Municipality must ensure Variances are issued and registered on the information system; and used in accordance with the *Safety Codes Act* and Safety Codes Council policy.
5. *Permit Applications and Construction Document Review* – The Municipality is required to collect all information required by legislation and the Safety Codes Council as part of each permit application. The Municipality will issue permits that include the project value, permit conditions, issuer's name, signature, and designation number, and a *Freedom of Information and Protection of Privacy Act* statement that meets the requirements.
6. *Inspection Requests and Site Inspection Report Forms* – A safety codes officer is required to inspect within the timeframes noted in the discipline specific sections of the Quality Management Plan. A safety codes officer will inspect all work in place at the time of the inspection.
7. *Permits* – Only a safety codes officer may suspend or cancel a permit.
8. *Site Inspections* – (1) A safety codes officer will conduct site inspections at a minimum of two inspections for Part 9 or Part 3 buildings with a value of work of more than \$20,000. The final inspection stage is to be complete within 180 days of permit issuance or within 365 days of permit issuance if the homeowner is the contractor. (2) A safety codes officer will conduct site inspections at a minimum of two inspections for Commercial or Industrial buildings with a value of work over \$4,000, and a minimum of two site inspections for Single Family Residential under a homeowner permit with a value of work over \$500.00. The final inspection stage is to be complete within 180 days of permit issuance or within 365 days of permit issuance if the homeowner is the contractor.

9. *Inspection Reports* – A safety codes officer will, for each inspection required by the Quality Management Plan, complete an inspection report noting the description of the work in place at the time of inspection, all observed deficiencies, and name, signature, and designation number of the safety codes officer conducting the inspection. The Municipality will, for each required inspection, follow-up on noted deficiencies or unsafe conditions through re-inspections or at the discretion of the safety codes officer acceptance of a verification of compliance.
10. *Verification of Compliance* – A safety codes officer may, at their discretion, accept a verification of compliance as follow-up to deficiencies or unsafe conditions noted on a site inspection. A safety codes officer, when accepting a verification of compliance, will document the information to the permit file including the name and title of the person who provided the verification of compliance and how it was provided (*i.e., written assurance, verbal assurance, site visit by designate*), date accepted by the safety codes officer, and signature and designation number of the safety codes officer.
11. *Permit Services Report* – The Municipality is required to issue a Permit Services Report within 30 days of completing the compliance monitoring services as required in the Quality Management Plan. The Municipality may not issue a Permit Services Report or close a file if there is an unsafe condition, until such time as the unsafe condition is corrected.
12. The Municipality's Quality Management Plan does not include the provision that Orders are to be in accordance with legislation and the Safety Codes Council policy. The Quality Management Plan needs to be revised to include the Safety Codes Council policy requirement.

The auditors found Parkland County to be open, transparent, and cooperative with the audit. The Parkland County also showed a high level of support from management and elected officials towards safety codes operations and authority with a focus towards improvements. We thank Parkland County for their commitment to safety and the participation, involvement, and support in conducting this audit. We look forward to assisting you in the future.

SAFETY CODES COUNCIL



Gerald Baron, SCO, CTAJ
Director of Operations