

Livewell Southwest

## **Water Management Policy**

Version No.1

Review: April 2017

### **Notice to staff using a paper copy of this guidance**

**The policies and procedures page of Intranet holds the most recent version of this guidance. Staff must ensure they are using the most recent guidance.**

**Author: Responsible Person Water Safety and Head of Health, Safety and Security**

**Asset Number: 864**

## Reader Information and Asset Registration

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<b>Author</b>	Responsible Person Water Safety and Head of Health, Safety and Security
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<b>References/sources of information</b>	The following is a list of other policies, procedural documents or guidance documents (internal or external) which staff should refer to for further details:  Health and Safety at Work etc. Act 1974. <a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>  The Management of Health and Safety at Work Regulations 1999. <a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>  Health and Safety Executive's Approved Code of Practice

	<p>(ACOP) &amp; Guidance L8, The control of legionella bacteria in water systems (referred to hereafter as L8). <a href="http://www.hse.gov.uk">www.hse.gov.uk</a></p> <p>Health Technical Memorandum 04-01: The control of <i>Legionella</i>, hygiene, “safe” hot water, cold water and drinking water systems. Part A: Design, installation and testing; Part B: Operational Management. <a href="http://www.gov.uk">www.gov.uk</a>.</p> <p>Health Technical Memorandum 04-01: Addendum - Pseudomonas Aeruginosa – advice for augmented care units. <a href="http://www.gov.uk">www.gov.uk</a></p> <p>Control of Substances Hazardous to Health (COSHH) Regulations 2002. <a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a></p> <p>Public Health (Infectious Diseases) Regulations 1988. <a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a></p> <p>Water Supply (Water Quality) Regulations 2010. <a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a></p> <p>Food Safety Act 1990. <a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>.</p> <p>Water Supply (Water Fittings) Regulations 2009. <a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a></p> <p>British Standards BS6700:1997 Water Supply services. <a href="http://www.bsigroup.co.uk">www.bsigroup.co.uk</a></p> <p>British Standards BS1710:1984 Identification of pipelines and services. <a href="http://www.bsigroup.co.uk">www.bsigroup.co.uk</a></p> <p>Health Technical Memorandum 03: Heating and Ventilation Systems. <a href="http://www.gov.uk">www.gov.uk</a></p> <p>CIBSE TM13: Minimising the risk of Legionnaires’ disease 2013. <a href="http://www.cibse.org">www.cibse.org</a></p> <p>BSRIA’s FMS 4/99: ‘Guidance and the standard specification for water services risk assessment’ 1999. <a href="http://www.bsria.co.uk">www.bsria.co.uk</a></p> <p>Water UK: National Guidance for Healthcare Waste Water Discharges, April 2011. <a href="http://www.water.org.uk">www.water.org.uk</a></p> <p>Legionella Control Association’s Code of Conduct. <a href="http://www.legionellacontrol.org.uk">www.legionellacontrol.org.uk</a></p>
<b>Associated documentation</b>	<p>Health and Safety Policy Infection Prevention and Control Policy LSW Water Safety Plan</p>
<b>Supersedes document</b>	<p>New policy</p>
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## Document review history

Version no.	Type of change	Date	Originator of change	Description of change
0.1	New Policy	June 2014	Responsible Person Water Safety and Head of Health, Safety and Security	New Policy
V.1.	Ratified	January 2015	Policy Ratification Group	Ratified

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# Water Management Policy

## 1. Introduction

- 1.1 Livewell Southwest (LSW) recognises the vital importance of operating safe water services and providing adequate measures for the control of bacteria, to maintain the safety and welfare of patients, employees, visitors and contractors on LSW premises and other premises from/for which LSW provides services. This document sets out LSW's Policy for the control and safety of water hygiene.
- 1.2 In addition, this policy provides specific guidance for LSW staff and others regarding water management and promotes a consistent approach to water safety.

## 2. Purpose of the Document

- 2.1 The purpose of this document is to set out how LSW will control the safety and quality of its water and water systems.

