

WATER SAFETY POLICY

1. Policy

Keele University has a duty of care to visitors, students and staff to ensure a safe and appropriate environment for work and study.

The University accepts its responsibility under the Health and Safety at Work etc. Act 1974 and the Control of Substances Hazardous to Health (COSHH) Regulations (2002) [as amended]. In doing so, the University aims to take all reasonable precautions in respect to the management of water systems to control the risk of harm to visitors, students, staff and other persons working at or using its premises. Threats include infections caused by waterborne pathogens, scalding by hot water, chemically contaminated water and disruption to the water supply.

The University recognises the importance of a safe workplace with appropriate equipment and facilities as well as high standards of leadership, engagement, communication, training and competence and other management issues.

The management of water safety will be a continual commitment by the University involving regular management and progress meetings, and a commitment to a risk assessment programme.

Water Safety for the University shall be supported with adequate resources and suitably qualified, trained and competent staff to ensure the successful implementation of Water Safety Plan [WSP].

This Governance Policy is formally accepted by the Vice Chancellor and approved by University Council. The Vice Chancellor will do all that is reasonably practicable to comply with its requirements and will make the necessary resources available.

1.1. Purpose

The purpose of these policy arrangements is to safeguard all employees, contractors, tenants, visitors and assets through prevention and reduction of harm or loss. The aims of this policy are as follows:

- To set out a clear framework to protect all employees, contractors, tenants, and visitors by minimisation of the risks associated with waterborne pathogens.
- To identify correct practice for the safe operational management of water systems for staff to implement based upon nationally accepted guidance and the principle of “so far as reasonably practicable” [SFARP].
- To enable staff to understand their responsibilities in relation to these Policy arrangements and the overall Water Safety Plan.
- To establish arrangements for the monitoring and review of these Policy arrangements in order that it continues to reflect the most up-to-date legislation and guidance.
- To detail the process for version control, to ensure that out of date policy arrangements are archived and that the current version of the document is accessible to those who require it.

1.2 Scope

Keele University recognises its responsibility to ensure that the facilities it provides in its properties achieve the required standards for control of Legionella bacteria and other waterborne pathogens. Water quality is an area which has been the subject of much publicity and discussion, fuelled by recurring outbreaks of Legionnaires' Disease and an increasing awareness of the measures available to control and maintain acceptable standards.

The University accepts its responsibility to take every reasonable precaution as outlined in the current Health & Safety Executive's Approved Code of Practice L8 [including HSG274 Parts 1, 2 & 3] necessary to protect occupiers, users, and visitors within the vicinity of the campus.

These policy arrangements [within the University's broader Water Safety Plan] applies to all domestic-type hot and cold-water systems managed and operated by the organisation. It does not apply to other risk systems, including (list is not exhaustive):

- Evaporative cooling systems.
- Process water systems.
- Heating and ventilation systems.
- Water systems which are wholly contained within tenanted buildings or facilities.

These Policy arrangements apply to Keele University and all the organisation's employees [including those managed by a third party] on the campus.

The Policy arrangements apply to all employees, contractors and visitors associated with the University and should be read and implemented whenever water related risk management advice is required.

Legionnaires' Disease can prove fatal as confirmed by several cases, many of which could have been prevented. It is these preventative measures that Keele University wishes to address across its portfolio for the protection of students, staff, contractors, and visitors. The associated liability of such an outbreak, coupled with the public attention attached to even a suspected outbreak, necessitates the need for clear, concise guidelines to be published, recommending measures to be taken to prevent the Legionella bacterium becoming active within the buildings owned, managed, or maintained by Keele University.

Water services, in particular hot water service installations, humidifiers, cooling towers and air supply systems are the sensitive areas requiring scrutiny regarding maintenance methods and procedures. This has been emphasised by many studies of such services, and in available documentation relating to maintenance and monitoring of water systems.

In new, occupied or partially occupied buildings, special care must be taken as the circumstances may require bespoke solutions for circumstances encountered therein.

This Policy, together with Procedures and the associated documents and records, form Keele University's Water Safety Plan [WSP]. The plan has been developed to comply with the requirements of the Health & Safety Executive's Approved Code of Practice L8 [4th edition].

The content of the WSP includes management and governance arrangements, together with details of training, professional support, maintenance regimes and supporting documentation.

There are certain buildings on the University campus that are not under the direct control of the University including Caudwell Children, Stephenson Building, Alliance Medical, Marriot Hotel and Vets Practice. Assurances will be sought from 3rd party building managers that arrangements are in place to manage water safety within their buildings.

2. ROLES AND RESPONSIBILITIES

2.1 Statutory Duty Holder: Vice-Chancellor

Take overall responsibility to ensure that the Policy for the control of Legionella is implemented and that appropriate funding is made available, within budget submissions, to carry out any capital and revenue works. The Vice – Chancellor has a duty to appoint a Responsible Person (Water) who in practice carries out the day-to-day implementation of precautionary measures. The appointed RP will be provided with suitable time to ensure foreseeable water safety risks are managed appropriately.

