

## UHSP-40 Water Hygiene Policy



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UHSP-40 Water Hygiene	2.3	23/02/2023	23/02/2026

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## 1. Objective

University of Leicester is committed to water hygiene in all relevant work activities and water systems on its estate. The relevant regulations and industry guidance that need to be adhered to are:

- Health and Safety at Work Act 1974
- Control of Substances Hazardous to Health Regulations 2002
- Water Supply (Water Fittings) Regulations 1999
- Legionnaires' disease. The control of legionella bacteria in water systems – HSE ACoP & Guidance L8
- University of Leicester Water Safety Plan (Books 1, 2 & 3 & 4)
- Legionnaires' disease: technical guidance - HSG 274

## 2. Scope

The scope of this policy will cover all water systems within buildings the University has control of without exception. This shall include, but is not limited to the following:

- Domestic cold-water services - storage and distribution
- Domestic hot water services - generation storage and distribution
- Faucets, showers, bib taps, etc.
- Thermostatic mixing valves (TMV) / thermostatic mixing taps (TMT)
- Drinking fountains / water coolers / dispensers / ice machines
- Vending machines
- Irrigation systems
- Fire hose reels (where they are supplied by or share facilities with the domestic water system(s))
- Emergency showers/ eye wash stations
- Horticultural misting systems
- Wet air conditioning
- Portable air conditioning units
- Scientific and other equipment temporarily or permanently connected to the water system (i.e. experimenting / electric plating equipment, test rigs)
- Pressurisation units, water boosters, expansion vessels, water features and other systems considered to pose a risk (i.e. spas, pools, sports facilities, rain towers)

In buildings that we occupy that are owned by the NHS, we would be bound by their water safety policies in addition to our own.

## 3. Definitions

**Water risk assessment:** A risk assessment carried out by a competent person to ascertain the level of water hygiene risk present in a building (or area of a building).

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**Water safety plan:** A written management plan which details how water hygiene risks are to be controlled and managed to ensure water hygiene safety within a building (or area of a building).

**Duty Holder** a position stipulated by the approved code of practice (L8). This person has overall responsibility for ensuring that the organisation fulfils its obligations.

**Delegated Duty Holder:** A person with overall responsibility for equipment requiring statutory examination and test within a College or EDS (AMC). This will typically be the Head of College for academic areas and the Director of Asset Management and Compliance for AMC (who manage the majority of equipment requiring statutory inspection or examination which sit outside of the Colleges). These duties may be delegated further.

**Responsible person:** A person within an operational area who has been assigned management and organisational responsibilities in relation to water hygiene assets and systems. Responsibilities exist throughout the management structure but, at an operational level, this would be a person who controls the use of an outlet and/or equipment. An organogram describing how responsible people are defined can be found in appendix I

**Contractor:** An individual, company or organisation engaged directly by the University or by a company operating from University premises to provide labour and/or services.

**Person in control of works (e.g. project manager, asset manager, RM supervisor, RM technician, principal contractor's site manager, CAT 3 suite manager College/departmental staff):** The person in control of works will be the University's principal point of contact with a maintenance or construction contractor.

**Competent person (water):** A person, organisation or contractor designated by the University to provide competent advice on water hygiene assets, systems and associated documentation. They may also carry out water hygiene-related work (i.e. water risk assessments, flushing of little used outlets, tank inspections and other water safety checks). Different competent persons may be used for different water hygiene-related tasks.

**Ops Competent person:** A person within an operational area (e.g. Department) who has been assigned the responsibility to ensure statutory inspection or examination actually takes place and is appropriately recorded. This will typically be Operations Managers or Technical Services Managers within academic areas and Asset Managers for AMC.

**Authorising Engineer (AE):** A person designated by the University to provide independent advice on water hygiene assets, systems and associated documentation (i.e. water safety plan). The AE is also responsible for providing independent auditing and witnessing of documentation on validation.

## 4. Responsibilities

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**The Vice Chancellor** is the duty holder as defined by the Health and Safety Executive's Approved Code of Practice "L8: Legionnaires' Disease: The control of legionella bacteria in water systems". Those duties are:

- To identify and assess sources of risk
- To prepare a written scheme for preventing or controlling risk
- Implement, manage and monitor precautions
- Keep records of precautions
- Appoint a competent person with sufficient authority and knowledge of the installation to help take the measures needed to comply with the law.

