

2 **What can water utilities do to improve risk management**  
3 **within their business functions? An improved tool and**  
4 **application of process benchmarking.**

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11  
12 **Abstract**

13 We present a model for benchmarking risk analysis and risk based decision  
14 making practice within organisations. It draws on behavioural and normative risk  
15 research, the principles of capability maturity modelling and our empirical  
16 observations. It codifies the processes of risk analysis and risk based decision making  
17 within a framework that distinguishes between different levels of maturity. Application  
18 of the model is detailed within the selected business functions of a water and  
19 wastewater utility. Observed risk analysis and risk based decision making practices are  
20 discussed, together with their maturity of implementation. The findings provide  
21 academics, utility professionals, and regulators a deeper understanding of the practical

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22 and theoretical underpinnings of risk management, and how distinctions can be made  
23 between organisational capabilities in this essential business process.

24

25 **Keywords:** risk analysis, management, decision theory, benchmarking, water utility.

## 26 **1. Introduction**

27 The provision of safe, reliable drinking water, the overarching goal of the water  
28 utility sector (AWWA *et al.* 2001), is within the bounds of the developed world's  
29 science, technology, and financial resources. Nevertheless, a nagging prevalence of  
30 water quality-related outbreaks remains in the developed world, with "causes" ranging  
31 from technical failures to institutional lapses and, in the extreme, negligence on the part  
32 of operating and managerial staff (Hrudey and Hrudey, 2004). Regardless of the  
33 manifestation of these incidents, one might argue that excepting "acts of God," they all  
34 derive, fundamentally, from a limited organisational capacity in learning how to  
35 prevent failures; in failures to proactively manage risk.

36 Conventionally, utilities manage risk through codifying standard design and  
37 operating procedures. Procedures develop with the introduction of improved methods  
38 and technologies (*e.g.* novel treatment processes) and by reflecting on past mishaps.  
39 From a risk management perspective, we are particularly concerned with the latter. A  
40 developmental cycle begins with a contamination event or near miss, following which  
41 incident analysis is undertaken to determine its root cause, concluding with a technical,  
42 operational or administrative solution (*e.g.* adapting design standards or operating  
43 procedures) designed to prevent its recurrence. This cycle exists at the individual  
44 utility and sector level, the latter reflected in changes to national or sector-wide codes,  
45 standards or regulations where learning is generalised; for example, regarding the  
46 pathogenic hazards associated with backwashing treatment filters. Whilst this

47 retrospective approach to managing risk is necessary, it is a mistake to consider it  
48 sufficient for risk management. Procedures can proliferate to the point where resources  
49 are diverted towards preventing incidents that have happened, rather than those most  
50 likely to happen in the future (Lee, 1998). Further, a reliance on learning by trial and  
51 error, in isolation of more proactive strategies, is unsound where public health is at  
52 stake because it is not protective. Although illustrated in a water quality context, this  
53 argument extends to all aspects of the design, operation and management of utility  
54 systems (*e.g.* from process engineering to occupational health and safety management)  
55 and across many industrial (water, waste, energy, transport) sectors.

56 Recognition of the limitations of *post-hoc* analysis is shifting the water sector  
57 towards proactive risk management, wherein utilities identify potential weaknesses and  
58 eliminate root causes of problems before failure occurs (MacGillivray *et al.*, 2006;  
59 Hamilton *et al.*, 2006; Pollard *et al.*, 2004). Our research (Pollard *et al.*, 2004; 2006;  
60 Hrudey *et al.*, 2006; Pollard *et al.*, 2007; MacGillivray *et al.*, 2007a/b) has been  
61 concerned with how we can improve organisational competencies in risk management  
62 within the utility and related sectors. We have focussed on *implementation* rather than  
63 the technical aspects of the risk and decision analysis techniques employed and here,  
64 we introduce a model for benchmarking and improving the *processes* of risk analysis  
65 and risk based decision making within utilities. We describe its application within a  
66 water and wastewater utility, and end by reflecting on our theoretical and empirical  
67 contributions.

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69

## 70 **2. Benchmarking risk analysis and risk based decision making**

71 Capability maturity models (Paulk, 1993) are simplified representations of  
72 organisational disciplines (*e.g.* software design and engineering) that codify industry

73 practice within a maturity framework. They allow distinctions to be made between  
74 organisational capabilities (*e.g.* the ability to manage risk) by reference to the maturity  
75 of the processes applied. We have published the design (MacGillivray *et al.*, 2007a)  
76 and application (MacGillivray *et al.*, 2007b) of a capability maturity model for  
77 benchmarking risk management practice within the utility sectors. This model  
78 contained eleven risk management processes at five maturity levels. The premise of the  
79 maturity levels was that once each process was enshrined in procedure, with staff  
80 trained in their application, roles and responsibilities assigned, necessary resources  
81 secured, and mechanisms in place to prevent deviations from requirements and to learn  
82 from the feedback obtained, then implementation of risk management should be of  
83 consistently high quality. The demonstrable *maturity* of risk management then  
84 becomes the benchmark of an organisation's capability to manage risk, rather than  
85 simply the presence of risk policies, techniques or champions.

86 We have since revised the model, responding to theoretical and empirical  
87 challenges derived from its application (see MacGillivray, 2007c). Our revision  
88 follows the spirit of the grounded theory approach (Glaser and Strauss, 1967; Straus  
89 and Corbin, 1994), drawing primarily upon:

- 90 (i) the capability maturity modelling and quality management literatures;
- 91 (ii) normative risk analysis and management frameworks, both specific to the  
92 water and wastewater sectors and beyond;
- 93 (iii) behavioural research on decision making under uncertainty; and
- 94 (iv) our recent empirical observations.

95 A revised model, described here, incorporates risk analysis and risk based  
96 decision making, which are comprised of distinct practices. Risk analysis (Fig. 1;  
97 Table 1) comprises the practices of system characterisation, hazard identification,

98 exposure assessment, control evaluation, consequence evaluation, likelihood  
99 evaluation, and risk evaluation. Risk analysis looks to the future to determine what can  
100 go wrong and how, the potential consequences and the relative likelihood of this, and  
101 finally the overall level of risk. Risk analysis is always part of a decision context (Aven  
102 and Kørte, 2003). Risk based decision making (Fig. 1; Table 2) is concerned with the  
103 identification and evaluation of risk management options and a managerial review prior  
104 to selecting the optimal option(s). It is informed by criteria that establish the  
105 acceptability of risk and that set out stakeholder values and concerns, which are used to  
106 assess the relative merit of alternative options.

107 Both processes are presented in five maturity levels, from *ad hoc* to adaptive,  
108 characterised by the completeness of the process (*i.e.* whether all practices are  
109 undertaken) and attributes that reflect the maturity of implementation. Maturity levels  
110 codify the extent to which each process is repeatable (level 2; L2), defined (L3),  
111 controlled (L4) and adaptive (L5). Whilst the maturity attributes (Table 3) and levels  
112 (Table 4) are specific to risk analysis, the same principles apply to risk based decision  
113 making. Note, that to achieve a given maturity level, all positive requirements of that  
114 level and the preceding levels must first be satisfied.

115

### 116 **3. Research methods**

117 What can individual utilities learn about their organisational risk management  
118 maturity and how should they respond? How far should they go to improve risk  
119 management and what actions should they take? One water and wastewater utility  
120 participated in this case study. The provision of safe, reliable drinking water depends  
121 on a range of business functions spanning the design, operation and management of  
122 water supply, wastewater treatment systems. We view the integration of risk  
123 management across the breadth of these business functions as crucial to delivering a

124 high level of competency in public health protection. Though the focus of our research  
125 is water quality, by the nature of the utility's organisation, it extended to aspects of their  
126 wastewater services. We critically assessed seven business functions: engineering;  
127 project management; drinking water quality management; network planning; asset  
128 management; emergency management; and occupational health and safety. The  
129 research methods included interview and document analysis, as described below.

130       Semi-structured interview templates were developed and applied by business  
131 function (*e.g.* asset management) and, where judged relevant, by functional discipline  
132 (*e.g.* dam safety management). Questions explored the practical form of risk  
133 management in each business function (*e.g.* "what is the process for identifying health  
134 and safety hazards within workplaces?") and its maturity of implementation (*e.g.* "are  
135 there mechanisms for quality control of risk analyses?"). Interviews (mean approx. 45  
136 min.) were conducted face to face ( $n = 32$ ) and by 'phone ( $n = 1$ ), recorded, and  
137 transcribed *verbatim* (with two exceptions, where notes were taken). Transcripts were  
138 returned to each interviewee, for comment. Finally, relevant company documentation  
139 was obtained from interviewees, the corporate intranet and the public domain (*e.g.*  
140 internet, conference articles). This included risk management policies and frameworks,  
141 risk analysis procedures and methods, accident and incident statistics and reports, water  
142 safety plans and risk analysis outputs.