## 3. Glossary/Definitions

The following terms and acronyms are used within the document:

Control Scheme	The maintenance plans and procedures devised to eliminate or adequately control the risk of an outbreak of legionella, pseudomonas aeruginosa or other contamination.
FM Provider	The in-house or external party responsible for the day to day management of legionella, etc.
HTM	Health Technical Memorandum.
IP&C	Infection Prevention & Control.
Legionella	The term legionella used in this document may also be construed generically to include other water borne bacteria e.g. pseudomonas aeruginosa, cryptosporidium.
LIFT	Local Improvement Finance Trust.
PPM	Planned Preventative Maintenance.
Service Provider	External contractor providing expertise in water hygiene activities, including water sampling.
LSW	Livewell Southwest
Water Safety Plan	A risk-management approach to the microbiological safety of water that establishes good practices in local water distribution and supply. It will identify potential microbiological hazards caused by opportunistic pathogens, consider practical aspects, and detail appropriate control measures.

## 4. Scope

- 4.1 The policy applies to all wards, departments, services and healthcare staff under the remit of LSW, wherever they may work.
- 4.2 In addition, the policy covers all the sites where LSW has operational responsibilities for water management, which includes owned, leased and LIFT properties. Where

LSW has a minority stake in, or has contracted out the operational responsibilities to another organisation, then the policy of that organisation may apply, notwithstanding the duty of LSW to ensure that their policy is suitable & sufficient and is being effectively managed and delivered.

4.3 Where, for example, LIFT arrangements mean that specific duties & responsibilities are delegated to other parties these must be clearly detailed in the relevant Water Safety Plan, Control Scheme and or Risk Assessment documentation for that particular property / water system.

4.4 This policy also makes reference to discharges into the sewerage system.

#### **a. Regulatory Position**

- Primary compliance rests with the Health and Safety at Work etc. Act (Ref 4);
- Management of Health and Safety at Work Regulations (Ref 5);
- Health & Safety Code of Practice L8 (Ref 3) and HTM 04-01 (Ref 1 & 2).

## **5. Main Policy Content Details**

To comply with L8 (Ref 3) and HTM 04-01 (Ref 1) in respect of the control of legionella LSW is to ensure, via its contract monitoring arrangements if applicable, that the arrangements outlined in section 6 to 10 below are implemented to address any risks posed by legionella contamination.

## **6. Aims & Objectives**

6.1 In order for LSW to provide safe and hygienic water it must:

- Comply with the requirements of The Health and Safety Executive's Approved Code of Practice & Guidance 'The control of legionella bacteria in water systems' L8 (ref 3).
- Comply with the Health Technical Memorandum (HTM) 04-01 - the control of legionella, hygiene, 'safe' hot water, cold water and drinking water systems (ref 1).
- Comply with Health Technical Memorandum 04-01 Addendum - Pseudomonas aeruginosa – advice for augmented care units (ref 2), and all other documentation in References/Source section in reader sheet.
- Work in close co-operation with LSW's LIFT Partner and other supply chains, their sub-contractors, other health organisations, service providers and private health care providers to meet these aims and objectives in the control of water hygiene & safety.
- Ensure that any systems at risk from legionella, pseudomonas aeruginosa or other contamination are identified, recorded, risk assessed/actioned and regularly reviewed.
- Maintenance plans and procedures are prepared, implemented, managed and monitored (the Control Scheme) so as to eliminate or adequately control the risk of an outbreak of legionella, pseudomonas aeruginosa or other contamination.
- Ensure that new and refurbished water systems are designed, installed and commissioned in line with L8 (ref 3), HTM 04-01 (ref 1 & 2) and current best

practice guidance to eliminate or adequately control the risk of legionella, pseudomonas aeruginosa or other contamination.

- Maintain water management records for all premises.
- Ensure appropriate action is taken in the event of a waterborne outbreak or suspected outbreak, e.g. Legionnaires Disease.
- Arrange for the provision of 'Independent Audits'\* of the water management and control measures for LSW.
- Ensure those persons appointed to carry out the control measures and strategies are suitably qualified, instructed and trained and their suitability assessed.
- Only appoint Service Providers who subscribe to the Legionella Control Association's Code of Conduct (ref 19).

6.2 \*Note: LSW has outsourced the estates function at some of its premises to a LIFT provider. LSW is aware it cannot delegate its accountability through its contractual arrangements therefore it will undertake due diligence checks on its external FM Provider's services as an extra control measure over and above the contractual arrangements that assign duties of L8 and HTM compliance to these organisations.

