

WATER MANAGEMENT POLICY (F-015)

Version Number:	1.5
Author (name & job title)	Steven Leeman – Estates Operations Manager
Executive Lead (name & job title):	Peter Beckwith – Director of Finance
Name of approving body:	Health and Safety Group
Date full policy approved:	24 June 2016
Date Ratified at Trust Board:	June 2016
Next Full Review date:	November 2025

<i>Minor amendments made prior to full review date above (see appended document control sheet for details)</i>	
<i>Date approved by Lead Director:</i>	<i>HAIG – 29 November 2022</i>
<i>Date EMT as approving body notified for information:</i>	<i>November 2022</i>

Policies should be accessed via the Trust intranet to ensure the current version is used

Contents

1. INTRODUCTION	3
2. SCOPE	4
3. DEFINITIONS	4
4. DUTIES AND RESPONSIBILITIES.....	5
5. PROCEDURES RELATING TO THE POLICY	13
6. CONSULTATION.....	14
7. IMPLEMENTATION AND MONITORING.....	14
8. TRAINING AND SUPPORT	14
9. REFERENCE TO ANY SUPPORTING DOCUMENTS	15
10. MONITORING COMPLIANCE.....	16
APPENDIX 1: DOCUMENT CONTROL SHEET	17
APPENDIX 2: EQUALITY IMPACT ASSESSMENT (EIA).....	18

1. INTRODUCTION

Legionnaires Disease

Legionnaire's disease is a potentially fatal form of pneumonia which can affect anybody, but which principally affects those who are susceptible because of age, illness, immunosuppressant, smoking etc. The disease is caused by the bacterium legionella pneumophila and related bacteria. The collective term used to cover the group of diseases caused by legionella bacteria is legionellosis.

On average there are approximately 200-250 reported cases of Legionnaires disease each year in the UK. Infections which originate in the UK are often sporadic outbreaks associated with hot and cold-water systems in factories, hotels, hospitals and other establishments.

Legionella bacteria is ubiquitous, surviving and multiplying in water. Airborne dispersal may occur when water droplets are created. It is likely that all open water systems including those in building services will always have low concentrations present. Water temperature between 20°C and 45°C is the range in which Legionella will proliferate most rapidly. Legionella bacteria is killed within two minutes at water temperatures above 60°C.

Pseudomonas Aeruginosa is a bacterium that is commonly found in many areas but, unlike Legionella, it will survive out of water. The contamination normally associated with water systems does not normally come from within the water supply. The contamination comes from external sources and enters the water pipework through the contamination of tap outlets.

Legislation and Guidance

Duties under the Health and Safety at Work Act 1974 extend to risks from Legionella arising from work activities. In addition, all harmful microorganisms are subject to the Control of Substances Hazardous to Health Regulations 2002 (COSHH), and accordingly, require an assessment, to prevent, or adequately control exposure under these regulations.

This is particularly relevant to persons cleaning or maintaining systems where Legionella may be present, and when the exposure to risk is increased.

COSHH requires that the risks to others be considered "so far as is reasonably practicable". This would include:

- Persons who work in an environment controlled by an air conditioning system or in premises served by a hot and cold-water system
- Persons (including members of the public) who might be exposed to emissions from wet cooling towers, or evaporative condensers
- Persons who might be exposed to aerosols which might contain viable organisms e.g., showers

The Control of Legionella Bacteria In Water Systems (L8) Approved Code of Practice (ACOP) was issued by the Health and Safety Executive (HSE) in 2013. The ACOP provides a basic framework for preventing further outbreaks of the disease, giving advice on the requirements of Health and Safety at Work Act 1974.

It places responsibility on employers and others to:

- Identify and assess risks of Legionellosis
- Avoid the use of systems that give rise to a reasonably foreseeable risk of legionellosis or, where this is not reasonably practicable, prepare a written scheme for minimising the risk from exposure
- Implement and manage the scheme of precautions including the appointment of a person, or persons, to take managerial responsibility and to provide supervision
- Keep appropriate records

2. SCOPE

This Policy applies to all Humber Teaching NHS Foundation Trust premises whether owned or occupied by the Trust under lease, license or other Service Level Agreement (SLA).

Where the management of buildings/areas occupied by Trust staff and/or patients is carried out by others, the requirements of this policy remain applicable although implementation of the site-specific risk management requirements is managed by local policies. It remains; therefore, the Trust's responsibility by the Director of Finance, to ensure that the requirements of this policy are notified to and complied with by all other parties described above.

3. DEFINITIONS

ACoP	Approved Code of Practice
BS	British Standard
DoH	Department of Health
H&S	Health and Safety
HSE	Health & Safety Executive
HSG	Health & Safety Guidance
HTM	Health Technical Memorandum
IPCT	Infection Prevention and Control Team
IT	Information Technology
NHS	National Health Service
SOP	Standard Operating Procedure
UK	United Kingdom
WSMG	Water Safety Management Group
WSP	Water Safety Plan

4. DUTIES AND RESPONSIBILITIES

Organisational Responsibility

All employees of the Trust are responsible for complying with the Trust's policy for safe water management, including the implementation of local management controls. In order to comply with this policy, all staff must be aware of the lines of communication and levels of responsibility, which exist to ensure that all matters of safe water management are dealt with effectively.