143       Each business function's process maturity was assessed according to the lead  
144 author's judgement based on the data obtained, by reference to our model. We consider  
145 the subjectivity of this to be unimportant, because the principal research objective was  
146 to refine the model and illustrate its application, not necessarily to derive a maturity  
147 assessment of auditable rigour. Mechanisms to validate our findings were adopted,  
148 including sample anonymity and triangulation. Anonymity removed the potential for

149 conflicts with the goal of adding to the body of knowledge on risk management  
150 capability (as opposed to the participant’s potential desire that findings reflected  
151 positively on their organisation). Triangulation was secured through interviewing a  
152 range of representatives from each business function and cross-checking for  
153 inconsistencies in accounts, cross-checking interviewee accounts with documented  
154 sources, and providing the interviewees an opportunity to comment on drafts of the  
155 research outlined in this paper. Of the seven functions evaluated, “emergency  
156 management” was excluded from the analysis due to contradictions in the data and the  
157 limited sample of interviewees (two, compared to a minimum of three elsewhere),  
158 whilst “network planning” was excluded because of limited documentation obtained.

159

## 160 **4. Results**

161 We begin by summarising and discussing the observed risk analysis practices,  
162 before evaluating their relative maturity of implementation. We then turn to risk based  
163 decision making.

### 164 *4.1. Risk analysis: observed practices*

165 Table 5 summarises risk analysis practice within the sub-sample of business  
166 functions examined. Below, we provide a critical evaluation of the strengths and  
167 limitations of a selection of these practices.

#### 168 *4.1.1. Hazard identification*

169 The business functions within this utility adopted a range of hazard identification  
170 methods, each with their own strengths, limitations and application contexts. In  
171 occupational health and safety management for example, hazard identification was  
172 concerned with identifying physical, chemical and biological threats. These were

173 primarily identified using checklists linking known hazards with processes, equipment,  
174 workplaces, or operations, and supplemented with “*judgement formed from experience*  
175 *and knowledge of the work, past incident records, brainstorming, and system*  
176 *engineering techniques.*” The approach acknowledges the value of checklists in  
177 contexts where there is a significant body of knowledge or experience on the range and  
178 nature of potential hazards, and the notion that it is inappropriate to base hazard  
179 identification solely on lessons learned from the past, because hazards and the contexts  
180 in which they arise are fundamentally dynamic.

181         System engineering techniques were applied within the engineering function.  
182 Here, hazard identification was concerned with determining the root causes by which  
183 engineered systems may fail to operate within their design specifications. This was  
184 reflected in the utility’s use of hazard and operability studies (HAZOP). In brief,  
185 analysts examined a process (*e.g.* disinfection) subdivided into nodes. At each node,  
186 the analysts applied guidewords (*e.g.* low, high) to process parameters (*e.g.*  
187 temperature, pressure, flow) to identify ways in which the process may deviate from its  
188 design intention.

189         In contrast, neither prescription nor a definitive methodological structure was  
190 evident in project management’s approach to hazard identification, which was  
191 concerned with threats to the delivery of projects to time, to budget, and within the  
192 required quality parameters. Reflecting the unique nature of projects and their related  
193 hazards, this function adopted facilitated group brainstorming, informed by generic risk  
194 categories (*e.g.* “*economic / business risk: the risk of exceeding project budget due to,*  
195 *for example, the impact of unfavourable exchange rates on the cost of minerals*”) to  
196 stimulate dialogue and encourage a systematic and creative approach to hazard  
197 identification.



198 4.1.2. *Exposure assessment*

199 The existence of a hazard does not constitute a risk because each hazard  
200 requires a pathway (a sequence of events, actions, or processes) that, if available, leads  
201 to its realisation at a receptor. Whilst hazard identification is concerned with *what* can  
202 go wrong (*e.g.* introduction of hydrocarbons within a water supply system), exposure  
203 assessment examines the *how* and *why* (*e.g.* off-take water contaminated *via* oil  
204 emissions from inadequately maintained pumps or pipes, due to an absence of  
205 procedures or inadequate supervision and training of maintenance staff). It involves  
206 identifying possible routes to and causes of failure.

207 Consider the drinking water quality management function within our case study  
208 utility, where risk analysis was based on an adaptation of the hazard analysis and  
209 critical control points (HACCP) methodology. The method seeks to provide a basis for  
210 understanding and prioritising human health and aesthetic hazards within the water  
211 supply chain from catchment to tap. Within the function, knowledge of the  
212 environmental behaviour of hazards (*e.g.* the environmental fate and transport of  
213 pathogens) and the system under examination, technical judgement, incident reports,  
214 survey maps, and monitoring records was synthesised to link hazards within each  
215 subsystem (*e.g.* catchment: chlorine resistant pathogens) to their sources (*e.g.* dairy  
216 farming or grazing) and to the chain of events that may lead to their realisation (*e.g.*  
217 runoff or percolation from land based activities).

218 Whilst variable in rigour and method, a common theme was that each function's  
219 approach to exposure assessment – where evident – tended to focus on *how* failure  
220 events may arise, rather than addressing the in-depth root causes. They neglected to  
221 explore the reasons *why* human or technical systems fail. This is an important oversight  
222 in that easily predictable causes of failure are often manifestations of deeper,

223 underlying weaknesses (Reason, 1997). An inability to understand causal paths to  
224 failure constrains the development of risk management options targeted at the root  
225 causes of risks. Indeed, this should be the guiding basis of HACCP – in that risk (rather  
226 than hazard) management should focus at the critical points of management control;  
227 that is on those processes whose failure is likely to drive the risk (Hrudey *et al.*, 2006).

#### 228 4.1.3. Consequence evaluation

229 This practice involves identifying the nature of the consequences that follow a  
230 hazardous event (*e.g.* financial, environmental) and assessing the severity of impact. A  
231 range of techniques, from quantitative modelling to qualitative ranking were applied  
232 within our sub-sample of business functions. Applications of the former were restricted  
233 to asset management (*e.g.* event tree analysis, dam break modelling, inundation  
234 mapping, and economic impact evaluations in major dam risk analysis), with the  
235 majority of evaluations of the impact being single point estimates framed by risk  
236 ranking techniques. These techniques presented consequences according to the nature  
237 of their impact (*e.g.* financial, environmental), and a graded scale of severity expressed  
238 by descriptive benchmarks. Their application within the sub-sample of business  
239 functions was not typically underpinned by an analytical method, relying instead on the  
240 interpretation of limited data sets (*e.g.* in occupational health and safety: cost of claims,  
241 lost time due to incidents) to derive a credible consequence evaluation. Whilst this is  
242 often a practical necessity, the indeterminacy intrinsic to this approach provides scope  
243 for individuals to bias (inadvertently or not) consequence evaluations, often in subtle  
244 and difficult to detect ways such that risk analysis outcomes may reflect the desires of  
245 vested interests (*e.g.* to secure funds, or to divert attention from flaws) rather than the  
246 corporate good. Such concerns are not unique to consequence evaluation, and provide

247 a powerful rationale for quality control of the risk analysis process, which we discuss in  
248 section 4.2.4 below.

#### 249 *4.1.4. Likelihood evaluation*

250 This involves evaluating the probability that a hazardous event will occur and  
251 lead to a defined severity of consequence. In drinking water quality management,  
252 analysts sought to characterise the likelihood of hazardous events occurring and leading  
253 to a derogation of water quality standards or guidelines. Such judgements were  
254 informed by historic frequencies of exceedence (*e.g.* from turbidity monitoring data, *E.*  
255 *coli* concentrations). In some cases, these were supplemented by analysing critical  
256 variables. For example, evaluations of the likelihood of climatic and seasonal  
257 variations leading to excess levels of suspended solids in source waters were informed  
258 by analysis correlating the historic loadings of suspended solids with flow and rainfall  
259 data. However, whilst comprehensive monitoring of water quality parameters within  
260 catchments and at customer taps was routine, the absence of an overarching monitoring  
261 philosophy rooted in preventative risk management, at the treatment and disinfection  
262 plant level meant that the datasets characterising hazards within water supply systems  
263 were incomplete. As one interviewee noted, “*we do have online monitoring...but*  
264 *traditionally it’s been a fairly ad hoc process...no-one has really taken a holistic*  
265 *view...and said – I think we should have online [pH] monitors here, chlorine residual*  
266 *analysers [here and]...for these reasons.”*

267 A similar theme emerged in occupational health and safety, whose risk analysis  
268 procedure stated that likelihood evaluations “*may be determined using statistical*  
269 *analysis and calculations,”* but “*where no past data exists or is available, subjective*  
270 *estimates will be required to reflect an individual’s or groups degree of belief”* that a  
271 particular severity of consequence will occur. It further specified that experiments and

272 prototypes and economic, engineering or other models may be used to minimise  
273 subjective bias. Our observations revealed that modelling (*e.g.* event tree analysis) was  
274 restricted to isolated applications, whilst the availability of historic data (*e.g.* frequency  
275 rates by injury type, mechanism of injury, *etc.*) was paradoxically constrained by the  
276 organisation's good health and safety record. As one interviewee offered: "*the amount*  
277 *of information that we generate doesn't produce sufficient data for us to analyse...and*  
278 *that's not necessarily because of a lack of reporting, it's just that...we actually don't*  
279 *produce that many incidents.*" This was offset, in part, by reference to external data  
280 sources (*e.g.* national health and safety databases). However, these fail to reflect the  
281 unique nature of the utility's design, construction, operation, and maintenance practices  
282 and, more broadly, their working culture.