### **6.3. Risk Assessments**

6.3.1 The Responsible Person (Water) (see Section 11.7) is to ensure that suitable and sufficient Risk Assessments are in place (and reviewed as and when appropriate) to:

- Assess the risk of exposure to legionella bacteria;
- Ensure that a current Water Safety Plan is in place which is compliant with the elements detailed within section 9.
- Ensure that relevant information has been provided to enable the FM Provider to review its risk assessments.

6.3.2 Risk assessments are to be undertaken by competent persons, typically as delegated by the providers' supply chains. The Risk Assessments are to be in line with the requirements of the L8 (ref 3) and guidance given in BSRIA's FMS 4/99 (ref 17). It must include identification and evaluation of the potential sources of risk and:

- The particular means by which exposure to legionella bacteria is to be prevented;  
**or**
- If prevention is not reasonably practicable, the particular means by which the risk from exposure to legionella bacteria is to be controlled.

6.3.3 Risk Assessments are to be reviewed regularly by the Responsible Person (Water) and in any case whenever there is reason to believe that the original assessment may be no longer valid. Action plans must be put in place and actioned by LSW, the FM Provider and their supply chains and progress and plans reported to the Water Management Group, with all concerns or expectations raised for discussion.

## **6.4 Control Measures**

6.4.1 Where the Risk Assessments identify there is a reasonably foreseeable risk and a potential for exposure to legionella (including positive water samples), adequate control measures shall be implemented to ideally prevent or minimise exposure risks.

## **6.5 The Control Measures are to generally include the following:**

- Controlling the release of water spray in so far as this is possible.
- Avoidance of water temperatures and any condition that favour proliferation of legionella bacteria in so far as this is within the control of the FM Provider and based on information provided by LSW on how the services provided are used.
- The identification and reporting of little used outlets to enable appropriate controls to be put in place.
- Avoidance of water stagnation in so far as this is within the control of the FM Provider and based on information provided by LSW on how the services provided are used.
- Avoidance (so far as is reasonably practicable) of the use of materials that harbour bacteria and other micro-organisms or provide nutrients for microbial growth.
- Maintenance of the cleanliness of systems and the water in them.
- The use of water treatment techniques as appropriate and in accordance with the Water Safety Plan.
- Water sampling procedures for water quality assurance in accordance with the Water Safety Plan.
- Water system flushing procedures in accordance with the Control Scheme and risk assessments.
- Action to ensure the correct and safe operation and maintenance of the water system and plant in accordance with the Control Scheme.

6.5.1 Adequate procedures are to be set in place by LSW and all its FM Providers, to regularly monitor and review the efficacy of the Control Scheme.

## **7. Design and Installation of Systems**

7.1 The design and installation of systems are to be in accordance with current good engineering practice and in particular the documents listed in References/Source section in reader sheet.

7.2 LSW Estates Manager and LSW's LIFT Partner and all other FM Providers, as appropriate, will ensure that these requirements are detailed in any specifications for the design and installation of any new or refurbished systems and that only suitably qualified and experienced persons are appointed to design, install, commission, test and maintain such systems.

## **8. Operational Management & Maintenance Procedures**

8.1 Procedures are to be set in place for the 'Operational Management and Maintenance' of all systems at risk from legionella contamination. The procedures are to be regularly reviewed and updated as appropriate.

8.2 The operational management and maintenance of water systems will be in accordance with current good engineering practice and in particular the documents

listed in References/Source section in reader sheet. This is detailed in the Water Safety Plan.

- 8.3 Where there may be variances in any guidance documents, associated with operational management, standards, monitoring and / or maintenance frequencies, the more detailed healthcare specific guidance contained within the HTM's shall be applied.

## **9. Water Safety Plan**

9.1 The Water Safety Plan will include the following elements:

- System assessment.
- Operational monitoring arrangements.
- Operational Management and communication arrangements.
- Recording, Feedback and further controls required.

9.2 Maintenance control measures must be in the form of PPM Work Instructions and must be prepared for each system or item of plant where there is a reasonably foreseeable risk and a potential for exposure to legionella.

9.3 Maintenance control measures must form part of the PPM Regime and Records System for the control of legionella and be in line with the guidance given in L8 (ref 3) and HTM 04-01 (ref 1 & 2), HTM 03 (ref 14) and TM 13 (ref 15).