Chief Executive

The Chief Executive has overall responsibility and is ultimately accountable for all matters relating to safe water management and upon whom the statutory duty falls to ensure safe, reliable hot and cold-water supply, storage and distribution systems operate within the Trust. The Chief Executive is responsible for ensuring that all safe water management matters are seen as an important priority for the Trust and addressed through comprehensive policies and procedures that are effectively implemented and appropriately resourced within the overall financial position of the Trust.

The Chief Executive will ensure that suitable and adequate resources are made available to support this policy, including training requirements for those undertaking formal roles.

The role of the Duty Holder has been delegated to the Director of Finance, Infrastructure and Informatics. Although the role of the Duty Holder has been delegated, the overall accountability remains with the Chief Executive.

Designated Person [Director of Finance]

The Director of Finance (Designated Person) has designated responsibility for water systems and is responsible for ensuring that the aims and objectives of the Trust's Water Management policy are implemented.

The Director of Finance is the essential link between the Board and the professional support teams and will publicly endorse the Trust's Water Management Policy, ensure adequate resource is available to deliver the policy and empower staff to take the necessary actions. The Director of Finance, in conjunction with the Chief Executive, will ensure that suitable and adequate resources are made available to support this policy, including training requirements for those undertaking formal roles.

By accepting the responsibilities of 'Designated Person (Water)' in writing, the person shall:

- Appoint, in writing, the relevant Responsible Persons following confirmation that these persons have sufficient knowledge and have been appropriately trained
- Appoint, in writing, An Authorising Engineer following confirmation that this person has sufficient knowledge and has been appropriately trained
- Appoint in writing the Chair of the Trust Water Safety Management Group (WSMG) which will consist of Nominated Persons from all pertinent areas to take implementation responsibility for the control of 'Water Quality' and to be legally accountable, on a joint and several liability basis, for assessing and controlling identified risks from *Legionella* and *Pseudomonas Aeruginosa* and other waterborne pathogens and safe hot water management programmes

- Seek and allocate any funds or resources required to comply with the HSE Approved Code of Practice and Guidance L8 - The Control of Legionella Bacteria in Water Systems Approved Code of Practice
- Ensure that the scope of the regulations is being fully addressed in terms of examinations and inspections

Estates Responsible Person (Water) [Estates Operations Manager]

The appointed Estates Responsible Person (Water) will be the senior manager with the correct authority, competence, professional knowledge and training to ensure that all operational procedures are carried out in a timely and effective manner.

The Estates Responsible Person (Water) will liaise closely with other professionals in various disciplines, including members of the Water Safety Management Group (WSMG).

By accepting the responsibilities of 'Estates Responsible Person (Water)' in writing, the person shall:

- Supervise the Estates Deputy Responsible Person (Water)
- Deputise for the Duty Holder in their absence
- Ensure that the Estates Deputy Responsible Person (Water) has received the necessary training to ensure competence
- Advise the Duty Holder on all matters relating to the management and control of water safety and safe hot water management and ensure that they are informed of all changes, or proposed changes, in the legislation/recommendations relating to water safety inclusive of legionella, pseudomonas aeruginosa and other waterborne pathogens which may affect the Trust, in general, and the buildings under their control.
- Ensure suitable and sufficient risk assessments are carried out by competent person(s) for water systems and air conditioning plant in line with BS8558;2019 and the HSE Approved Code of Practice and Guidance L8 - The control of Legionella Bacteria in Water Systems and The Health Technical Memoranda, HTM04-01.
- Together with the WSMG, consider each risk assessment report and ensure the design, arrangement, implementation and management of all necessary remedial works required to allow the systems to comply with the current and relevant guidelines and legislation and to ensure minimisation or control of the prevailing risk
- Ensure records are kept and maintained of the ongoing monitoring and control procedures for the prevention of Legionella
- Liaise with the Infection Prevention Doctor, Authorising Engineer (Water) and other appropriate professionals when conditions in the system(s) are outside the control parameters
- Report to the WSMG quarterly on the state of compliance and indicate any additional measures necessary to facilitate compliance
- Ensure that all estates staff or nominated contractors involved in legionella risk assessment, control and audit are trained and competent, appropriate to their duties and responsibilities. Up to date records of training must be maintained

Estates Deputy Responsible Person (Water) [Estates Compliance Manager/and or Estates Officer (Mechanical)(Mechanical)]

Accepting the responsibilities of 'Estates Deputy Responsible Person (Water)' in writing, the person shall:

- Deputise for the Estates Responsible Person (Water)
- Together with the Estates Responsible Person (Water), consider each risk assessment report and ensure the design, arrangement, implementation and management of all necessary remedial works required to allow the systems to comply with the current and relevant guidelines and legislation, and ensure minimisation or control of the prevailing risk
- Prepare and manage the implementation of the operational procedure for prevention or control of Legionella. Ensure that these requirements are communicated to all affected staff
- Ensures the design, arrangement, implementation and management of all Planned Preventative Maintenance (PPM) required to allow the systems to comply with the current and relevant guidelines and legislation, and ensure minimisation or control of the prevailing risk
- Ensure drawings of the systems are available and kept updated
- Implement, maintain and manage a logbook system which operates a 'defect log' designed to allow for the correct and timely management of any faults/shortfalls identified during the PPM visits and retain all data for five years
- Consider the logbook and defect log and advise the Estate Responsible Person (Water) via a quarterly report of the status of the water safety management and control and safe hot water management programme
- Audit on a quarterly basis the locally implemented water safety management and control (PPMs)
- Ensures competency of all contractors commissioned on water safety management and control and safe hot water management related projects
- Ensures personnel training records are kept up to date
- Ensure COSHH risk assessments have been completed and controls implemented, especially where cleaning and treatment chemicals are to be used
- Ensure maintenance personnel are provided with suitable and appropriate RPE, PPE and trained in their proper use, especially during system and tank cleaning operations
- Ensure, where work in confined spaces is required, that the requirements of the Confined Spaces Regulations are implemented
- Ensure that systems, where chemically treated, do not breach discharge conditions set out by Water Supply (Water Quality) Regulations
- Report promptly to the Responsible Person (Estates) any serious deviation outside the control limits and implement the required action to return systems to normal operation

Capital Responsible Person (Water) Projects and Strategic Development Manager

The Capital Responsible Person (Water) will have the appropriate knowledge, training and experience of hot and cold-water supply, storage and mains services.

Accepting the responsibilities of 'Capital Responsible Person (Water)' in writing, the person shall be responsible for ensuring that all new or modifications to existing water system installations are planned to ensure that all relevant hazards are designed out of the

installation and works are carried out only by contractors competent in the installation of water systems and they are aware of all relevant hazards and associated legislation. No work will be carried out without the appropriate authorisation from the Estates Responsible Person (Water) or Estates Deputy Responsible Person (Water).

When compliance cannot be achieved, the Capital Responsible Person (Water) will arrange for a relevant risk assessment to be carried out to assess the consequences of non-compliance and to identify the relevant control measures if the work is to be carried out. This will identify any Planned Preventative Maintenance required for the system and will be discussed with the Estates Responsible Person (Water) or Estates Deputy Responsible Person (Water) and the design team.

The Capital Responsible Person (Water) is responsible for ensuring that prior to any project being handed over and the water system made operational, the following is completed:

- A fully commissioned scheme including full design data on temperatures, water flow rates and pressures and commissioning procedures, data and certification
- A set of accurate as fitted drawings and schematics are issued to the Trust
- A set of accurate operational and maintenance manuals are issued to the Trust including detailed plant and equipment data
- A comprehensive scheme detailing all planned preventative maintenance tasks required
- All new/revised assets are updated on the Trust's Computer Aided Facilities Management (CAFM) system
- Appropriate disinfection procedures recommended for new and modified installations have been carried out to the required standard immediately prior to occupation
- Pre and post flush water quality sampling check certificates (where appropriate) demonstrating 'zero detection' are issued to the Trust
- The water risk assessment is either updated to reflect the alterations or in the event of major alterations, a new water risk assessment is completed by a competent and Legionella Control Association approved person/organisation

The Capital Responsible Person (Water) shall also:

- Appoint a deputy(s) to assist in the delivery of the Capital Responsible Person's (Water) tasks
- Ensure that all new and altered water systems, including minor and major modifications/refurbishments, comply with the requirements of BS 8558:2015, L8, HTM 04-01, HTM 03-01 and HTM 01-05
- Ensures that all estates staff, contractors, sub-contractors and Clerk of Works/Site Supervisors are competent, and their interpretation of the requirements are suitably assessed and confirmed
- Notify the water undertaker of any such proposed installation of water fittings and attain the water undertakers' consent before installation commences, as required by the Water Supply (Water Fittings) Regulations 1999. Note: It is a criminal offence to install or use water fittings without prior consent of the water undertaker for all new systems that include major modifications/refurbishments.
- Inform the WSMG and Estates Responsible Person (Water) and Estates Deputy Responsible Person (Water) of any forthcoming projects and ensure that an appropriate flushing program is in place and a record of flushing activity is maintained for the respective areas

- Ensure that site installation and commissioning procedures are addressed as part of the project management process. These shall include all relevant sections as described in HTM 04-01 Section 16 and within BS 8558:2015
- Ensure the procedures in the Water Safety Plan are followed
- Ensure that all specific issues around quality control of the works on site are suitably managed
- Ensure that while areas are under a contractor's control that a competent member of the Estates Team completes the required element of the log book system
- Witnesses tests and checks under the terms of contract
- Ensures that Operating and Maintenance manuals and 'as-built' drawings are provided for all building services installation, including commissioning data, disinfection certificates and biological analysis results. These shall include all relevant sections as described in HTM 04-01 Sections 18 and within BS 8558:2015.

Director of Infection Prevention and Control [DIPC]

- The DIPC shall be responsible for the implementation of the outbreak plan, should an outbreak situation associated with waterborne pathogens be suspected or confirmed.
- Attend updated management training at least every three years or sooner if determined by the training needs analysis.