While the duties conferred on the Vice Chancellor by L8 remain theirs, their completion has been delegated to various responsible people as described in the rest of this section.

**Executive Board** will:

- Provide leadership to ensure that these procedures are followed, including the provision of adequate resources

**Director of Asset Management & Compliance** is the delegated duty holder for estates infrastructure and is responsible for:

- Ensuring that this policy is implemented within Estates-controlled water infrastructure
- Ensuring that all employees under their control are made aware of this policy and any responsibilities they have therein
- Appointing a responsible person for water hygiene to cover all water systems under Estates & Digital Services control
- Ensuring that legionella risk assessments for the estate are undertaken and that any actions and recommendations are undertaken (where actions or recommendations are required to be managed by departments, they will ensure that these details are passed to the relevant department to undertake)
- Where practicable (and where supported by advice by the University's appointed water hygiene Authorised Engineer (AE), removing or draining down all redundant water outlets and associated pipework
- Preventing the use of any water-cooling towers (i.e. by ensuring they are removed from any property as soon as possible after acquisition by the University)
- Responding appropriately to any outbreak of legionnaires disease attributable to the University
- Ensuring that a water safety plan is in place and maintained
- Attend the University's Water Safety Group meetings

**Heads of College**

- Act as the delegated duty holder for their area of responsibility
- Appoint a responsible person to discharge their duties
- Ensure water hygiene tasks are completed

**College Directors of Operations, Heads of Schools, Departments or Corporate Service Divisions** are the responsible persons for the areas under their control and are responsible for managing and controlling legionella risks within, starting at the outlet and this extending to any equipment connected to outlets or that contains water. They will ensure that arrangements are in place to:

- Ensure that this policy is implemented in their area of responsibility

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- Appoint in writing an operational responsible person (or persons) in order to manage agreed water hygiene activities relating to equipment or plant in their area or under their day-to-day control.
- Provide sufficient time and resources for the operational responsible person to discharge their duties and cooperate fully with the water hygiene Authorising Engineer and the Estates & Digital Services water hygiene responsible person
- Ensure all responsible persons (and other staff engaged in water hygiene-related tasks) are provided with suitable training and instruction to enable them to discharge their duties
- (In collaboration with the relevant Health and Safety Business Partner) Identify little-used outlets in their area of control and ensure these outlets are flushed weekly in accordance with the University's water safety plan and recorded on ZetaSafe. NB – the list of little used outlets must be maintained to reflect changing usage requirements
- Notify the Estates & Digital Services water hygiene responsible person of any little-used or redundant outlets or pipework **AND** any unoccupied buildings (or areas of buildings) under their control so that relevant actions can be taken to reduce the water hygiene risks
- Ensure that no equipment is connected to water outlets without approval being granted from the Estates & Digital Services water hygiene responsible person
- Attend the University's Water Safety Group meetings

#### **Estates & Digital Services water hygiene responsible person:**

Has a key role to play in operational duties and day-to-day management of water hygiene assets controlled by Estates & Digital Services. To this end, they will be responsible for:

- Appointing a suitably competent person (or organisation) to carry out water risk assessments on Estates buildings and for subsequent reviews as required
- Making schools and departments aware of the content of the relevant water risk assessments and notifying them of any actions arising which are outside of the scope of Estates and Campus Services
- Appointing and arranging for competent persons to carry out water-hygiene related tasks as required by the water risk assessment and water safety plan
- Liaising with school and departmental staff and competent persons as required to facilitate and manage water hygiene tasks and risk assessments as well as close out of arising remedial actions (where required)
- Maintaining the University's water hygiene compliance portal (ZetaSafe) and escalating any water hygiene non-conformances or incidents to the Director of Asset Management & Compliance without delay
- Liaise with the Director of Asset Management & Compliance, the Director of Health and Safety Services and the water hygiene Authorising Engineer regarding contact with external enforcement agencies
- Attend the University's Water Safety Group meetings
- Ensure infrequently used outlets not under the Colleges' control are regularly flushed. This includes WorkSmart shared spaces.