9.4 Maintenance control measures must be prepared by a suitably qualified person or persons to include appropriate Check Sheets for record purposes.

9.5 Water Safety Plan must be regularly reviewed by the Responsible Person (Water) and updated accordingly.

9.6 There shall be a clearly defined Reporting and Checking Process to provide an Audit Trail for all requirements of the Water Safety Plan.

## **10. Waste Water Discharges**

10.1 Discharges from Healthcare Establishments containing non-domestic waste water constitute 'trade effluent' and such discharges are regulated by the UK's twelve Sewerage Undertakers in their respective geographical regions.

10.2 Departmental use of water and its discharge into the drainage & sewerage system(s) are to be reviewed by the Responsible Person (Water) in line with the guidance contained in Water UK's 'National Guidance for Healthcare Waste Water Discharges' to ensure all applicable conditions and limits are adhered to.

## **11. Duties and Responsibilities of Individuals and Groups**

### **11.1 Responsibilities**

11.1.1 The management structure and lines of communication will vary slightly depending on the contractual arrangements specific to the property to which it relates and the parties involved. Clearly defined lines of responsibility must be documented for each contract

type. In some cases, these responsibilities may be delegated contractually to parties outside of LSW. The terms below are to apply in all cases.

## **11.2 Collective Responsibilities**

- 11.2.1 LSW and all other relevant parties have statutory responsibilities to ensure the provision of wholesome, safe, hot and cold water supplies and storage & distribution systems. Each party has the responsibility to develop, implement, manage and monitor Policies and Procedures reflecting their respective responsibilities as statutory duty holders.
- 11.2.2 All LSW staff and staff working directly or indirectly for LSW's LIFT Partner together with any contractors appointed by any party are responsible for co-operating with the operational requirements of this Policy.
- 11.2.3 Current statutory legislation requires both 'management' and 'staff' to be aware of their individual and collective responsibility for the provision of wholesome, safe hot and cold water supplies, storage and distribution systems in healthcare premises.

## **11.3 Designated Group & Staff Functions**

### **LSW Board**

- 11.3.1 LSW Board has a responsibility to conform to the statutory requirements listed in Table 1 and all other associated Regulations in the control of hygienic and safe water systems.
- 11.3.2 LSW has responsibility to issue a General Statement of Policy (i.e. this document) and it will expect management and staff to comply with this Statement and with the Acts and Regulations relating to the control of water hygiene and safety. LSW will seek to minimise the incidence of all workplace risks and must provide sufficient resources for this to be effective.

## **11.4 Chief Executive**

LSW Board, through the Chief Executive, has overall responsibility for Health and Safety.

## **11.5 Duty Holder**

The Duty Holder is the person or organisation on whom the above regulations impose a legal duty in connection with water hygiene and safety. For LSW, this is the Chief Executive.

## **11.6 Management**

Management is defined in HTM 04 (Ref 1) as the General Manager, Chief Executive or other person who is ultimately accountable, and on whom the duty falls, for the safe operation of healthcare premises.

## **11.7 Responsible Person (Water) (also known as RP)**

The RP must be appointed in writing by management and will be responsible for devising and managing the necessary procedures to ensure that the quality and safety of water is maintained. For LSW, this is the Mechanical and Electrical Operations Manager.

### **11.8 Deputy Responsible Person**

A deputy to the relevant Responsible Person, appointed in writing by management For LSW, this is the Planned Maintenance Supervisor.

### **11.9 Consultant Microbiologist**

The Consultant Microbiologist will provide specialist Microbiological knowledge and expertise to the RP (and others) to ensure that the quality and safety of water is maintained.

### **11.10 Director of Infection Prevention and Control (DIPC)**

The DIPC will ensure that specialist Infection Prevention & Control knowledge and expertise is provided to the RP (and others) to ensure that the quality and safety of water is maintained.

### **11.11 All Staff**

All staff are to comply with this policy and associated Water Safety Plans. Where there are any areas within LSW that are affected by actions to repair or manage the water supply staff are to comply with and have a duty to follow any instructions as provided at the time.

### **11.12 Group Functions**

### **11.13 The Safety, Quality and Performance Committee**

The Safety, Quality and Performance Committee will be responsible for monitoring the effective implementation and periodic review of this Policy. This will be on the advice of the Water Management Group.

