

# **Water Management Policy**

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## Version Control History

Version Number	Date of Change	Summary of Revisions Made
1	November 2016	<p>New policy that defines how the College will identify, control and manage the risks arising from exposure to Legionella bacteria in water systems in accordance with the HSE's Approved Code of Practice (L8) and associated legislation.</p> <p>This document outlines responsibilities and how this will be managed.</p>
1.1	December 2018	Change of role to Quality Manager. Change of Owner, lead author and lead editor.
1.2	May 2022	<ul style="list-style-type: none"> <li>1 Inclusion of relevant legislation.</li> <li>3.1 Amendment to legionellosis explanation.</li> <li>3.3 Change of wording from "people suffering from chronic" to "people with chronic".</li> <li>5.2 Change of COO to Head of HR&amp;OD.</li> <li>5.7 Removal of HSWA to carry out site inductions with contractors.</li> <li>5.9 Change from Health and Safety Officer to Health, Safety and Wellbeing Adviser.</li> <li>6 Revised edition of HSE publication L8. Amendment to footer to reflect Lead Author and review date.</li> </ul>
1.3	November 2022	Footer updated to reflect new template model.
1.4	April 2024	<p>Updated to UHI Perth branding.</p> <p>Footer updated to remove 'Owner' and update Lead Author to Head of Estates.</p> <p>Title page updated to add information on alternative formats.</p>

# Water Management Policy

## 1 Purpose

UHI Perth recognises its legal responsibilities and requirements of the Health and Safety at Work etc Act 1974, the Control of Hazardous Substances Regulations 2002 and the Management of Health and Safety at Work Regulations 1999, to take all reasonable precautions to prevent or control the risks to staff, students and others from exposure to Legionella bacteria.

This policy defines how UHI Perth will identify, control and manage the risks arising from exposure to Legionella bacteria in water systems in accordance with the HSE's Approved Code of Practice (L8) and associated legislation.

This document will outline responsibilities and how this will be managed.

## 2 Scope

This policy will apply to all workplaces where UHI Perth has control over the workplace; the hot and cold-water systems and any system containing water where there is a risk of legionella or other bacteria developing and being transmitted to people via release of spray or aerosol during operation or maintenance. It applies to employees, students, contractors, members of the public and others that may be affected by its work activities eg agency workers.

## 3 Definitions

### **Legionnaires' Disease:**

Legionellosis is a collective term for disease caused by legionella bacteria including the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia. Legionella bacteria are widespread in natural water systems, eg rivers and ponds. However, the conditions are rarely conducive for people to catch the disease from these sources. Outbreaks of the illness occur from exposure to legionella growing in purpose-built systems where water is maintained at a temperature high enough to encourage growth eg cooling towers, hot and cold-water systems, spa pools etc.

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**Lead Author:** Head of Estates

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**EQIA Approval Date:** June 2022

## **Proliferation Temperatures:**

Water temperatures in the range 20°C to 45°C are widely considered to be the parameters which favour growth. The organisms do not appear to multiply significantly below 20°C and will not normally survive above 60°C. They may, however, remain dormant in cool water and multiply only when water temperatures reach a suitable level.

## **Persons at Risk:**

Everyone is susceptible to infection; however, the risk increases with age, but some people are at a higher risk eg people over 45, smokers, people with chronic respiratory or kidney disease, diabetes, lung and heart disease or anyone with an impaired immune system.

Infection is caused by breathing in small droplets of water contaminated by the bacteria. The disease cannot be passed from one person to another.

## **Duty Holder:**

The person on whom the statutory duty falls.

## **Responsible Person:**

The responsible person has managerial responsibility for the implementation of the findings of the legionella risk assessment and written scheme.

## **Written Scheme:**

A site-specific technical document, which defines the control measures and procedures to maintain efficient and effective control of its water systems for ongoing compliance with current UK Regulations.

It will include the following:

Risk assessment information, schematic drawing showing the layout of the water systems and their location within and around the premises, the correct and safe operation of the system, precautions in place to prevent or minimise risk associated with the system, checks to carry out to ensure the written scheme is effective and the frequency of such checks, remedial action to take if the written scheme is shown to be not effective.