Infection Prevention and Control Responsible Person (Water) [Lead Nurse, Infection Prevention and Control]

The Infection Prevention and Control (IPC) Responsible Person (Water) will provide advice and support in the management of staff and patients in the location affected in line with this policy and the Trust Water Safety Plan. The IPC Responsible Person will have responsibility for agreeing and endorsing operational procedures for the control of Legionella bacteria and *Pseudomonas Aeruginosa* in water systems in full consultation with the Trust's appointed Infection Prevention Doctor for water systems.

Accepting the responsibilities of 'Infection Prevention and Control Responsible Person (Water)' in writing, the person shall:

- Appoint a deputy to assist in the delivery of the Infection Prevention and Control Responsible Person's (Water) tasks
- Assist the WSMG, the Responsible Persons and Deputy Responsible Persons in the implementation and management of water safety, inclusive of legionella, pseudomonas aeruginosa and other waterborne pathogens and safe water management programmes across all Trust premises
- Advise on the location of "high risk" patient services and potential areas of risk, particularly those relating to medical devices.
- Support staff with the completion of a Person Susceptibility Risk Assessment for Legionnaires disease when required and advise on the actions required in accordance with the Trust Water Safety Plan.
- Assist the Water Safety Management Group with the strategic operational management of water microbiological sampling.
- Agree the contents of this policy and any further amendments required.

Infection Prevention Doctor

The Infection Prevention Doctor will provide clinical support and input to the day-to-day safe operation of water systems.

This person will:

- Provide specific advice on infection prevention and control policy in relation to the safe operation of water systems and water quality.
- Assist with the interpretation of local clinical risk assessment of patients to enable suitable implementation of appropriate Legionella risk management processes and procedures.
- Assess the impact of all existing and new water related policies and plans on infection prevention and control management and make recommendations for change.
- Shall be an integral member of the Water Safety Management Group (WSMG), advising members of the WSMG in matters relating to Legionella and *Pseudomonas Aeruginosa* risk assessments.
- Consider the risk assessment findings and, together with the members of the WSMG, prioritise any remedial works.

Hotel Services Responsible Person (Water) [Patient Environment Manager]

The Hotel Services Responsible Persons (Water) is responsible for ensuring this policy, and the procedures outlined in the Water Safety Plan, are followed within their respective areas. These responsibilities include but are not limited to: informing Estates and Infection and Prevention and Control Team when they become aware of an area containing water services which are infrequently used (little used outlets) and supporting the required flushing regimes to ensuring that outlets are flushed in accordance with the Water Safety Plan (WSP) and the requirements of this policy.

Accepting the responsibilities of 'Hotel Services Responsible Person (Water)' in writing, the person shall:

- Appoint a deputy(s) to assist in the delivery of the Hotel Services Responsible Person's (Water) tasks
- Assist the WSMG, the Responsible Persons and Deputy Responsible Persons in the implementation and management of water safety inclusive of Legionella, *Pseudomonas Aeruginosa* and other waterborne pathogens and safe hot water management programmes, across all Trust premises
- Assist the WSMG with the strategic and operational management of water, especially those aspects relating to identification of infrequently used outlets, and the necessary flushing regimes which need to be actioned.
- Agree the contents of this policy and agrees any amendments
- Ensure management practices are maintained for the completion, review and return of all documentation associated with routine and enhanced flushing activities, ensuring that any areas which are not being flushed or accessed for any reason are escalated for action.

Estates Competent Person

The Estates Competent Person will have adequate knowledge and training for work/tests on water, storage and distribution systems and will be appointed in writing by the Estates Responsible Person (Water).

The Estates Competent Person(s) shall:

- Ensure that all procedures, safe working practices and permits to work are followed and that any personal protective equipment or clothing is used
- Promptly report all defects, unusual occurrences and other anomalies, as appropriate, to the Deputy Responsible Person (Estates)
- Work with the Deputy Responsible Person (Estates) and identify hazards and reduce risks by following safe working practices
- Complete written records when required

Water Safety Management Group (WSMG)

The Water Safety Management Group (WSMG) will ensure a strategic approach is taken in the management of Legionella and *Pseudomonas Aeruginosa* throughout the Humber Teaching NHS Foundation Trust.

The group will provide a forum for communication and consultation on all water related issues and oversee the development, implementation and ongoing monitoring of the Trust's Water Management Policy.

The group will also formally develop; monitor and risk assess the Trust's Water Safety Plan.

Accepting the responsibilities of 'Nominated Persons' in writing from the group Chair, all members of the WSMG shall:

- Ensure that there is a proactive approach to organising, planning, controlling and reviewing Health and Safety. Further Health & Safety responsibilities of Managers are given in the Trust's Health & Safety Policy
- Assist in the implementation and management of water safety inclusive of legionella, *pseudomonas aeruginosa* and other waterborne pathogens and safe hot water management programmes, across all Trust premises
- Ensure that appropriate staff, under their control, are given suitable information, instruction and training regarding water systems. Records should be maintained of training and competency.
- Notify the Estates Responsible Person (Water) and Estates Deputy Responsible Person (Water) of any changes to period and/or type of use of any sections/areas under their control
- Notify the Estates Responsible Person (Water) and Estates Deputy Responsible Person (Water) of any section/areas shut-downs or vacations of sections/areas under their control

Authorising Engineer (Water)

The Authorising Engineer (Water) will act as an independent professional adviser to the Trust. The Authorising Engineer (Water) will be appointed by the Estates Responsible Person (Water) with a brief to provide services in accordance with Health Technical Memoranda guidance. The Authorising Engineer (Water) will act as an assessor and make recommendations for the appointment of Responsible Persons, monitor the performance of the service, and provide a 6 monthly Management/Operational Audit and an Annual Governance Audit to the WSMG.