#### 283 4.2. Risk analysis: maturity of implementation

284 Having summarised (Table 5) and discussed the business functions' risk analysis  
285 practices, we now consider their maturity of implementation. Within each business  
286 function, the requirements of Level 2 maturity in risk analysis (Table 4) were satisfied  
287 (Fig. 2). A *repeatable* process was in place, characterised by explicit critical risk  
288 analysis practices. Level 2 is limited in two fundamental ways. One is that the key  
289 practices of exposure assessment and control evaluation may be absent or undertaken  
290 implicitly. With the exceptions of engineering and drinking water quality management,  
291 this was true across our sub-sample (see Table 5). This is significant because a  
292 knowledge of the pathways by which hazards are realised and of the weaknesses in the  
293 design, operation and management of existing controls, is a prerequisite to developing  
294 risk management options targeted at common and root causes of failures that are yet to  
295 arise. A further defining L2 characteristic is that the rigour and quality with which  
296 critical practices are performed depends in large part on individuals that execute and

297 manage the work, and may therefore vary considerably. Additionally, the techniques  
298 adopted may be retrospective and historical, regardless of their applicability or  
299 currency. This is because they do not fully satisfy the requirements of a defined (L3),  
300 controlled (L4) or adaptive (L5) process. However, *fully* is the key word here, as we  
301 observed each function exhibiting some of the higher level maturity attributes and so  
302 our characterisation may be somewhat harsh. We now discuss specific attributes of  
303 their maturity in risk analysis.

#### 304 *4.2.1. Initiation criteria*

305         Within many sectors, there are accepted standards of performance and codes of  
306 practice that, if adhered to, provide high degrees of control (UKOOA, 1999; Pollard *et*  
307 *al.*, 2004). These standards are applied in familiar and well-characterised situations  
308 where uncertainties and system vulnerabilities are well understood. Adhering to the  
309 historic basis for safe operations can be considered as discharging the risk management  
310 duty (Health and Safety Laboratory, 2003; UKOOA, 1999). Returning to our sample of  
311 business functions, this concept was reflected in an electrical engineer's comments:  
312 *"electricity is a dangerous thing, it's a source of high energy that can be released*  
313 *instantaneously. Obviously you need to be in control and protected satisfactorily to*  
314 *make sure that there's no risk to personnel or the property...because the technology is*  
315 *very mature...we have our own design guidelines [for electrical engineering] that*  
316 *actually emphasise...issues like lifecycle cost, security of operation, reliability,*  
317 *safety...[and so on] I don't think it is necessary to have a formalised [risk analysis]*  
318 *process [in electrical engineering], because it's part and parcel of the detailed design*  
319 *anyway."*

320         However, complex, uncertain and novel systems, with the potential to deviate  
321 from routine operation, may require risk analysis, so as to better understand what drives

322 the risk from or to the plant, process or operation (UKOOA, 1999; Pollard *et al.*, 2004).  
323 This principle extends beyond technical systems to embrace all aspects of managing a  
324 water utility. As such, a L3 attribute is the existence of initiation criteria: criteria that  
325 *initiate* the application and revision of risk analysis. Criteria observed within our sub-  
326 sample included: undertaking project risk analyses prior to full financial approval  
327 depending on the cost, complexity and novelty of the project; undertaking manual  
328 handling risk analyses in occupational health and safety management for novel, altered  
329 or relocated processes or in response to high frequency injury records or employee  
330 requests; undertaking HAZOP studies within engineering for complex or costly  
331 processes at set stages of design completeness. Timescales for revising risk analyses of  
332 various asset classes were observed in asset management. These criteria acknowledge  
333 that risk analysis is not a one-off activity, but requires regular revision to reflect system  
334 changes and the improved understanding of risks, that inevitably develops over time  
335 (*e.g.* from monitoring data, increased operator experience). In a world becoming  
336 obsessed with “the risk management of everything” (Power, 2004), an absence of these  
337 initiation criteria may drain resources, as staff are tempted to conduct risk analysis  
338 without first considering whether adherence to good practice would serve for sound risk  
339 management. At the other extreme, analysis may be applied reactively, perhaps even to  
340 provide *ex post* justifications of investment decisions (*e.g.* Health and Safety  
341 Laboratory, 2003).

#### 342 4.2.2. Stakeholder engagement

343 A further positive characteristic of the utility’s approach to risk analysis was the  
344 reflection of a broad spectrum of knowledge, skills, experience and perspectives within  
345 each function’s approach to risk analysis. One benefit of their primarily qualitative  
346 approach was that it ensured that non-specialists, or what one interviewee referred to as

347 “the people that use the systems, use the equipment and undertake the processes,”  
348 could actively participate in and critically scrutinise the process. This is key, as  
349 engaging operational staff who have practical knowledge of the hazards under  
350 examination ensures a sense of ownership and engagement in the process, as opposed  
351 to accountabilities residing within a core set of head-office experts isolated from  
352 operational reality.

### 353 4.2.3. Competence

354 As Rosness (1998) notes, the accuracy of risk analyses depends to a large extent  
355 on the competency of analysts to critically evaluate information and integrate it with  
356 their own knowledge and assumptions. A need for education and training in risk  
357 analysis remains irrespective of the technical complexity of the methods adopted.  
358 Aside from the ubiquitous “on the job” training, two elementary programmes were  
359 observed within our sub-sample: (i) internally delivered training modules within  
360 occupational health and safety, comprising an overview of the relevant legislation, the  
361 risk analysis process, and some practical exercises; and (ii) voluntary external modules  
362 for HAZOP facilitators and project managers. However, formal definitions of the  
363 competencies required of risk analysts and metrics for assessing whether they had been  
364 imparted were absent, leading one to question on what basis education and training in  
365 risk analysis was targeted, assessed and improved. This critique is not restricted to our  
366 sub-sample; there is a broader need for research on (i) the attributes and characteristics  
367 of competent risk analysts; (ii) how they can be developed within staff; and (iii) how  
368 the vigilance secured can then be measured and retained.

369 4.2.4. Verification: quality control

370 The quality control of risk analyses is intended to enhance their credibility  
371 through addressing inherent uncertainties, both epistemic, due to lack of knowledge,  
372 and operational, derived from the use of knowledge (*e.g.* analyst bias, judgements,  
373 human error; see Faber and Stewart, 2003; Amendola, 2001). This aspect was perhaps  
374 a core weakness of the sub-sample. For example, peer reviews of risk analysis were  
375 executed in a largely informal and unsystematic manner, whilst the use of facilitators  
376 was restricted to project risk analysis and HAZOP studies. That said, the role of the  
377 latter should not be underplayed, as our interviews emphasised that they did *not* drive  
378 particular outcomes or provide specific technical input, but sought to guide analysts in  
379 the application of methods and focus on the quality of process execution (*e.g.*  
380 challenging outliers during consequence evaluation, ensuring all relevant risk  
381 categories were considered during hazard identification).

382 With formalised quality control mechanisms being the exception rather than the  
383 norm, there was an implicit reliance on analyst competencies, a presumed absence of  
384 bias, and an assumed validity of the methods adopted. In practice, all risk analyses  
385 have inherent limitations and are based on assumptions rarely made explicit, and  
386 arguably, their applications are not scientific in a classical sense, but rather draw on the  
387 accumulated experiences, knowledge and bias of analysts (Aven *et al.*, 2006). As such,  
388 ignorance, assumptions, value judgements, and local perspectives distort analysis  
389 outcomes from true objectivist ideals. Given this, the utility's rescinding of the Delphi  
390 technique within their project risk analysis was disappointing. Historically, facilitated  
391 discussions and iterative anonymous voting had been used to generate consensus in risk  
392 evaluation. Characterised by group participation, anonymity and feedback loops, it  
393 minimised bias and dogma (*e.g.* reduced the reluctance of staff to abandon previously



394 stated views). One interviewee suggested that since the approach had been abandoned,  
395 evaluations tended to reflect the subjective judgement of lone experts, which “*typically*  
396 *went unchallenged.*” This may be viewed as a pyrrhic victory for those who railed  
397 against this symbol of “bureaucracy,” and a timely warning that the much maligned  
398 concepts of due process, of checks and balances, can suppress greater evils.

#### 399 *4.3. Risk based decision making: observed practices*

400 Table 6 summarises risk based decision making practice within the sub-sample.  
401 Below, we evaluate the strengths and limitations of a selection of these practices.

##### 402 *4.3.1. Establish criteria for evaluating alternative risk management options*

403 A range of risk management measures may be considered for a particular  
404 decision. Consider drinking water quality management. Options for reducing risks to  
405 public health posed by waterborne pathogens include: enhancing the monitoring of  
406 indicator organisms in source waters (*e.g. E. coli*), catchment protection (*e.g. fencing,*  
407 *or exclusion zones for livestock*), infrastructure upgrades (*e.g. filtration flow control*),  
408 chlorine residual monitoring and operator training. The objective of each option is to  
409 reduce the risk to a level considered acceptable. The decision as to which option(s) is  
410 considered the best is influenced by many factors. Notwithstanding that all risk  
411 management decisions are value-laden, in best practice organisations these factors are  
412 reflected in explicit criteria used to evaluate the relative merit of alternative options.