## **The Water Hygiene Service Provider:**

A person or company appointed by the 'Responsible Person' to assist the organisation in the prevention, control and compliance of the risks associated with Legionella bacteria in line with HSE's Approved Code of Practice (L8) as agreed in the contract specification.

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## 4 Key Principles

UHI Perth shall ensure:

That appropriately qualified, trained, technically competent and experienced staff are available and resourced to adequately manage water systems and associated legionella control.

The risks from the proliferation of legionella bacteria that may exist in our water systems are identified, controlled and managed, in line with the HSE's Approved Code of Practice (L8).

There are procedures in place to deal with any legionella incidents ie if the control measures fall short of what is expected.

## 5 Responsibilities

The organisational structure for the implementation and management of the UHI Perth statutory health and safety duties are described in detail in the Health and Safety Policy.

Specific duties relating to this policy are detailed below.

### **Principal and Chief Executive**

Is the Duty Holder from a legal perspective, however, the day-to-day responsibility of ensuring this policy is adhered to are set out below.

### **Head of Human Resources and Operational Development (HR&OD)**

It is the responsibility of the Head of HR&OD to review and update this policy and ensure an EIA is carried out on this policy.

### **Head of Departments, Sector Development Directors, Managers**

It is the responsibility of all Heads of Departments, Sector Development Directors, and Managers to:

- Ensure that their staff are aware of this policy.
- Ensure compliance with the policy.
- Notify and take advice from the Estates Department prior to any equipment being purchased, leased or rented that will require connection to the UHI Perth water infrastructure eg water features, pressure washers, hosepipes etc.
- Ensure that **NO** modifications/alterations to water systems are carried out unless approval is obtained from the 'Respective person'.

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- Act on any advice given by the Estates Department and Health, Safety and Wellbeing Adviser regarding Legionella bacteria control.

### **Head of Estates (Responsible Person)**

Head of Estates shall ensure:

- That the responsibilities of the 'DUTY HOLDER' as defined in the HSE's Approved Code of Practice (L8) are executed on behalf of UHI Perth within the Estates Departments undertaking.
- That this policy is brought to the attention of any contractors he/she engages to conduct UHI Perth business and is complied with.
- That contractors and sub-contractors under their control receive an UHI Perth Health and Safety Induction.
- That any work on UHI Perth water systems under their control will be undertaken using qualified, competent persons, with specific expertise on water systems, and that risk assessments, safe systems of work/method statements are in place prior to any works commencing, this includes works on existing systems and also new installations.
- That a legionella risk assessment complete with a written scheme is undertaken, adhered to, monitored and reviewed on a regular basis to ensure UHI Perth conforms with HSE's Approved Code of Practice (L8) on all UHI Perth premises under their control.
- That any concerns raised by the Water Hygiene Service Provider on current control measures are discussed and that any necessary actions are taken in a timely manner.
- That all Planned Preventative Maintenance work and remedial works undertake on UHI Perth water systems is carried out on time, to current specifications and is recorded in the Legionella risk assessment folder.
- In conjunction with the Water Hygiene Specialist ensure that the Legionella risk assessment and Written Scheme are kept up to date.
- Communication and coordination are maintained between all parties who work on UHI Perth water systems, plant and equipment, this includes Estates employed staff and contractors.
- That they take a lead role in the event of legionella outbreak situation and inform the Duty Holder of such an outbreak.
- That they notify the Health, Safety and Wellbeing Adviser and/or Human Resources Department, should any member of staff be involved in an incident of accidental Legionella exposure, in order that the appropriate advice can be given and action taken.

### **Human Resources**

Human Resources will:

- In conjunction with the Estates Department and Health, Safety and Wellbeing Adviser, identify and arrange training as is necessary.

- Notify the UHI Perth Occupational Health Provider should any member of staff be involved in an incident of accidental Legionella exposure, in order that medical advice can be given.

### **Occupational Health Provider**

The UHI Perth Occupational Health Provider will:

- Carry out health surveillance/health checks as agreed with HR.
- Advise the employee to attend their GP for referral onto specialists when necessary ie should a member of staff be involved in an incident of accidental Legionella exposure, in order that medical advice can be given.