The Authorising Engineer (Water) shall:

- Monitor the effectiveness of this Policy and the Water Safety Plan
- Where required by the Trust and in conjunction with the appointed Capital Responsible Person (Water), ensure that the specification, and the design engineer's competence and interpretation of the requirements are suitably assessed and confirmed and ensure that all contractors' competence and their interpretation of the requirements are suitably assessed and confirmed and will also ensure the Site Supervisor/Clerk of Works' competence and interpretation of the requirements
- Where required by the Trust and in conjunction with the appointed Capital Responsible Person (Water), contribute to the design process and ensure all water and air systems, implicated within the design remit, comply with the requirements of L8, HTM 04-01 and BS 8558:2015
- Where required by the Trust provide a design compliance certificate and installation review memorandum
- Where required by the Trust, carry out an audit and monitor during construction, to ensure upon completion, the scheme complies with the requirements
- Supply training, advice and assistance in all water safety matters
- Carry out a system and process audit on a six-monthly basis, as instructed by the WSMG

Service Managers, Unit Managers, Matrons and Senior/Team Leaders

Service Managers, Unit Managers, Matrons and Senior/Team Leaders are required to take responsibility for the usage of their areas and buildings, with particular reference to changes to use or occupation which may predicate water services becoming infrequently used (no use for 3 consecutive days or more). In this regard, those responsible shall ensure that operational processes are in place for submission of a **Site Flushing Evaluation Form**, into the Estates Helpdesk: HNF-TR.Estates@nhs.net

The submission of the **Site Flushing Evaluation Form** will be a focused requirement for all inpatient sites, as well as premises or areas which have been reviewed at the WSMG as posing sufficient risk.

Where required, a weekly evaluation shall take place and the **Site Flushing Evaluation Form** completed and submitted into the Estates Helpdesk: HNF-TR.Estates@nhs.net

The only exception would be any such time when an updated review is undertaken which identifies a new area previously unreported into the Estates Helpdesk, this will then require submission of a new **Site Flushing Evaluation Form**, in addition to the weekly evaluation.

Those responsible should take a pro-active approach in this regard, and notify the Estates Helpdesk as soon as water services become identified that are either infrequently used, or will become infrequently used in the near future. This approach will assist Estates and Hotel Services to take the required risk management precautions and implement all appropriate processes and procedures in a timely manner.

In the event that Hotel Services and Estates have inadequate resource to implement the enhanced flushing requirements, or should there be other logistical or operational reasons preventing this (i.e. clinical risk assessment or limitation of access), then the site will take responsibility for ensuring that the required flushing is carried out. The Manager for the area will need to identify person(s) who will be responsible for undertaking the flushing regimes, and to ensure that the required documentation is completed in consultation with Hotel Services and Estates. In **all** cases the **Enhanced Flushing Record** shall be completed and a scanned copy emailed to the Estates Information Office: email hnf-tr.flushingsheets@nhs.net

Service Managers, Unit Managers, Matrons and Senior/Team Leaders must notify the Estates Department of any changes to period and/or type of use of any sections/areas under their control, which have the potential to impact on the utilisation of water systems in those areas.

Employees

All employees have an individual responsibility for safe water management in line with their duties and working environment. Each employee or agent of the Trust has an individual responsibility to:

- Co-operate with the Trust's management in the implementation of this policy
- Report any poor management in relation to safe water management to their supervisor/manager
- Report immediately to the Estates Helpdesk any areas containing water outlets which are not in use or have had no use for 3 consecutive days or more.
- To undergo appropriate training as defined and required by the Estates Responsible Person (Water)

Contractors

Contractors, other employers or individuals providing goods and/or services to the Trust are required to fully comply with Trust's policy and Water Safety Plan regarding safe water management.

5. PROCEDURES RELATING TO THE POLICY

Testing for Legionella and Pseudomonas Aeruginosa Bacteria

The Infection Control Responsible Person (Water) will consider the level of risk and decide whether testing is required.

Testing will be required as defined in the Water Safety Plan.

System Design

The design of all new systems and alteration to existing systems shall incorporate the features and precautions recommended in HSE Approved Code of Practice L8 (HSG274) 'The Control of Legionella Bacteria in Water Systems', Health Technical Memorandum (HTM) 04-01 'Water Systems' and Addendum, The Water Supply (fittings) Regulations 1999, BS EN 806:2012 and BS 8558:2015 to remove all potential sources of seeding, growth and spread of Legionella and/or *Pseudomonas Aeruginosa*.

No modifications to any water system, or new water system installation, will be carried out without consultation and agreement with the Estates Responsible Person (Water) and/or Estates Deputy Responsible Person. This includes water system controls and monitoring systems.