#### **School or Departmental Competent Persons**

To be nominated by the College/Department Responsible Person to assist with managing and controlling water hygiene risks from the point of outlet within their areas of control and to this end are responsible for:

- Assisting the Estates & Digital Services water hygiene responsible person in fulfilling their duties in areas not under direct estates control (refer to water safety plan for guidance)
- Allowing reasonable access to enable the risk assessment and any remedial works to take place

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- Keeping under review the frequency of use of assets in areas under their control, and where assets become little used (less than once per week), putting in place an appropriate flushing regime in accordance with the provisions of the water safety plan
- Ensuring that they do not arrange repair, maintenance or alteration works (including connections or disconnections of equipment etc.) to Estates controlled water infrastructure or make changes (including operational changes) that could potentially impact water hygiene
- Notifying any individuals(s) who will be responsible for completing the routine water hygiene tasks and checks on the premises, (i.e. weekly flushing tasks) to the Estates & Digital Services water hygiene responsible person (or their deputy)
- Ensuring that regular maintenance of showers and water systems in areas of their control are undertaken where required and recording results in ZetaSafe. This may include running showers for a set time, and running little used taps, WCs and water sources (all in accordance with the water safety plan)
- Reporting any concerns such as obviously inappropriate temperatures to the Estates & Digital Services water hygiene responsible person without delay and ensuring they are followed up
- Reporting any damage, deterioration or changes in the use of the building, water systems and/or air conditioning plant within their area of operational responsibility to the Estates & Digital Services water hygiene responsible person
- Ensuring any modifications to hot or cold-water systems are only carried out after approval by the Estates & Digital Services water hygiene responsible person
- Raise and observe the requirements of water hygiene permits to work in accordance with the water safety plan
- Ensure that any recommendations arising from the legionella risk assessment which are the responsibility of the department are carried out as required

**Persons in control of works** (mostly EDS Project Managers) are involved in the selection of equipment or systems when new systems are specified, or existing systems are redesigned or modified as part of a refurbishment programme. Persons in control of works must:

- Ensure that design specifications detailed within the University water safety plan and associated documents are communicated to those responsible for installation and maintenance of water systems
- Ensure that contractors are made aware of the importance of following the water safety plan (specifically, water sampling)
- Ensure that any concerns relating to system design (i.e. water safety plan derogation requests) are communicated without delay to the Estates & Digital Services water hygiene responsible person (or in their absence) to the Authorising Engineer
- Ensure any derogations from the water safety plan are authorised by the Estates & Digital Services water hygiene responsible person (or in their absence) by the Authorising Engineer in advance using the relevant form from the water safety plan
- Ensure that any alterations to the existing water infrastructure (i.e. after refurbishment of a space) are notified to the Estates & Digital Services water hygiene responsible person (or in their absence) to the Authorising Engineer
- Ensure any permits or forms required by the water safety plan and University permit system are raised, completed and closed out as required

### Space Management

The University Space Management Department is responsible for reporting to the Estates & Digital Services water hygiene responsible person any change of use or vacation of premises that they are aware of to ensure that water hygiene is appropriately managed.

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### Health and Safety Services:

Health and Safety services is responsible for the following:

- Advising on matters relating to water hygiene, including any changes in legislation and how these impact on the University activities
- Reviewing the effectiveness of this policy and advising on changes
- Chairing the water safety group and liaising with key stakeholders as required
- Liaising with the water hygiene responsible/competent persons and the Authorising Engineer to ensure successful implementation of this policy

**The competent person** (normally a third party contracted to provide this service) is responsible for carrying out preventative and reactive maintenance on water hygiene-related assets and for carrying out remedial measures when instructed to do so. The competent person will:

- Carry out water hygiene services on behalf of the University following instruction from the Estates & Digital Services water hygiene responsible person
- If the equipment is safe for use, suitably mark the equipment (if appropriate) allowing its use or continued use, (they may recommend non-critical repairs); or,
- If the equipment is not considered safe for use, issue a notice prohibiting its use. Details as to the reasons why the use has been prohibited will be provided to the Estates & Digital Services water hygiene responsible person or delegated deputy on the day of inspection together with details of work required to make the equipment safe (remedial work to be carried out by the appropriate party which may be within the department)

## 5. Procedure

Detailed processes can be found in the water safety plan but the actions required of the schools and departments can be summarised as follows:

1. Identify individuals within the School or Department to fulfil the roles required by this policy, i.e. an Operational Responsible person and a sufficient number of School Competent Persons
2. Ensure all persons with water safety roles receive appropriate training
3. (In collaboration with the relevant Health and Safety Business Partner) Identify little-used outlets in their area of control. NB – the list of little used outlets must be maintained to reflect changing usage requirements
4. Arrange for unwanted little used outlets to be removed by contacting ECS Service Desk
5. Carry out weekly flushing of remaining little used outlets and record in a manner agreed with EDS