### **Health, Safety and Wellbeing Adviser**

The Health, Safety and Wellbeing Adviser will:

- Advise the Estates Department on the suitability of contractors' risk assessments, method statements and contractors' competence.
- Provide advice and guidance on the application of the legislative requirements to employees when required.
- Where necessary, liaise with the enforcement authorities.
- Ensure that Legionella-related incidents are appropriately investigated and, where necessary, reported under RIDDOR; this may be in conjunction with Head of Estates.
- Monitor compliance with the requirements of this policy as deemed necessary.

### **All UHI Perth Employees**

- Shall familiarise themselves and comply with this policy.
- Shall report any concerns to their line management and/or the Estates Department relating to water systems or legionella risk.
- Shall not modify/alter or make additions to water systems, unless approval is obtained from the 'Responsible Person' via their Line Manager.
- Shall attend all training deemed necessary and act on such training proactively.

### **Students**

- Shall report any concerns to their PAT, lecturer, technician and/or the Health, Safety and Wellbeing Adviser/Estates Department relating to water systems or legionella risk.

## The Water Hygiene Service Provider

The Water Hygiene Service Provider is appointed by the 'Responsible Person' and is responsible for:

- Delivering a comprehensive water hygiene and control of Legionella bacteria service to ensure UHI Perth complies with the HSE's Approved Code of Practice (L8).
- Carrying out routine testing, monitoring, flushing and cleaning of all systems on a regular basis as agreed in the contract specification.
- Updating all existing risk assessments as required under the contract specification.
- Providing a water hygiene and control of Legionella bacteria records management system which complies with current regulations and the HSE's Approved Code of Practice (L8), as agreed in the contract specification.
- Agreeing and implementing prioritised corrective actions with the Responsible Person; and highlighting any concerns eg dead legs, failure of a control measure, or a legionella risk to the Estates Department in a timely manner.
- Ensuring that any persons under their control ie employees, sub-contractors etc that they instruct to work on the UHI Perth water systems will be suitably qualified, competent, with specific expertise on water systems, and that risk assessments, safe systems of work/ method statements are in place prior to any works commencing, and that they operate in accordance with UHI Perth Health and Safety standards, and all appropriate health and safety legislation.
- Failure to comply with this policy will mean immediate suspension of work activities until such time appropriate controls are in place.

### Contractors will:

- Ensure that any persons under their control ie employees, sub-contractors etc that they instruct to work on the UHI Perth water systems will be suitably qualified, competent, with specific expertise on water systems, and that risk assessments, safe systems of work/ method statements are in place prior to any works commencing, and that they operate in accordance with UHI Perth Health and Safety standards, and all appropriate health and safety legislation.
- Bring to the attention of the Estates Department any concerns that they may have with regards to the UHI Perth water systems eg dead legs, failure of a control measure, contaminated water system, legionella risk etc.
- People working with or on behalf of UHI Perth are also required to comply with this policy; failure to comply with this policy will mean immediate suspension of work activities until such time appropriate controls are in place.
- **Note:** The management of the Residences is outsourced to an external contractor, and so Residence Staff must meet the responsibilities within paragraph 5.11. The only exception being in the event of an emergency situation outside of normal UHI Perth opening hours, eg a leaking pipe, when

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they have a responsibility to inform the Estates Department of any emergency repairs as soon as possible.

### **The Head of Human Resources and Organisational Development**

Quality approval check of the policy is the responsibility of the Head of Human Resources and Organisational Development who will arrange for the policy to be posted on the website.

## **6 Linked Policies/Related Documents**

CoSHH Policy  
Health and Safety Policy  
Contractors Induction Form HS085  
BS 8580:2010 Water quality: Risk assessments for Legionella control  
BS8558:2011 Guide to the Design, Installation, Testing and Maintenance of Services Supplying Water for Domestic Use within Buildings and their Curtilages  
BS EN 806 (Parts 1-5) Specifications for installations inside buildings conveying water for human consumption.

### **HSE publications:**

Legionnaires' Disease – Technical Guidance – HSG274  
Legionnaires' Disease ACOP L8 4th Edition  
Legionnaires' Disease – A brief Guide for Duty Holders – INDG458

## **7 Relevant Legislation**

Health and Safety at Work etc Act 1974  
Control of Substances Hazardous to Health Regulations 2002  
Electricity at Work Regulations 1989  
Management of Health and Safety at Work Regulations 1999  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013  
Workplace (Health, Safety and Welfare) Regulations 1992  
Water Supply (Water Fitting) Regulations 1999