Water Risk Assessment

Suitable and sufficient water risk assessments are to be carried out by a competent and Legionella Control Association approved person/organisation in full compliance with BS8580:2019 and as specified in The Control of Legionella Bacteria in Water Systems (L8) ACoP and HTMs and in full consultation with the Estates Responsible Person (Water) and Estates Deputy Responsible Person (Water) and in line with the Trust Water Safety Plan.

Records

The Estates Responsible and Deputy Responsible Persons (Water) will ensure the appropriate records are kept, as defined in the Water Safety Plan.

Monitoring

Monitoring is as defined in the Water Safety Plan using appropriate record and audit forms.

The Capital Responsible Person or Deputy (Water) will follow the requirements of the Water Plan for all capital projects, including the requisite permits and approvals for vacation and re-occupation, this must be consulted with the relevant Responsible Persons, and where further assurance is appropriate, tabled at the Water Safety Management Group to ensure that adequate control is maintained.

Water Safety Plan

The Water Safety Plan referred to throughout this policy is to be used to manage and monitor all water systems and compliance, including all relevant permits and flushing documentation.

6. CONSULTATION

Consulted With	Post/Committee/Group	Date
Peter Beckwith	Director of Finance	April 2019
Rob Atkinson	Deputy Director of Estates and Finance	
Paul Dent	H&S, Fire, Security & PPE Manager	
Andrew Cole	Estates Compliance Officer - Mechanical	
Debbie Davies	Lead Nurse, Infection Prevention and Control	
Jayne Morgan	Patient Environment Manager	
Virginia Hemingway	Patient Services Manager	
Nigel Hewitson	Modern Matron – Adult Mental Health	
Steven Leeman	Estates Operations Manager	
Dr David Hamilton	Infection Prevention Doctor	
Helen Jones	Authorising Engineer Water	
Members	Water Safety Management Group	
Members	Health and Safety Group	

7. IMPLEMENTATION AND MONITORING

The purpose of this policy is to ensure compliance with the Health and Safety Executive Approved Code of Practice (ACoP) L8 'The Control of Legionella Bacteria in Water Systems', including the 2013 addendum and HTM 04-01 'Water Systems'.

The aim is to reduce the risk to staff, patients and visitors, of exposure to Legionnaires disease and Pseudomonas Aeruginosa where water is used or stored in Humber NHS Foundation Trust premises and to ensure the necessary control measures are in place.

8. TRAINING AND SUPPORT

Those who are appointed in writing to carry out the control measures and strategies will be suitably informed, instructed, trained and suitability assessed which ensures that tasks are

carried out in a safe and technically competent manner. Regular refresher training will be provided and supported by the Duty Holder and Designated Person (Water), records of all initial and refresher training will be maintained.

All members of staff including those with managerial responsibilities for water systems will receive training commensurate with their duties as identified in the table below:

Role	Training Requirement	Period
Designated Person	Accredited Responsible Person (Water) Course	Every 3 years
Responsible Person(s)	Accredited Responsible Person (Water) Course	Every 3 years
Competent Person	Accredited Competent Person (Water) Course	Every 3 years
Capital Projects Team	Accredited Competent Person (Water) Course	Every 3 years
Estates Operatives and nominated other (Site Handypersons, Targeted Contractors and HTNFT staff)	Legionella Awareness Course	Annual
Hotel Services Supervisors	Legionella Awareness Course	Annual
Infection Control Team	Legionella Awareness Course	Annual

Although training is an essential element of competence, it is not the only factor – it should be viewed as a product of sufficient training, experience, knowledge and other personal qualities which are needed to undertake a job safely. Competence is dependent on the needs of the situation and the nature of the risks involved.

9. REFERENCE TO ANY SUPPORTING DOCUMENTS

- Humber Teaching NHS Foundation Trust Water Plan
- Health and Safety at Work Act 1974
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Control Of Legionella Bacteria In Water Systems (L8) Approved Code Of Practice
- BS8580;2019 (Risk Assessments for Legionella)
- The control of Legionella Bacteria in Water Systems and The Health Technical Memoranda, HTM04-01
- BS 8558:2015 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages - complementary guidance to BS EN 806
- Health Technical Memorandum, HTM 03-01 and HTM 01-05
- The Water Supply (fittings) Regulations 1999
- BS EN 806: Specifications for installations inside buildings conveying water for human consumption.
- The Management of Health and Safety at Work Regulations 1999
- “Hotel Services/Estates Department Flushing Regimes” document
- “Enhanced Flushing Record” document (Estates/Hotel Services)

- “Routine Flushing: Shower Record” document (Estates/Hotel Services)
- “Seclusion Suite: Routine Enhanced Flushing Record”
- Water Safety Management and Control - Written Schemes (site specific).

10. MONITORING COMPLIANCE

This Policy will be reviewed on an annual basis by the Water Safety Management Group to ensure that:

- The Water Plan and Standard Operating Procedures/Written Schemes are reviewed and updated.
- Procedures for managing water safety and working on water systems are followed.
- Risk Assessments are instructed and reviewed in an acceptable timescale.
- Those undertaking Legionella Risk Assessments have the necessary accreditation with the Legionella Control Association.
- Humber TNFT staff and nominated partners have up to date awareness training.
- Review of contractor selection and control measures.
- Contractors working on Trust water systems have Water Safe accreditation.
- New build premises and major capital projects are consulted at the Water Safety Management Group, to ensure that operational controls and agreed standards for commissioning are agreed and monitored throughout. Ad-hoc meetings may be required to adequately cover the required assurances.
- Incidents that are reported/recorded on Datix are investigated by the relevant Responsible and Deputy Responsible Persons (Water)
- All findings from any investigation are reported back to the Water Safety Management Group for discussion and review.