413 As cost benefit analysis is linked to determining of whether risk management  
414 options satisfy the “as low as reasonably practicable” (ALARP) criteria adopted within  
415 the sub-sample, it is tempting to consider the balancing of costs and benefits as an  
416 evaluation criterion. However, we propose cost benefit analysis is best viewed as a  
417 methodology for evaluating the relative utility of a risk management option. It does not

418 prescribe whether one should simply balance the financial expense of implementing an  
419 option with the benefits of the risk reduction, or whether one should incorporate less  
420 tangible aspects such as technical feasibility, social values such as equity and  
421 distribution, or political concerns. In other words, it leaves the evaluation criteria  
422 unspecified. Whilst our research revealed that a broad range of criteria guided the  
423 evaluation of risk management options within our sub-sample, they were only made  
424 explicit within asset management's risk-based approach to prioritising mains  
425 replacement and dam safety upgrades (Table 6). As such, one can expect what Arvai *et*  
426 *al.* (2001) termed "alternative focussed" decision making to predominate. This is  
427 characterised by an analysis of available alternatives followed by selection of the  
428 "optimal" option from a set of implied or poorly defined criteria. It is not desirable for  
429 a decision process to dictate or prescribe decisions, as an overly mechanical approach  
430 fails to recognise the human aspects of performing difficult value judgements under  
431 uncertainty (Aven *et al.*, 2006). However, expressing the criteria against which those  
432 judgements should be taken ensures that the rationale for decisions is constructed *a*  
433 *priori* in a deliberative manner, rather than rationalised *post hoc*. Aside from  
434 improving risk management, explicit criteria serve to better equip utilities to manage  
435 *risk issues*, as they (i) provide a mechanism for reflecting legitimate stakeholder  
436 concerns in utility decision making (*e.g.* by incorporating public values and  
437 preferences); and (ii) provide a documented, defensible rationale for decision on risk.

#### 438 4.3.2. *Identify risk management options*

439 This practice is concerned with generating alternative solutions for managing  
440 risk. Within the business functions, it was typically undertaken within creative  
441 workshops involving a diverse range of stakeholders. The value of brainstorming,  
442 which seeks to stimulate innovation through open interaction and feedback, was cited

443 by various interviewees, one noting that it “*empowers people to think; the worst [thing]*  
444 *that you can do is take away people’s creativity.*” Furthermore, engaging stakeholders  
445 with diverse skills and backgrounds helps identify and address those assumptions,  
446 constraints and biases that can have a significant influence on the generation of  
447 alternatives (Aven and Kørte, 2003). Whilst primarily creative, within some functions  
448 this practice was informed by checklists of risk reduction alternatives. One example  
449 was occupational health and safety management’s hierarchy of risk controls (control  
450 banding), which classified: engineering controls for hazard removal (*e.g.* substitution,  
451 isolation, modification to design, guarding and mechanical ventilation); administrative  
452 controls for preventing the occurrence of hazardous events (*e.g.* safe work practices, or  
453 procedures, training, supervision, nominating maximum exposure times); and personal  
454 protective equipment for minimising their severity of consequences.

455         Perhaps the most important factor was the depth and rigour of the risk analyses.  
456 Consider risk analysis within drinking water quality management. Recall that hazards  
457 identified within each subsystem (*e.g.* catchment: pathogens) were linked to their  
458 sources (*e.g.* dairy farming or grazing) and the events that may lead to their realisation  
459 (*e.g.* runoff or percolation from land based activities). Detailed surveys were  
460 undertaken exploring the adequacy of design, management and operation of those  
461 actions, activities and processes applied to mitigate the introduction or transport of said  
462 hazards from catchment to customer tap (*e.g.* catchment protection, pre-treatment,  
463 ozonation, *etc.*). We propose that systematically identifying the underlying  
464 mechanisms through which hazardous events may occur, *before* evaluating the latent  
465 and active weaknesses in their control mechanisms, is the normative approach to  
466 identifying risk management options. The overarching purpose of risk analysis should  
467 be to develop a better understanding of the factors governing system reliability, rather

468 than a “numbers game” (*e.g.* to simply satisfy quantitative risk acceptance criteria;  
469 Faber and Stewart, 2003). When used diagnostically, risk analysis represents an  
470 efficient tool for improving system safety and performance.

#### 471 4.3.3. Evaluate options

472 We now turn to the evaluation of risk management options. There are three  
473 elements to this practice: (i) forecasting the impact of options against each evaluation  
474 criteria (*e.g.* technical feasibility); (ii) determining the relative merit of each option; and  
475 (iii) determining the acceptability of the residual risk, post-implementation.

476 Methods for achieving the former within our sub-sample of business functions  
477 included applying professional judgement, stakeholder consultations, cost-estimations,  
478 and engineering studies (*e.g.* feasibility studies in major dam safety management). This  
479 said, recall that in most business functions evaluation criteria were not defined, and so  
480 this element often tended towards the informal or implicit. For the second element, the  
481 cost-benefit approach was widely adopted for assessing the relative merit of alternative  
482 risk management options. Formal mathematical analyses were restricted to risk  
483 management options that took the form of major capital projects (*e.g.* in major dam  
484 safety management). More commonly, managerial judgement was used to balance  
485 costs and benefits, at times informed by cost-effectiveness evaluations of risk reduction  
486 per unit (Euro) spent. Thus, the determination of whether risks satisfied the ALARP  
487 criteria was judgement-based, rather than informed by an explicit evaluation of the  
488 costs and benefits of reducing vs. maintaining risk levels.

489 We present two justifications for the variable rigour and formality that  
490 characterised this practice: (i) that the resources expended in decision analysis must be  
491 justified by the benefit of better decisions, and so detailed analysis is neither desirable  
492 nor justifiable for every decision; and (ii) that evaluation criteria incorporating

493 intangible dimensions are difficult to incorporate within the analytic framework of cost  
494 benefit analysis.

#### 495 *4.4. Risk based decision making: maturity of implementation*

496 The sub-sample's risk based decision making profile mirrors that of risk analysis  
497 (Fig. 2). However, the decision making processes were less mature, and characterised  
498 by a lesser degree of definition. One implication is that we may expect a lesser degree  
499 of rigour and formality in risk based decision making. Perhaps this reflects an  
500 organisational culture that values judgement, intuition, and creativity of decision above  
501 prescription. However, our model is intended to guide, not prescribe, decision making  
502 with the objective of encouraging a high degree of consistency, credibility, and  
503 confidence in the outcomes. In the absence of a clear framework, people struggle to  
504 identify their full range of values and concerns in a given decision context, and are ill-  
505 equipped to perform the complex trade-offs common to risk based decision making  
506 (Arvai *et al.*, 2001; Slovic *et al.*, 1977; Payne *et al.*, 1992; Slovic, 1995; Matheson and  
507 Matheson, 1998). It does not require a strong grasp of decision theory to conclude that  
508 an aversion to decision frameworks, however motivated, is not conducive to sound risk  
509 management.

510

## 511 **5. Discussion**

512 We now critically evaluate our contribution, which is three-fold. We have (a)  
513 synthesised empirical observations with prior behavioral and normative risk research to  
514 codify the processes of risk analysis and risk based decision making; (b) placed these  
515 processes within a maturity framework that distinguishes between levels of  
516 implementation, from *ad hoc* to adaptive; and (c) provided a comparative analysis of

517 risk analysis and risk based decision making across a range of utility business  
518 functions.

519

### 520 *5.1. Coding of risk analysis*

521 Consider the codification of risk analysis (Fig. 1; Table 1), best described by  
522 reference to the prominent risk frameworks that adopt an organisation-wide focus (*e.g.*  
523 COSO, 2004; AS/NZS, 1999, 2004; FERMA, 2003) and those for drinking water  
524 quality management (NZMOH, 2001; NHMRC, 2001, 2004; WHO, 2002, 2004). Our  
525 inclusion of exposure assessment is distinctive because strategic risk management  
526 frameworks tend to focus on finding sources of potential harm, to the neglect of the  
527 underlying pathways that lead to their realisation (*i.e.* how and why hazardous events  
528 may occur). This focus on root causes is mirrored in our treatment of control  
529 evaluation, which involves identifying and assessing existing technical, physical and  
530 administrative controls. These are important advances, because the neglect of causal  
531 pathways to failure and latent weaknesses in system defences impedes the development  
532 of risk management measures targeted at the root causes, and therefore, promotes a  
533 focus on hazard, rather than risk, management.

534 We have placed consequence evaluation prior to likelihood evaluation. The  
535 majority of frameworks consider the order in which they are performed to be  
536 interchangeable, or at least make no explicit reference to the matter (*e.g.* COSO, 2004;  
537 AS/NZS, 1999, 2004; FERMA, 2003). Our reasoning is that the outcome(s) should be  
538 defined prior to any evaluation of the likelihood of occurrence. If these steps are  
539 performed in reverse, likelihood evaluation tends to be concerned only with the  
540 likelihood of a hazardous event occurring (*e.g.* the probability of asset failure), rather  
541 than with the likelihood of an event occurring *and* leading to a defined outcome (*e.g.*

542 the probability of an asset failing and leading to a given environmental impact). The  
543 former approach overestimates risk. This is not a purely theoretical danger; our  
544 research has revealed instances of its occurrence (MacGillivray *et al.*, 2007b).