### **11.14 Water Management Group**

The Water Management Group is chaired by the DIPC. It will have the following membership:

- Responsible Person (Water) RP.
- Consultant Microbiologist.
- Infection Prevention and Control Nurse Specialist.
- Health, Safety and Security Management Advisor.
- Resound Health RP.
- Estates Manager.
- Kiers FM.

Other co-opted persons as deemed appropriate and as nominated by the Chair of the Water Management Group.

The Water Management Group will take place bi-monthly; minutes must be taken as part of this meeting and be convened by the Chair.

Terms of Reference are available.

## 12 Education and Training Requirements

### 12.1 Training

12.1.1 All staff must be trained to a level commensurate with their role and responsibilities. Section 12.1 details the levels of training requirements deemed appropriate to staff roles.

12.1.2 All staff involved in the management and operation of water systems must be trained by a 'Competent Person' to carry out their duties and responsibilities.

12.1.3 Training requirements must be regularly assessed by the Water Safety Group.

12.1.4 Any contractors involved in the installation, commissioning, modification or maintenance of water systems or plant shall be fully conversant with LSW's Water Management Policy, suitably qualified and trained.

12.1.5 The training should include the following aspects as appropriate:

- Statutory Requirements and Codes of Practice.
- Legionella Risk Assessments.
- Water Safety Plan.
- Water Hygiene Requirements.
- Water Regulations.
- Risk Assessment of Water Systems and Plant.
- PPM Procedures, Check Sheets and Documentation.

### 12.2 Education and Training Plan

Education and training plan	Resources	Responsibility	Date / Frequency
Responsible Person (Water)	Approved external training	Chief Executive	Annually
Water Management Group Members	Approved external training	DIPC	Annually reviewed
LSW Registered Building Managers (Locality Managers)	Approved external training	Director of Operations	Annually reviewed

<b>Education and training plan</b>	<b>Resources</b>	<b>Responsibility</b>	<b>Date / Frequency</b>
Competently trained Estates staff to implement operational maintenance controls	Approved external & in-house training courses	Responsible Person (Water)	Annually
All LSW staff	LSW Induction	IP&C	One off
All LSW staff	Mandatory update	IP&C	As per Training needs analysis

### 13 Monitoring Compliance and Effectiveness

The arrangements for monitoring compliance are outlined in the table below: -

<b>Measurable policy objectives</b>	<b>Monitoring / audit method</b>	<b>Monitoring responsibility (individual / group /committee)</b>	<b>Frequency of monitoring</b>	<b>Reporting arrangements (committee / group to which monitoring results are presented)</b>	<b>What action will be taken if gaps are identified?</b>
Review & sign off of Service Records.	Review of Log Book	Responsible Person (Water)	Monthly	Water Management Group	Added to WMG Action Tracker
Review & sign off of Water Safety Plan	Review of Water Safety Plan	Responsible Person (Water)	Quarterly	Water Management Group	Added to WMG Action Tracker
Incident Monitoring	Monitoring of incident reports	Responsible Person (Water)	Bi-monthly	Water Management Group	Added to WMG Action Tracker
Training record monitoring	ESR training records reflecting PDP requirements for staff	Service Managers	Annually	Safety, Quality and Performance Committee	Locality Manager actions
Specialist Training record monitoring (Estates)	Review of training matrix	Responsible Person (Water)	Annually	Water Management Group	Added to WMG Action Tracker to Estates Manager

<b>Measurable policy objectives</b>	<b>Monitoring / audit method</b>	<b>Monitoring responsibility</b> (individual / group /committee)	<b>Frequency of monitoring</b>	<b>Reporting arrangements</b> (committee / group to which monitoring results are presented)	<b>What action will be taken if gaps are identified?</b>
Specialist Training record monitoring (WMG and Building Managers)	Review of training provision at WMG. ESR Records to reflect training provided	DIPC and Director of Operations	Annually	Water Management Group	Added to WMG Action Tracker

**All policies are required to be electronically signed by the Lead Director. Proof of the e-signature is stored in the policies database.**

**The Lead Director approves this document and any attached appendices. For operational policies this will be the Locality Manager.**

**The Executive signature is subject to the understanding that the policy owner has followed the organisation process for policy Ratification.**

Signed: Chief Executive

Date: 9<sup>th</sup> April 2015