## 6. Related documents

- The Chartered Institution of Building Services Engineers TM13 2002 COP Minimising the Risk of Legionellosis
- British Standard Specification for design, installation and maintenance of services supplying water for domestic use within buildings and their curtilages
- "Safe" Hot Water and Surface Temperatures – Health Guidance Note 1998
- Legionnaires' disease. The control of legionella bacteria in water systems – HSE ACOP & Guidance L8

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## 7. Revision History

Date of Issue	Version	Reviewer	Amendments Made
31/01/2020	1.0	Dr Christopher Bruce & Matt Taylor	First issue
08/01/2021	2.1	Miki Brocklehurst	Significant amendments clarifying structure, responsibilities and procedure
28/08/21	2.2	Miki Brocklehurst	4. Responsibility – EDS competent personnel: added a bullet point re: WorkSmart areas`
22/02/2023	2.3	Matt Taylor	Definitions of roles and duties updated to match those in other policies plus minor changes throughout

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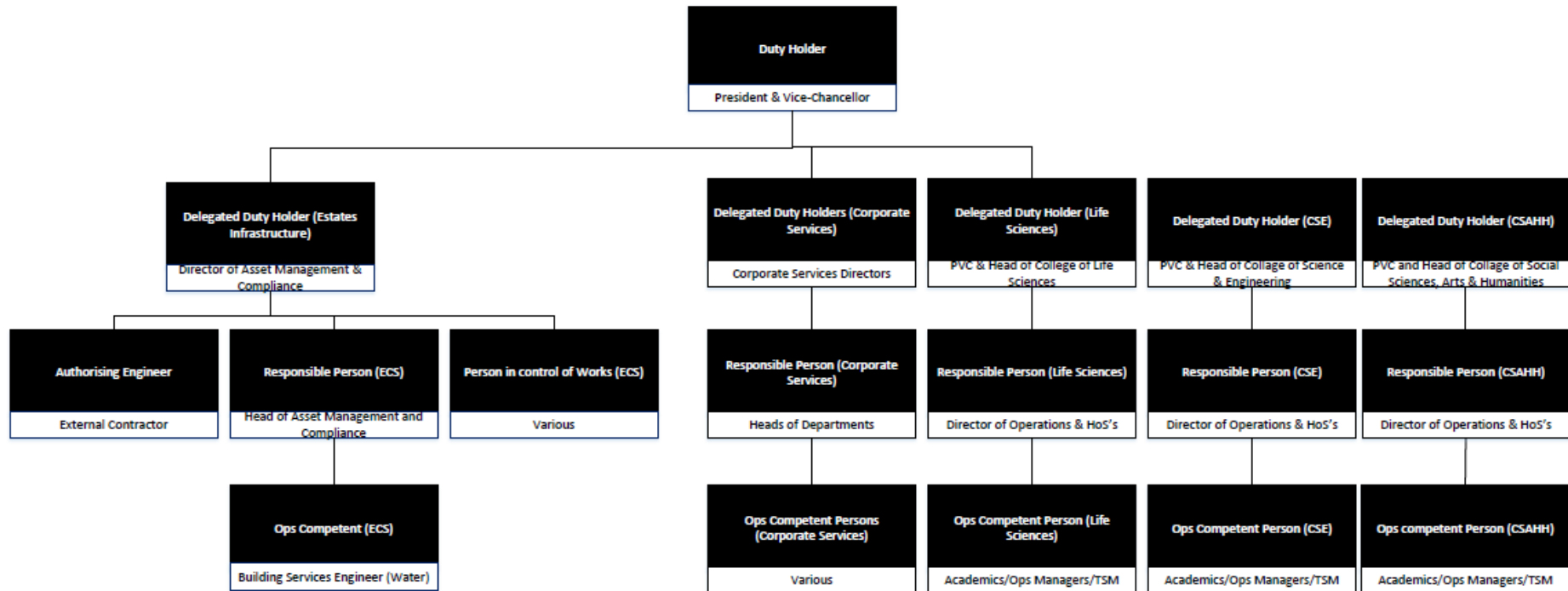
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## Appendix I: Organogram

Water Safety Responsibility Organogram



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