545

## 546 5.2. Coding of risk based decision making

547 Strategic risk management frameworks (*e.g.* COSO, 2004; AS/NZS, 1999, 2004;  
548 FERMA, 2003) conventionally treat risk based decision making, namely the  
549 identification, evaluation and selection of options to manage risks, in a somewhat  
550 cursory manner. And so the novelty of our coding (Fig. 1; Table 2) is best illustrated  
551 with reference to the decision theory literature. Notably, we have separated “evaluate  
552 options” into three elements: (i) forecasting the impact of options against each  
553 evaluation criteria (*e.g.* technical feasibility); (ii) determining the relative merit of each  
554 option; and (iii) determining the acceptability of the residual risk associated with each  
555 option. We believe this provides an important advance to option evaluation, moving  
556 beyond the notion that the acceptability of a risk can be determined without considering  
557 the costs and benefits of maintaining vs. reducing risk levels (*e.g.* in using measures of  
558 risk as proxies for risk acceptability).

559 We also highlight our inclusion of managerial review and option selection prior to  
560 the final risk management decision. Whilst not novel (*e.g.* Aven *et al.*, 2006), it is  
561 crucial because it highlights our view that decision analysis should compliment, but not  
562 replace, the knowledge, intuitions and judgement of decision makers (Mintzberg,  
563 1994). Further, risk based decisions should not reflect theoretically or analytically  
564 derived perspectives that run counter to sound professional judgement (Hrudey and  
565 Hrudey, 2003). More specifically, it emphasises that because risk is at heart, an  
566 expression of uncertainty (Amendola, 2001), the outputs of a decision analysis must be

567 treated diagnostically rather than deterministically, *i.e.*, they should provide decision  
568 support, not *carte blanche* decisions.

569

### 570 *5.3. Coding of maturity*

571 Our research applies capability maturity modelling principles to the processes of  
572 risk analysis and risk based decision making (Tables 3 and 4). It allows users to  
573 distinguish the relative maturity of implementation of risk analysis and risk based  
574 decision making, presumed to correlate this with performance in managing risk. The  
575 origins and logic of the hierarchy of maturity levels, particularly regarding the selection  
576 and definition of attributes used to define process maturity, are summarised in Table 3  
577 (for more detail, see MacGillivray, 2007c). This hierarchy is the heart of our model,  
578 and the most valuable contribution by virtue of its usefulness as discussed below.

579

### 580 *5.4. Utility of the model for benchmarking*

581 Throughout our work we have been concerned with improving risk management  
582 practice and we are interested in vigilance on the ground. Hence we ask, who may use  
583 the model we have developed, and what will it enable them to do that they were  
584 previously unable to? The most obvious function of the model is as a tool for research  
585 on the form and, crucially, *implementation* of risk management within industry. At a  
586 basic level, this is valuable, because published investigations of the latter tend towards  
587 the anecdotal rather than methodologically rigorous (*e.g.* Dalgleish and Cooper, 2005;  
588 Aabo *et al.*, 2005). From an organisational perspective, its principal function is  
589 benchmarking, which enables organisations to compare themselves against others in  
590 their sector and beyond, and to identify and incorporate best practices. This is crucial  
591 because risk management remains ethereal to many in terms of practice on the ground,



592 creating a need for the systematic evaluation of strengths and weaknesses and the  
593 sharing of best practice. It may also be used to drive improvements in the capabilities  
594 of key suppliers and partners (*e.g.* through using maturity evaluations to inform  
595 supplier selection). Finally, we consider its potential within regulation, envisaging that  
596 it may facilitate a step-change in the approach to regulating risk within utility sectors  
597 from its current focus on reactive, outcome based approaches (*e.g.* water quality  
598 standards) and prescriptions (*e.g.* codes and regulations), towards a proactive,  
599 capability based approach.

600

### 601 *5.5. Empirical findings*

602 Finally, we consider the contribution of our case study observations in their own  
603 right. Three observations bear emphasising: descriptive risk research; a focus on the  
604 implementation of risk management; and a cross-functional perspective. We highlight  
605 the first due to the lack of theoretically informed descriptive risk research within the  
606 water utility sector. The importance of the second is borne out by casting our eyes  
607 beyond this sector, where one observes that academic treatments of risk management  
608 tend to focus on technical and normative aspects, rather than institutional, behavioural,  
609 or descriptive facets, which our findings stress. Finally, our function-specific approach  
610 counters the concept of “enterprise wide risk management,” which appears to have  
611 created a majority opinion amongst its practitioners that risk management is an over-  
612 arching strategic discipline rather than a devolved process with variations and nuances  
613 of application within individual business functions.

614

615 **6. Conclusions**

616 We present a capability maturity model for benchmarking and improving risk  
617 analysis and risk based decision making, and illustrate its application to a cross-section  
618 of water and wastewater utility functions within a single utility. The insight offered is  
619 three-fold:

- 620 • a synthesis of empirical observations with behavioral and normative risk  
621 research to codify the processes of risk analysis and risk based decision making;
- 622 • an arrangement of these processes within a maturity framework that  
623 distinguishes their relative maturity of implementation from *ad hoc* to adaptive;
- 624 • a critical evaluation of the methods, techniques and maturity of risk analysis and  
625 risk based decision making across a range of utility functions.

626 These findings provide researchers, utility managers, engineers, asset managers,  
627 occupational health and safety representatives, public health officials, project managers,  
628 chief finance officers and regulators a deeper understanding of the practical form and  
629 theoretical underpinnings of risk management, and how distinctions can be made  
630 between organisational capabilities. This addresses an important gap in the literature  
631 because, although the premise that institutional capacities rather than technical aspects  
632 are the fundamental limiting factor in implementing risk management has earlier  
633 origins (*e.g.* Garrick, 1988; Luehrman, 1997; Strutt, 2006), there remains a dearth of  
634 descriptive research on the practical form of risk management within the utility sectors  
635 and, particularly, how it may be embedded. The latter is the subject of our ongoing  
636 research.

637

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645

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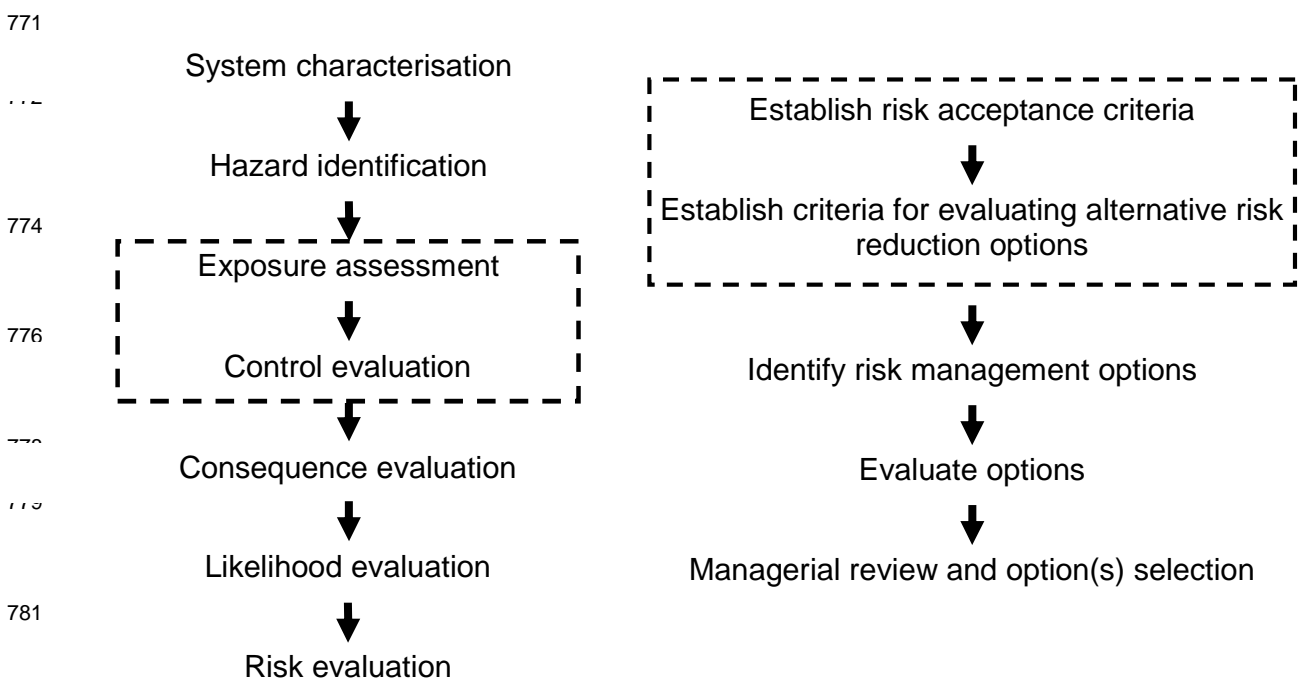
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784 Fig. 1. Risk analysis (left) and risk based decision making practices (right). Those encased  
 785 are considered key rather than critical, an important distinction in evaluating process  
 786 maturity.