APPENDIX 1: DOCUMENT CONTROL SHEET

This document control sheet, when presented to an approving committee must be completed in full to provide assurance to the approving committee.

Document Type	Policy		
Document Purpose	Statutory compliance, corporate assurance and documented guidance to ensure that buildings are maintained in a safe condition, that Trust locations are assessed and monitored for potential Legionella risk, and to ensure that a multi-disciplinary culture is in place. That the Trust Water Safety Management Group provides adequate assurance in this regard, and to ensure that appropriate consultation takes place for planned maintenance, monitoring regimes, changes to accommodation affecting the estate, and for instances where monitoring has identified systems which require remedial actions.		
Consultation/ Peer Review:	Date:	Group/Individual	
<i>List in right hand columns consultation groups and dates</i>	Nov 2022	Director of Finance	
	Nov 2022	H&S, Fire, Security & PPE Manager	
	Nov 2022	Estates Compliance Manager - Mechanical	
	Nov 2022	Clinical Nurse Specialist (Infection Control)	
	Nov 2022	Patient Environment Manager	
	Nov 2022	Patient Services Manager	
	Nov 2022	Estates Operations Manager	
	Nov 2022	Infection Prevention Doctor	
	Nov 2022	Authorising Engineer Water	
	Nov 2022	Water Safety Management Group	
	Nov 2022	Health and Safety Group	
Approving Committee:	Water Safety Management Group	Date of Approval:	6 th June 2019
Ratified at:	Health and Safety Group	Date of Ratification:	12 th June 2019
Training Needs Analysis:	For 6 individuals: Accredited Responsible Person (Water) Training All Training Completed	Financial Resource Impact	Yes: To be included within 2019/20 Estates training application.
Equality Impact Assessment undertaken?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	N/A [<input type="checkbox"/>] Rationale:
Publication and Dissemination	Intranet [<input checked="" type="checkbox"/>]	Internet [<input type="checkbox"/>]	Staff Email [<input type="checkbox"/>]
Master version held by:	Author [<input checked="" type="checkbox"/>]	HealthAssure [<input checked="" type="checkbox"/>]	
Implementation:	<i>Describe implementation plans below - to be delivered by the author:</i>		
	Integral to duties of Responsible and Deputy Responsible Persons, oversight via the Water Safety Management Group.		
Monitoring and Compliance:	Continual review by Responsible and Deputy Responsible Persons and oversight of Water Safety Management Group (meets quarterly) including independent audit by Trust appointed Authorising Engineer (Water). Amended as and when new legislation and guidance requires.		

Document Change History:			
Version Number/Name of procedural document this supersedes	Type of Change i.e. Review/Legislation	Date	Details of Change and approving group or Executive Lead (if done outside of the formal revision process)
V1.3	Review	24 June 2016	ISCC/EMT - Amendment regarding completion of a 15% random sampling check of flushing sheets
V1.4	Review	June 2019	-Review of responsibilities following Estates re-structure. -Creation of role: Hotel Services Responsible Person (Water) -Changes to Routine and Enhanced Flushing Regimes (including Seclusion Suites) -Implementation of Site Flushing Evaluation Forms -Review of frequency for Legionella Risk Assessments
V1.5	Review -Minor changes	29 Nov 2022	-Review of responsibilities following Estates re-structure. Minor changes to peoples titles. Approved at HAIG (29/11/22).

APPENDIX 2: EQUALITY IMPACT ASSESSMENT (EIA)

For strategies, policies, procedures, processes, guidelines, protocols, tenders, services

1. **Document or Process or Service Name:** Water Management Policy
2. **EIA Reviewer (name, job title, base and contact details):** Steven Leeman, Estates Operations Manager
3. **Is it a Policy, Strategy, Procedure, Process, Tender, Service or Other?** Policy

<p>Main Aims of the Document, Process or Service</p> <p>To ensure that a transparent consistent process is in place for the safe management and control of water systems across the Trust estate, compliant with relevant statutory requirements, codes of practice, British Standards and Humber Teaching NHS Foundation Trust in-house procedures.</p> <p>To achieve a duty of care for Trust staff based in properties which are owned and maintained by others, and to achieve an effective multi-disciplinary response and oversight for water monitoring requirements, and works undertaken as part of capital project and planned maintenance, the Policy identifies the forums, processes and individuals who have responsibilities and duties.</p>
<p>Please indicate in the table that follows whether the document or process has the potential to impact adversely, intentionally or unwittingly on the equality target groups contained in the pro forma</p>

