Water Safety Management Policy
(including Legionella, Pseudomonas and Scalding)

POLICY REFERENCE NUMBER: RM19
VERSION NUMBER: 1
REPLACES SEPT DOCUMENT Legionella Control Policy
REPLACES NEP DOCUMENT Operation and Maintenance Policy for the Management and Control of Legionella bacteria in water services
AUTHOR: [Name], Head of Estates and Facilities
CONSULTATION GROUPS: HSSC, Water Quality Group
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POLICY SUMMARY
EPUT is committed to providing water systems and services that:

- Meet the requirements of ACoP L8
- Meet the requirements of HTM 04-01
- Provides wholesome water within all trust buildings
- Will not put the end user at risk of scalding or infection

The Trust monitors the implementation of and compliance with this policy in the following ways:

The water quality group will monitor implementation and compliance. Quarterly reports will be submitted to HSSC.

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</table>

The Director responsible for monitoring and reviewing this policy is
Executive Director of Finance & Resources
<table>
<thead>
<tr>
<th>CONTENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 INTRODUCTION</td>
</tr>
<tr>
<td>2.0 PRINCIPLES</td>
</tr>
<tr>
<td>3.0 DUTIES</td>
</tr>
<tr>
<td>4.0 DEFINITIONS</td>
</tr>
<tr>
<td>5.0 MONITORING OF IMPLEMENTATION AND COMPLIANCE</td>
</tr>
<tr>
<td>6.0 LEGISLATION AND GUIDANCE</td>
</tr>
<tr>
<td>7.0 REFERENCE TO OTHER TRUST POLICIES/PROCEDURES</td>
</tr>
</tbody>
</table>

**APPENDICES**

**APPENDIX 1 – WATER QUALITY GROUP TERMS OF REFERENCE**
ESSEX PARTNERSHIP UNIVERSITY NHS FOUNDATION TRUST

Water Safety Management Policy (including Legionella, Pseudomonas and Scalding)

Assurance Statement

Essex Partnership University NHS Foundation Trust (EPUT) accepts its responsibility under the Health and Safety at Work etc. Act 1974 and the Control of Substances Hazardous to Health Regulation 2002 (as amended), to take all reasonable precautions to prevent or control bacterial contamination of water and scalding risks to residents, patients, visitors, staff and other persons working at, visiting or using its premises.

1. INTRODUCTION

General

This Policy shall apply to all EPUT premises whether owned or occupied by EPUT under lease or other Service Level Agreements (SLA’s). Where the management of buildings/areas occupied by EPUT staff and/or patients is carried-out by others, the requirements of this Policy remain applicable although implementation of site specific Risk Management requirements maybe managed by local Policies. It remains; therefore, EPUT’s responsibility to ensure that the requirements of this Policy are adhered to and complied with.

The Policy applies to all domestic hot and cold water systems and all other systems that include the use of water.

There are currently no evaporative cooling systems present within the Estate and this Policy forbids the installation of such systems on any site owned and managed by EPUT.

Legionella

Legionnaires’ Disease is a potentially fatal pneumonia caused by Legionella bacteria. It is the most well-known and serious form of a group of diseases known as Legionellosis. Other similar (but usually less serious) conditions include the allergic reaction Pontiac fever.

The Legionella bacteria thrive at temperatures between 20-45°C if the conditions are right, e.g. if there is a supply of nutrients present (such as rust, biofilm, sludge, scale, algae and other bacteria) and the water is warm and stagnant. This knowledge provides our main control strategy of (a) Temperature – keep the water hot or cold; (b) Cleanliness – keep the system clean; and (c) Flowing – avoid stagnation and maintain good turn-over and flow of the water. Legionella bacteria are killed by high water temperatures. This group of bacteria infects the lungs primarily by inhalation of aerosol droplets, and there is no person to person transfer. The primary source of a Legionella infection will be from domestic hot and cold water systems in Trust buildings. The EPUT lead on Legionella will be the Compliance Manager and Responsible Persons (Water) who are suitably trained and competent Estates Managers.
Pseudomonas

Pseudomonas is a Gram-negative opportunistic pathogenic bacterium. It also requires moist environments, but unlike Legionella it can infect almost any organ in the body. Sources of Pseudomonas are less certain than for Legionella, and although it may be found in the domestic water pipe-work it is more commonly a distal contamination due to poor hygiene, poor cleaning and local contamination. As such a multi-disciplinary approach and multi-team responsibilities are required.

EPUT do not have patients that would normally be considered at high risk from Pseudomonas infection. Management of any Pseudomonas risk will be undertaken by the EPUT Director for Infection, Prevention and Control in association with the Water Quality Group.

2.0 PRINCIPLES

This Policy will introduce a structured Procedure and Reporting Schedule, for the safe management of all water services in compliance with current Guidelines (HTM's, HGN's, Model Engineering Specifications and Approved Codes of Practice), Legislation and Water Supply Regulations. It should be read in conjunction with the Operational Procedure for the Safe Management of Water (including Legionella, Pseudomonas and scalding)

As required by the Health and Safety Executive Approved Code of Practice (L8), (4th Edition 2013) EPUT will:

1. Identify and assess all sources of risk;
2. Prepare a control system for preventing, reducing or controlling the risk;
3. Implement, manage and monitor precautions;
4. Maintain suitable and sufficient records of the precautions implemented and will carry this out for each of the health care premises within the Trust's control.
5. Appoint a person to be managerially responsible for the maintenance and leadership of the control system and measures adopted to prevent contamination of the water systems.
6. Appoint an independent advisor to oversee and audit all operational matters, attend the water quality group meetings and provide technical assistance where required.