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796 Key: DWQM: drinking water quality management; AM: asset management; OH&S: occupational health and safety

797 management; ENG: engineering; PM: project management.

798

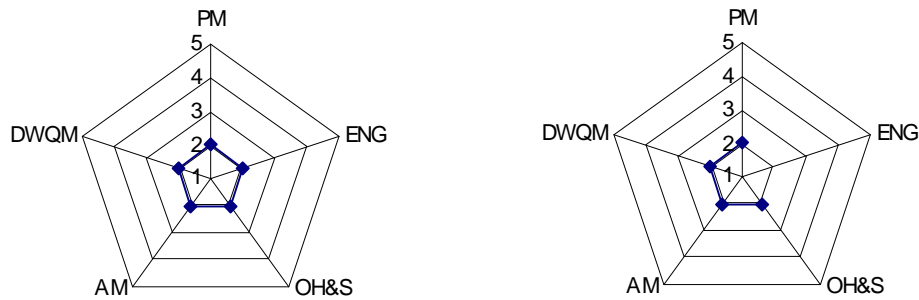
799 Fig. 2. Spider diagram illustrating the maturity of implementation of risk analysis (left)

800 and risk based decision making (right) within the sub-sample (insufficient data was

801 obtained to evaluate the latter within engineering).

802 Table 1 Descriptions of the risk analysis practices and of the rationale for their inclusion in our

803 model



Risk analysis practice	Description	Rationale
System characterisation	To establish and describe the system with which risk analysis is concerned ( <i>e.g.</i> workplace, engineering process, project).	A comprehensive system understanding is a <i>sine qua non</i> for generating risk analysis outcomes that are valid and accepted by stakeholders.
Hazard identification	Identifying situations, events, or substances with the potential for causing adverse consequences, <i>i.e.</i> sources of harm or threats to the system.	A hazard left unidentified is excluded from subsequent analysis.
Exposure assessment	Whilst hazard identification is concerned with <i>what</i> can go wrong,	The potential existence of a hazard does not in itself constitute a risk, as each hazard

	precursor identification focuses on <i>how</i> and <i>why</i> things can go wrong, in other words identifying possible routes to and causes of failure.	requires a process or pathway (precursor) to lead to its realisation. Thus, the value of this practice lies in both confirming the existence of pathways to failure (and therefore that a risk exists) and informing the development of risk management options focussed at root causes.
Control evaluation	The identification and assessment of existing technical, physical and administrative controls which may either reduce the likelihood of a hazardous event occurring, or serve to mitigate its severity of consequences. Assessment should address both the criticality of the controls ( <i>e.g.</i> based on their inherent capacity to reduce risk, whether they are proactive or reactive, <i>etc.</i> ) and their adequacy of design, management and operation.	An evaluation of existing controls: informs the evaluation of associated risk levels; serves to inform the development of risk management options through identifying latent and active control weaknesses ( <i>i.e.</i> through serving as a gap analysis of existing risk management measures); and captures the historic basis for safe, reliable system operation.
Consequence evaluation	Identifying the nature of the consequences of a hazardous event occurring ( <i>e.g.</i> financial, environmental) and assessing their severity of impact.	Deriving and combining measures of consequence and likelihood are required to establish the overall level of risk associated with a given hazard, so that management resources may be allocated accordingly and to assess the desirability of potential risk management measures ( <i>e.g.</i> to see if they satisfy the ALARP criteria).
Likelihood evaluation	The evaluation of the likelihood ( <i>i.e.</i> frequency or probability) that a hazardous event will occur and lead to a defined severity of consequence.	
Risk evaluation	Combining measures of likelihood and consequence severity to derive an overall measure of risk, either qualitative ( <i>e.g.</i> high, low) or quantitative ( <i>e.g.</i> expected loss of life, value at risk).	

804 Table 2 Descriptions of the risk based decision making practices and of the rationale for their  
 805 inclusion in our model

<b>Risk based decision making practice</b>	<b>Description</b>	<b>Rationale</b>
Establish risk acceptance criteria	Establishing criteria for evaluating the acceptability of risk.	In the absence of such criteria, on what basis are decisions taken on whether to mitigate or accept risk?
Establish criteria for evaluating alternative risk management options	Establishing criteria used to evaluate the relative merit of alternative risk management options ( <i>e.g.</i> forecast risk reduction, technical feasibility, cost of implementation, latency of effects, environmental impacts, <i>etc.</i> ) and, where deemed appropriate ( <i>e.g.</i> where multi-attribute analysis is subsequently undertaken), weightings to establish their relative importance.	A range of risk management options may be considered for a particular decision context; the decision as to which is considered the best option is influenced by many factors. Different concerns and values often need to be considered simultaneously, and their relative importance may be valued differently by various stakeholders (Faber and Stewart, 2003). Making this explicit in the form of criteria can improve the credibility and defensibility of decision making, minimise the possibility that decisions will be second guessed or that their rationale be forgotten, remove barriers to stakeholder buy-in, and ensure the existence of an audit trail (SEI, 2002). More broadly, it enables value rather than “alternative focussed” decision making, the latter being characterised by the selection of an “optimal” option from a set of implied or poorly defined criteria (Arvai <i>et al.</i> , 2001).
Identify risk management options	Generating alternative solutions for the decision problem.	Options not generated are excluded from subsequent evaluation and, ultimately, implementation.

Evaluate options	There are three elements to this: forecasting the impact of each option against the individual evaluation criteria; determining the relative merit of each option ( <i>e.g.</i> via cost-benefit analysis, multi-attribute analysis); and determining risk acceptability.	Systematically evaluating the individual and cumulative merits of alternative options should provide for more credible, defensible and rational risk based decision making. Determining risk acceptability follows as it is risk management options, not risks, which are unacceptable or acceptable (Fischhoff <i>et al.</i> , 1981), <i>i.e.</i> the acceptability of risk cannot be determined without considering the costs and benefits of maintaining vs. reducing current risk levels.
Managerial review and option(s) selection	The application of managerial judgement in reviewing the premises, assumptions, and limitations of analyses, prior to the final decision (after Aven <i>et al.</i> , 2006).	In line with Mintzberg (1994), we consider that decision analysis should compliment, but not replace, the knowledge, intuitions and judgement of decision makers, and further, that risk based decisions should not reflect theoretically or analytically derived perspectives that run counter to sound professional judgement (Hrudey and Hrudey, 2003). More specifically, given that risk is, at a fundamental level, an expression of uncertainty, and that the analysis of risk and decision alternatives is further subject to aleatory, epistemic and operational uncertainty (Amendola, 2001), the outputs must be treated diagnostically rather than deterministically, <i>i.e.</i> , they should provide decision support, not decisions.

Table 3 Descriptions of the risk analysis process maturity attributes and their rationale for inclusion within our model

Attribute	Description	Rationale	Key aspects
Procedures	The rules guiding the execution of risk analysis.	Procedures serve to capture and disseminate knowledge of the optimal conduct of risk analysis so that it is maintained within the organisational memory rather than as hidden expert knowledge (NEA/CSNI, 1999), and so ensure its consistent, efficient conduct.	Appropriate standardisation and formalisation of procedures taking into account personnel experience and knowledge; participation of end users ( <i>e.g.</i> risk analysts) in their development; matching detail with complexity of work; making explicit the rationale for conducting risk analyses; being based on an analysis of the tasks required (NEA/CSNI, 1999; Health and Safety Laboratory, 2003).
Roles and responsibilities	Assignment of personnel to risk analysis roles and responsibilities.	To avoid the “not my job” phenomenon (Joy and Griffiths, 2005), and ensure risk analysis receives appropriate focus and resource allocations.	Matching role descriptions and assignment of responsibilities with personnel competencies and authorities (NEA/CSNI, 1999). Supporting well meaning statements that “risk management is everyone’s job” with specific requirements.
Initiation criteria	Stages or conditions which initiate risk analysis.	To ensure risk analyses is undertaken as required, rather than being initiated on an <i>ad hoc</i> , over zealous, or reactive basis, or marginalised as “make work.”	Identifying where risk analysis is necessary vs. where adherence to codes and standards can be said to discharge the duty (Health and Safety Laboratory, 2003; UKOOA, 1999), and making this explicit in cyclical and event-based criteria.
Resource management	The planning, acquisition, and deployment of funds, techniques and staff in support of risk analysis.	Resourcing of risk analysis is particularly critical during periods of reduced budgets and downsizing, which may bring an emphasis on economic rather than safe operation (NEA/CSNI, 1999).	Sufficiency and availability of financial resources; access to sufficiently competent human resources; and a range of risk analysis techniques which reflect the complexity of the organisation’s activities and working environment (Health and Safety Laboratory, 2003).
Input data management	The identification, collection, and storage of risk analysis data inputs.	The systematic identification and capture of data requirements serves to ensure analyses are underpinned by objective data evaluation, rather than reflecting best guesses in the guise of “expert judgement.”	The definition of data requirements / data sources for risk analysis, either at the process level or, where not practical, on a case by case basis, and mapping these to data collection and storage systems.