<p>Equality Target Group</p> <ol style="list-style-type: none"> 1. Age 2. Disability 3. Sex 4. Marriage/Civil Partnership 5. Pregnancy/Maternity 6. Race 7. Religion/Belief 8. Sexual Orientation 9. Gender re-assignment 	<p>Is the document or process likely to have a potential or actual differential impact with regards to the equality target groups listed?</p> <p>Equality Impact Score</p> <p>Low = Little or No evidence or concern (Green)</p> <p>Medium = some evidence or concern (Amber)</p> <p>High = significant evidence or concern (Red)</p>	<p>How have you arrived at the equality impact score?</p> <ol style="list-style-type: none"> a) who have you consulted with b) what have they said c) what information or data have you used d) where are the gaps in your analysis e) how will your document/process or service promote equality and diversity good practice
--	---	--

Equality Target Group	Definitions	Equality Impact Score	Evidence to support Equality Impact Score
Age	<p>Including specific ages and age groups:</p> <p>Older people Young people Children Early years</p>	Low	Legionella Risk Assessments, clinical risk assessments and standard operating procedures (Trust Water Plan). In conjunction with multi-disciplinary approach and consultation at the Water Safety Management Group, these are to be followed to ensure that buildings are safe, and that control measures are in place whenever maintenance or alterations are carried out, or when water monitoring indicates that remedial actions are required.
Disability	<p>Where the impairment has a substantial and long term adverse effect on the ability of the person to carry out their day to day activities:</p> <p>Sensory Physical Learning Mental health</p> <p>(including cancer, HIV, multiple sclerosis)</p>	Low	Policy applies for all groups and is applicable across all of our estate, irrespective of specific patient profile.
Sex	<p>Men/Male Women/Female</p>	Low	Legionella Risk Assessments, clinical risk assessments and standard operating procedures (Trust Water Plan). In conjunction with multi-disciplinary approach

			and consultation at the Water Safety Management Group, these are to be followed to ensure that buildings are safe, and that control measures are in place whenever maintenance or alterations are carried out, or when water monitoring indicates that remedial actions are required. Not gender specific.
Marriage/Civil Partnership		Low	Legionella Risk Assessments, clinical risk assessments and standard operating procedures (Trust Water Plan). In conjunction with multi-disciplinary approach and consultation at the Water Safety Management Group, these are to be followed to ensure that buildings are safe, and that control measures are in place whenever maintenance or alterations are carried out, or when water monitoring indicates that remedial actions are required.
Pregnancy/ Maternity		Low	Legionella Risk Assessments, clinical risk assessments and standard operating procedures (Trust Water Plan). In conjunction with multi-disciplinary approach and consultation at the Water Safety Management Group, these are to be followed to ensure that buildings are safe, and that control measures are in place whenever maintenance or alterations are carried out, or when water monitoring indicates that remedial actions are required.
Race	Colour Nationality Ethnic/national origins	Low	Legionella Risk Assessments, clinical risk assessments and standard operating procedures (Trust Water Plan). In conjunction with multi-disciplinary approach and consultation at the Water Safety Management Group, these are to be followed to ensure that buildings are safe, and that control measures are in place whenever maintenance or alterations are carried out, or when water monitoring indicates that remedial actions are required. Covers all sites, not specific to any nationality or ethnicity.
Religion or Belief	All religions Including lack of religion or belief and where belief includes any religious or philosophical belief	Low	Legionella Risk Assessments, clinical risk assessments and standard operating procedures (Trust Water Plan). In conjunction with multi-disciplinary approach and consultation at the Water Safety Management Group, these are to be followed to ensure that buildings are safe, and that control measures are in place whenever maintenance or alterations are carried out, or when water monitoring indicates that remedial

			actions are required.
Sexual Orientation	Lesbian Gay Men Bisexual	Low	Covers all groups
Gender reassignment	Where people are proposing to undergo, or have undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attribute of sex	Low	Not applicable

Summary

<p>Please describe the main points/actions arising from your assessment that supports your decision above:</p> <p>This is an organisational policy with respect to safe water management for Humber Teaching NHS Foundation Trust. This is achieved through the consistent application of Legionella Risk Assessments, clinical risk assessments and standard operating procedures.</p> <p>In conjunction with a multi-disciplinary approach and consultation at the Water Safety Management Group, these standards are followed to ensure that buildings are safe, and that control measures are in place whenever maintenance or alterations to buildings are carried out, or when water monitoring indicates that remedial actions are required.</p> <p>Consistent practice is in place, in accordance with the Trust Water Plan, this applies to all Responsible and Deputy Responsible Persons (Water), attendees of the Water Safety Management Group and across all aspects of the Estates Operations and Capital Project team, their partners and appointed contractors.</p> <p>By means and application of this policy, Humber Teaching NHS Foundation Trust seeks to achieve multi-disciplinary oversight and assurance, in consultation with the Water Safety Management Group, and in accordance with the Trust Water Plan, as advised by legislation (i.e. Control of Substances Hazardous to Health Regulations 2002 (COSHH)) and approved codes of practice (i.e. The Control Of Legionella Bacteria In Water Systems (L8) Approved Code Of Practice and The control of Legionella Bacteria in Water Systems and The Health Technical Memoranda, HTM04-01)</p>	
EIA Reviewer: Steven Leeman Estates Operations Manager	
Date completed: November 22, 2022	Signature: 