3.0 DUTIES

EPUT as employers have a general duty under The Health and Safety at Work Act etc. 1974 to ensure so far as is reasonably practicable, the health, safety and welfare of all their employees. Full details on EPUT compliance with the Health and Safety at Work Act can be found in the EPUT Health and Safety Policy.

The EPUT board of Directors, as Duty Holders, have overall responsibility for the implementation of this Policy to ensure that safe, reliable hot and cold water supply, storage and distribution systems are operated within EPUT premises. The Water Quality Group will oversee and advise on operational matters regarding water quality. The water quality group will report into Health Safety Security Committee who in turn report to the Executive Team.

The EPUT board of Directors have a statutory duty to ensure that compliance with this Policy and associated Procedural documents is continual and not notional. EPUT must be able to demonstrate it has identified all the risks and put in place corrective or preventive actions and is monitoring the implemented management plans
The Associate Director of Estates & Facilities, Authorised Person, will appoint, in writing, Responsible Persons, to take day-to-day responsibility for the management of water quality and to be responsible for assessing and controlling identified risks in EPUT premises EPUT buildings (whether owned, leased or occupied).

The responsible person(s) will be a senior estates and facilities manager and will be appointed in writing. They will have sufficient authority, competence and knowledge of the installations under their control to ensure that all risk are managed and that operational procedures are carried out safely and in a timely and effective manner to protect the health and safety of everyone using the water services in EPUT premises. They will be suitably trained to ensure tasks are carried out in a safe and technically competent manner; and receive regular refresher training. They should have a clear understanding of their duties and the overall health and safety management structure and policy in the organisation.

Local site managers will be responsible for local tasks such as flushing of little used outlets. They will be suitably trained to ensure they understand what tasks they are responsible for and why they are doing them.

A Water Quality Group is set up to oversee the management of the risks associated with the water services on EPUT premises. The terms of reference for the Water Quality Group are set out in Appendix 1.

The Responsible Person shall monitor and report to the Water Quality Group the requirements and efficacy of all training programmes implemented for associated staff. Training will be carried out at least 3 yearly to ensure the competency of staff. Attendance will be recorded and relevant training certificates maintained ready for inspection if required.

### 4.0 DEFINITIONS

For the purposes of this Policy, EPUT Estate comprises all the buildings currently owned or occupied (under a full maintenance lease or otherwise) by EPUT. A full list of properties/buildings and status of occupation is available on request from EPUT's Estates Department.

For the purposes of this Policy, the Service Providers are organisations that supply EPUT with services pertaining to "Water Safety Management & Control", whether Facilities Management, Water Treatment, or Consultancy, etc.

### 5.0 MONITORING OF IMPLEMENTATION AND COMPLIANCE

The Associate Director of Estates and Facilities will ensure a water (Legionella and Pseudomonas if required) risk assessment of all the building services which comprise the Trust's estate is undertaken, reviewed regularly and in line with the requirements of ACoP L8 and HTM04-01. The risk assessment will comply with the requirements of BS8580 and will be undertaken by a competent independent specialist who is a member of the Legionella Control Association. The risk assessment will provide guidance on control measures that are required to manage identified risks. A schematic diagram will be produced which detail all trust assets that require scheduled maintenance and/or inspection as part of the written scheme of control.
The risk assessment will detail any non-conformity that requires rectification as well as highlight any high risk systems within the building.

The primary Legionella control measures in Trust premises will be temperature control and regular usage or flushing services. If these control measures are no effective the Legionella risk assessment will be reviewed and additional control measures, such as the use of chemical will be considered. All control measures shall be recorded.

Legionella sampling is not normally required but may be undertaken to confirm that control measures remain effective. All samples shall be taken following procedures outline in BS7592 analysed at a UKAS accredited laboratory.

Pseudomonas sampling will only be carried out under the direction of EPUT DIPC as EPUT do not have high risk patients occupying their premises under normal circumstances.

On receiving a positive sample result the guidance detailed in the associated operational procedure will be followed.

A water quality group will meet regularly to monitor and oversee compliance with the water quality policy and procedures. This will have representation from estates and facilities, (Operations and Properties), infection control, risk management, senior clinicians, microbiologist and the independent advisor.

### 6.0 LEGISLATION AND GUIDANCE

EPUT, in implementing this policy, shall use as a principle source of guidance, the documents listed below:

3. HSG274 Parts 1-3 - Legionnaires Disease Technical Guidance. (Parts 1 and 3 2013, part 2 2014)
5. Heating and ventilation systems Health Technical Memorandum 03-01: Specialised ventilation for healthcare premises.
8. Control of Substances Hazardous to Health Regulations 2002
11. BS 7592:2008 Sampling for Legionella bacteria in water systems.
12. BS 8558:2015 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages.
13. BS 8554:2015 Code of Practice for the sampling and monitoring of hot and cold water services in buildings
14. PD 855468:2015 Guide to flushing and disinfection of services supplying water for domestic use within buildings and their curtilages
15. TM 13:2013 CIBSE Technical Memorandum - Minimising the Risk of Legionnaires Disease
17. Health Building Note 13 – Sterile Service Departments – 2004
18. HTM03-01

7.0 REFERENCE TO OTHER TRUST POLICIES/PROCEDURES

Other Trust Policies and Procedures which should be read in conjunction with this policy include, but are not limited to:

- RM21 - Management of Asbestos Policy
- RM20 - Cleaning Policy
- ICP1 - Infection Control Policy
- Risk Management

END