Output data management	The collection, storage and dissemination of risk analysis outputs.	Risk analysis outputs must be systematically recorded to inform decision makers, for audit and training purposes, and to facilitate future reviews (COSO, 2004; CSA, 2004). Further, this ensures staff have current knowledge of the human, technical, organisational and environmental factors that govern system safety (Reason, 1997).	Documenting in-depth the risk analysis outcomes, not simply the overall level of risk ( <i>e.g.</i> sources of data, assumptions used, methods followed, <i>etc.</i> ). Although in theory the storage media is unimportant as long as the outputs are easily retrievable (Health and Safety Laboratory, 2003), IT-based data systems (risk registers) have significant advantages, particularly in facilitating information flow between and across layers and boundaries of the organisation (COSO, 2004).
Verification	Ensuring compliance with risk analysis procedures, and providing quality control of the execution of risk analysis.	The mere existence of procedures is not in itself enough to ensure that staff actions will be consistent with them (Hoyle, 2001; ISO, 2000). Errors of omission or commission ( <i>e.g.</i> due to misunderstanding instructions, carelessness, fatigue or management override), may cause deviations. Similarly, procedural compliance does not ensure the quality of execution of risk analysis.	Implementation of mechanisms to ensure adherence to procedures ( <i>e.g.</i> auditing, “sign offs”) and to sanction non-compliance. Quality control mechanisms ( <i>e.g.</i> peer reviews, Delphi panels) should be implemented with explicit methods for controlling ( <i>e.g.</i> establishing group consensus iteratively) or evaluating ( <i>e.g.</i> quality criteria) the quality of analyses. An appropriate balance between the resources required, the constraints of bureaucracy, and the benefits of process control should be struck.
Validation	Assessing the fundamental correctness of the risk analysis process design ( <i>e.g.</i> that the correct techniques are being applied, that the correct initiation criteria are in place).	The willingness and means to question the validity of current risk analysis practices is required to show due diligence and ensure that current practices are legitimate, and is further a prerequisite to the continual improvement of risk analysis.	Formalised approaches to validation include: statistical or mathematical approaches to validating technical methodologies, independent peer reviews, and benchmarking surveys; and informally may draw upon: professional networks, trade and scientific literature, <i>etc.</i>

Organisational learning	The manner in which the organisation identifies, evaluates and implements improvements to the design and execution of risk analysis.	Mechanisms for verification and validation are mere panaceas if their findings are not acted upon, <i>i.e.</i> , if they are not used to rectify deficiencies in the design and execution of risk analysis.	Reviews should: be undertaken at specified intervals and on an event driven-basis; consider a broad range of internal and external feedback; focus on improving the validity of the risk analysis process and the effectiveness of its execution, not on ensuring it complies with a given standard; treat errors of omission or commission in the execution of risk analysis not as isolated lapses requiring sanction to prevent their re-occurrence, but as opportunities to identify and resolve root and common causes of error; and be supported by a learning culture, wherein current methods and approaches to risk analysis, and their underlying assumptions, are open to question and critical evaluation.
Stakeholder engagement	The engagement of stakeholders, both internal and external to the utility, for the purpose of harnessing a broad range of perspectives, knowledge, skills and experience.	The legitimacy of risk analysis outputs depends upon appropriately broad stakeholder engagement, as risk is an intrinsically multi-faceted construct, whose comprehensive understanding is often beyond the capabilities of individuals or small groups.	A team approach to risk analysis which pools the knowledge, skills, expertise and experience of a range of perspectives is preferable (Health and Safety Laboratory, 2003; MHU, 2003; Joy and Griffiths, 2005). External stakeholders may be engaged to: capture expertise ( <i>e.g.</i> consultants); confer additional legitimacy on the analyses; communicate due diligence ( <i>e.g.</i> regulators); and capture community values and ensure they are incorporated within the analysis.
Competence	The ability to demonstrate knowledge, skills, and experience in risk analysis to the level required (Health and Safety Laboratory, 2003).	The legitimacy of risk analyses outcomes depends to a large extent on the capacity of staff to critically evaluate available information and to supplement it with their own knowledge and plausible assumptions (Rosness, 1998) , <i>i.e.</i> on staff competencies.	Definition of required staff competencies in risk analysis; evaluation and implementation of appropriate education and training vehicles to develop / maintain those competencies ( <i>e.g.</i> class room learning, external workshops); providing “on the job” training under adequate supervision; designing and implementing methods for evaluating the efficacy of educating and training ( <i>e.g.</i> for measuring that the required competencies have been imparted).

1 Table 4 Descriptions of the risk analysis process maturity hierarchy, from ad hoc to adaptive

LEVEL 5: <i>Adaptive</i>	Validation	A broad range of mechanisms are in place to capture feedback potentially challenging the validity of the risk analysis process ( <i>e.g.</i> benchmarking surveys, professional networks, external peer reviews, mathematical validation of technical methodologies).
	Organisational learning	Norms and assumptions underpinning the design of the risk analysis process are openly questioned, critically evaluated and, where appropriate, revised in light of validation findings ( <i>i.e.</i> double loop learning).
LEVEL 4: <i>Controlled</i>	Verification	Verification extends beyond rigorous mechanisms to ensure procedural compliance ( <i>e.g.</i> sign offs supplemented by in-depth audits) to provide formal quality control of risk analyses ( <i>e.g.</i> peer reviews, challenge procedures, external facilitation, Delphi technique, <i>etc.</i> ).
	Organisational learning	Root and common causes of errors in the execution of risk analysis ( <i>e.g.</i> deficient communication, overly complex procedures, lack of education and training) are identified and resolved. Modifications to the design of the process are identified, evaluated and implemented within periodic and event-driven reviews, but remain largely reactive and externally driven ( <i>i.e.</i> mirroring changes to codes, standards, guidelines, <i>etc.</i> ).
LEVEL 3: <i>Defined</i>	<b>The critical and key risk analysis practices are explicitly undertaken.</b>	
	Procedures	Procedures exist to guide the execution of risk analysis, with an appropriate degree of standardisation, detail, and complexity.
	Roles and responsibilities	Risk analysis roles and responsibilities are allocated with sufficient regard for staff competencies and authorities.
	Initiation Criteria	Cyclical and event-based criteria are in place to guide the initiation of risk analyses.
	Resource management	The requisite monetary, human and technical resources are identified, acquired and deployed in support of risk analysis.
	Input data management	The requisite data inputs are identified, acquired and deployed in support of risk analysis.
	Output data management	Risk analysis outputs are collected, stored and disseminated in a manner that supports decision-making, satisfies audit requirements, and facilitates organisational learning.
	Verification	Basic mechanisms are in place to ensure compliance with risk analysis procedures, focussing on outputs rather than tasks performed ( <i>e.g.</i> sign offs on receipt of completed risk analyses).
	Validation	The validity of the risk analysis process is questioned in light of changes to regulations, codes and standards.
	Organisational learning	Non-compliances with risk analysis procedures are resolved on a case by case basis ( <i>i.e.</i> treated as isolated errors requiring sanction to prevent their recurrence). Improvements to the design of the risk analysis process are implemented in a reactive, <i>ad hoc</i> manner ( <i>e.g.</i> in response to changes in codes or regulations).
	Stakeholder engagement	A broad cross section of internal and external knowledge, experience, skills and perspectives is reflected within risk analysis, based on explicit guidelines or criteria for stakeholder engagement.
Competence	Staff exhibit adequate knowledge, skills and experience in risk analysis. Education and training in risk analysis is planned and executed based on established competency requirements.	
LEVEL 2: <i>Repeatable</i>	<b>The critical risk analysis practices are explicitly undertaken.</b>	
LEVEL 1: <i>Ad hoc</i>	<b>Risk analysis is absent; or the critical practices are implicitly or incompletely performed.</b>	



1 Table 5 Summary of the undertaking of each risk analysis practice within the sub-sample

	Drinking water quality management	Occupational health and safety management	Asset management		Project management	Engineering
			Treatment plants	Major dams*		
System characterisation	Schematics of water supply systems were produced. Data was obtained to characterise the following system elements: catchment ( <i>e.g.</i> geomorphology, climate, land uses); source water ( <i>e.g.</i> surface or ground water, flow and reliability, seasonal changes); storage tanks, reservoirs and intakes ( <i>e.g.</i> detention times, design); treatment and distribution systems ( <i>e.g.</i> processes, configuration, monitoring); current operational procedures; point sources of pollution; and consumers ( <i>e.g.</i> population, demand patterns).	Checklists were used to interrogate characteristics of the work spaces and the type and methods of work to be undertaken ( <i>e.g.</i> existence / location of pits, shafts, ducts, pressure vessels, access and egress routes, ventilation, isolation and lockout procedures, substances used, <i>etc.</i> ).	Plant components were identified, their condition and performance evaluated through asset inspections, and current operating and maintenance regimes detailed.	Engineering assessments of dams were undertaken, drawing on technical reports, site visits, flood and earthquake loadings, dam safety standards, <i>etc.</i>	Project options were characterised through scope development and value management workshops. These detailed the project need and relevant assumptions and constraints, before characterising each option in terms including their: functional specifications, capacities, required inputs and outputs, and relative costs and benefits.	Prior to the application of HAZOP studies, process and instrumentation diagrams – which show the interconnection of process equipment and the instrumentation used for process control – were created.
Hazard identification	Chemical, microbiological, physical and radiological water quality hazards ( <i>e.g.</i> chlorine sensitive pathogens) were identified on a	Hazards were identified via the use of task, substance and workplace specific checklists. Where deemed relevant, this	A FMECA-type approach linked potential hazards ( <i>e.g.</i> supernatant	Significant failure modes (flood, earthquake, and static loading) were	Hazards threatening the delivery of the project option(s) on time, to budget, and within the	HAZOP studies identified potential deviations from process design intent ( <i>i.e.</i>

	system and sub-system ( <i>e.g.</i> catchment, treatment) specific basis through a checklist-based approach.	was supplemented by systems engineering techniques, incident and near miss records, and brainstorming.	overflows to surroundings or temporary pipework pumps) to their direct causes ( <i>e.g.</i> not enough capacity to hold	identified.	required quality parameters, were identified through facilitated brainstorming, structured with reference to generic hazard categories.	hazards) through the application of guide words ( <i>e.g.</i> low, high, none) to process parameters ( <i>e.g.</i> ozone flow).
Exposure assessment	Knowledge of the environmental behaviour of hazards and the system under examination, technical judgement, incident reports, survey maps, and monitoring records were synthesised to link hazards ( <i>e.g.</i> chlorine sensitive pathogens) to their sources ( <i>e.g.</i> dairy farming or grazing) and to the events which may lead to their realisation ( <i>e.g.</i> runoff or percolation from land based activities).	There was an absence of explicit provisions for identifying the precursors to identified hazards, one exception being for hazards arising from manual handling activities, where checklists examined which aspects of the actions and movements, workplace layout, and working posture generated said hazards.	or evaporate sludge received) for each component and for the plant as a whole. Informed by site visits, incident records, and feedback from operating and maintenance staff.	No inference possible.	Hazards ( <i>e.g.</i> aqueduct erosion) were linked to their direct causes ( <i>e.g.</i> major storm runoff; water release from failed stormwater dams).	Engineering judgement was applied to identify potential causes of deviations from design intent ( <i>e.g.</i> human error: acts of omission or commission; equipment failure; and external events).
Control evaluation	Actions, activities and processes applied to mitigate the introduction or transport of hazards from catchment to customer tap ( <i>e.g.</i> catchment protection, pre-treatment,	Health and safety risk controls were identified with reference to a control hierarchy which established their relative criticality: engineering ( <i>e.g.</i>	Not observed to have been explicitly undertaken.	The influence of structural and non-structural ( <i>e.g.</i> early warning systems) controls was	Not observed to have been explicitly undertaken.	Systems or procedures designed to prevent, detect, provide early warning, or mitigate the consequences of a

	<p>ozonation) were identified via a checklist-type approach applied to system schematics. Critical controls were identified via set criteria. Technical data, consultations with operators, and site visits informed survey-based evaluations of their adequacy of design, management and operation with reference to key attributes (<i>e.g.</i> infrastructure; planning, procedures and legislation; monitoring; and auditing).</p>	<p>substitution, isolation, design modification, guarding), administrative (<i>e.g.</i> training, supervision, procedures), and personal protective equipment. No explicit provision for evaluating their adequacy of design, management or operation.</p>		<p>incorporated within the modelling of failure scenarios (<i>i.e.</i> within event trees, dam break modelling, <i>etc.</i>).</p>		<p>deviation (<i>i.e.</i> safeguards) were identified. No explicit provision for evaluating their adequacy of design, management or operation.</p>
Consequence evaluation	<p>This may be generalised as the judgement-based interpretation of limited data sets describing the nature and severity of consequences of past hazardous events (<i>e.g.</i> in occupational health and safety: cost of claims, lost time due to incidents) to derive a credible evaluation of the potential consequence(s) of uncertain future events. Evaluations were near uniformly characterised with reference to descriptors of the nature (<i>e.g.</i> environmental, financial) and severity of consequences of events enshrined within the utility's portfolio of risk ranking techniques. However, isolated applications of mathematical modelling (<i>e.g.</i> event tree analysis, dam break modelling, inundation mapping, and economic impact evaluations in major dam risk analysis; event tree analysis in one occupational health and safety risk analysis application) were observed.</p>					
Likelihood evaluation	<p>May be generalised as the judgement-based interpretation of data pertaining to the frequency of past hazardous events (<i>e.g.</i> water quality exceedence frequencies) in light of analyst(s) knowledge, experience, and assumptions. Evaluations were near uniformly characterised with reference to likelihood benchmarks within risk ranking techniques. However, isolated applications of mathematical modelling were observed (<i>e.g.</i> in major dam risk analysis, network reliability analysis, <i>etc.</i>).</p>					
Risk evaluation	<p>Outside of isolated risk analyses driven by consultants (<i>e.g.</i> notional costs of risk and statistical lives lost were derived in major dam risk analysis), risk was expressed in qualitative terms (extreme, high, medium or low) derived by combining estimates of consequence severity and likelihood on a risk matrix.</p>					

1 Table 6 Summary of the undertaking of each risk based decision making practice within the sub-sample

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	Drinking water quality management	Occupational health and safety management	Asset management	Project management
Establish risk acceptance criteria	Corporate policy was to reduce risks to a level “as low as reasonably practicable (ALARP).” The ALARP principle recognises that it would be possible to spend infinite time, effort and money attempting to reduce a risk to zero, and reflects the idea that the benefits of risk reduction should be balanced with the practicality of implementation. However, ALARP was not referred to within individual functions’ risk management procedures, with the exception of OH&S and in major dam safety management. In the latter, risk acceptability considered three criteria: life safety criteria; ALARP, and the <i>de minimis</i> risk concept, in order of stringency.			
Establish criteria for evaluating alternative risk management options	Not explicitly defined. Interviewees referred to cost, time and effort required for implementation; forecast risk reduction; regulatory compliance; risks introduced ( <i>e.g.</i> disinfection by-products); geographical and technical feasibility ( <i>e.g.</i> site constraints); operability; manpower required; and social and political concerns.	Not explicitly defined. Forecast risk reduction, cost of implementation, and technical feasibility were referred to by one interviewee.	Defined for below ground major water mains: qualitative risk reduction, cost of implementation, and latency of effects; for major dams: cost of implementation, and forecast reduction in statistical lives lost and economic losses from dam failure events (weighted to ensure preference for reducing lives lost).	Not explicitly defined. Although project managers were explicitly required to take a cost-benefit approach in evaluating risk management options, the scope of these considerations, <i>i.e.</i> the criteria with which costs and benefits were determined with reference to, was not defined.
Identify risk management options	Options ( <i>e.g.</i> infrastructure upgrades, fencing off sensitive catchments, educating and training operators) were	Options ( <i>e.g.</i> introducing standard work practices) were typically generated in	Options ( <i>e.g.</i> for wastewater treatment plants: capital projects, alterations to operating or maintenance regimes, contingency plans; for dams: structural	Options were typically generated by the project manager in consultation with relevant stakeholders ( <i>e.g.</i> engineering staff, environmental representatives), or

		generated by groups responsible for the risk analysis of each sub-system ( <i>e.g.</i> catchment) in consultation with relevant specialists ( <i>e.g.</i> engineering, operations).	brainstorming sessions involving a broad cross-section of regional / departmental staff, and, where relevant, OH&S staff.	and non structural measures, such as installing external back up seals on concrete faced rockfill dams, or early warning systems, respectively) were generated by those groups responsible for the risk analysis of each asset class in consultation with operating and maintenance staff.	within the risk analysis workshops through group brainstorming. This was informed by predefined measures for: reducing likelihood of occurrence ( <i>e.g.</i> audit and compliance programs, training, preventative maintenance); reducing impact of occurrence ( <i>e.g.</i> contingency planning, engineering and structural barriers, early warning devices); and risk transfer ( <i>e.g.</i> contracts; insurance arrangements).
Evaluate options	The impact of options against individual evaluation criteria	Methods ranged from the application of professional judgement, to the revision of risk analyses ( <i>i.e.</i> to derive the forecast risk reduction), to stakeholder consultations, cost-estimations, and engineering studies ( <i>e.g.</i> feasibility studies in major dam safety management). However, given that in most cases the evaluation criteria were not explicitly defined, the undertaking of this tended towards the informal or implicit.			
	Determining relative merit of options	Largely informal and judgement-based, although the use of formal cost-benefit analysis was observed within asset management's approach to prioritising major dam safety upgrades, whilst cost effectiveness evaluations informed prioritisations of the replacement of below ground major water mains. Furthermore, risk management options that took the form of capital projects valued in excess of approx. \$150,000 (US) underwent formal cost-benefit analysis as part of the capital approval process.			
	The acceptability of risk	The limited application of cost-benefit analysis in the context of evaluating risk management options meant that the determination of risk acceptability was typically judgement-based.			
Managerial review and option(s) selection		Whilst our interviewees referred to peer reviews of varying formality as helping to shape the final option(s) selection across our sub-sample, the data does not allow for a meaningful analysis of the roles of judgement, experience, bias, power structures, <i>etc.</i> in shaping decision outcomes.			