2.2 Responsible Person (Water):

- Produce, develop, implement, and manage the Policy, its arrangements, and associated procedures.
- Ensure that up-to-date schematic drawings are available for all water systems.
- Identify and request the necessary resources / funding required implementing the precautionary measures and any improvement or alteration works necessary to comply.
- Assist in a formal audit of the procedures to ensure compliance on a regular basis, at least annually.
- Nominate an individual with managerial control of tasks within areas of the site NOT covered by the Appointed Contractor (e.g. Halls - shower cleaning and flushing low use outlets).
- Ensure that any action plans are reviewed & updated monthly.
- Chair the Bi-Monthly Water Safety Group Meetings.
- Ensure effective communication for the Duty Holder via Director of Estates & Campus Services on all aspects of Water Safety including Legionella.
- Ensure effective communication & management of all staff involved in the Legionella risk management programme, thus effecting full execution of any written scheme of precautions necessary to minimise the risk of Legionella proliferation in the areas under their control.
- Co-ordinate with Deputy RP in response to any investigation arising for non-compliant issues and for the ongoing development of the Estate.
- Ensure that all new or refurbished water systems handed over to Estates & Facilities are appropriately documented, commissioned, and signed off in accordance with the procedures document. Any issues arising with the control schemes will be reported to the relevant contractor / project team for resolution.
- Monitor the implementation and efficacy of these policy arrangements and the associated procedures document.
- Carry out the necessary actions defined in the procedures document should an outbreak situation associated with waterborne pathogens be suspected or confirmed.
- Liaise with external 3rd parties on matters of assurance.
- Be professionally responsible for water quality.
- Attend updated management training at least every three years, or sooner if determined by training needs analysis.

2.3 Deputy Responsible Person (Water):

- Assist in the development of Procedures documentation.
- Assist on water safety issues relating to all new & refurbishment projects.
- Support on the appointment of suitable contractors for water related installations are appointed for all projects.
- Ensure a risk assessment is carried out for all new & refurbishment projects, and that any actions emerging from the audit are assessed and implemented.
- Ensure adequate and consistent records are maintained throughout the University.
- Provide a training programme for on-site staff.
- Deputise for the RP(Water) when they are not available.

- Attend updated management training at least every three years, or sooner if determined by training needs analysis.

2.4a Planned Maintenance Manager

- Select and manage Appointed Contractor (Water).
- Ensure that risk assessments are reviewed when either alterations are made to the building water system or biannually.
- Attend updated management training at least every three years, or sooner if determined by training needs analysis.

2.4b Head of Capital Projects

- Ensure that risk assessments are carried out after any change or alteration to water systems.
- Attend updated management training at least every three years, or sooner if determined by training needs analysis.

2.5 Internal Auditing and Assessment – Head of Compliance & Performance

- Monitor compliance utilising Bi-monthly WSG reporting procedures and report on water safety at quarterly health and safety meetings.
- Spot checking of contractor quality and safety arrangements.
- Attend updated management training at least every three years, or sooner if determined by training needs analysis.

2.6 Monitoring of Operational Action Plans & Action Plan Improvements – Director of Estates & Campus Services

- Review Water Safety Policy documentation and operational action plans on a regular basis.
- Review Audit action Plans on a regular basis.
- Report status of compliance to various committees – Leadership team/ health & safety committee.

2.7 Appointed Maintenance Contractor (Water)

- Advise on potential areas of risk and identify where systems do not comply with current standards/guidance.
- Advise on the required controls and procedures for the prevention or control of Legionella risk.
- Operate and maintain the plant and systems on behalf of the University in accordance with its Policy and procedures for control of legionella.
- Ensure it maintains adequate records. (The University is responsible for maintaining its own records).
- Ensure that its staff (directly employed or contractors) are trained in the correct procedures and are aware of the standards required and expected of them in discharging their duties in compliance with the Policy for the minimisation of legionella risk.
- Maintain records of inspections, cleaning, disinfection and pasteurisation regimes, maintenance, alterations, repairs, and operational abnormalities.

2.8 Nominated Persons: Student Accommodation Services & Head of Mechanical & Electrical Maintenance

- Maintain an up-to-date list or management process to identify all rooms which remain unoccupied for 7 days or more - Student Accommodation Services.

- To ensure that the water systems in them are flushed weekly and this is recorded. - Head of Mechanical & Electrical Maintenance.
- Ensure that all shower heads and hoses are dismantled, cleaned and de-scaled on a three-monthly basis and that this is recorded. (Halls - Head of M&E responsible, actioned by Stewards. Academic Estate – Planned Maint. Dept. responsible, actioned by Water Contractor).
- Ensure adequacy of flushing regimes (Halls – Stewards, Academic – Water Contractor, Labs / Specialist spaces – Lab Techs.)

2.9 Directly Employed Staff (Including Agency Staff)

- Ensure that all staff engaged on the operation and maintenance of water plant and systems do so in accordance with the Policy for the minimisation of legionella risk and relevant codes of practice at all times.
- Comply with the standards and procedures laid down in these policy arrangements and associated procedures for the minimisation of water safety risks.
- Ensure that agency staff carries adequate insurance cover.

2.10 Contractors

All contractors employed by the University are responsible for ensuring that they and any sub-contractor reporting to them carry out their activities in a way which complies with the policy arrangements for minimisation of water safety risks.

Ensure adequate insurance liability cover is carried.

2.11 Contractors providing Risk Assessment

The Legionellosis risk assessment should be carried out by a trained and competent person. It is recommended that companies / individuals who carry out risk assessments should be members of the Legionella Control Association (LCA) and risk assessments be carried out in accordance with BS 8580-1:2019 Water Quality. Risk assessments for Legionella control.

2.12 Project Management Staff

Staff managing projects and any consultants appointed by them shall be responsible for the effective design and management of all capital schemes including appropriate and comprehensive commissioning which is to be agreed with the RP (Water) during the design stage. To comply with CDM Regulations, information about an existing system that is to be modified should be passed to the Building Surveyor, together with the operating criteria that have to be achieved for the system. This should detail installation and commissioning requirements. They will also be responsible for ensuring that plant and services are capable of meeting any increased demand where a system is extended and for the provision of as-fitted drawings at the time of handover, together with all commissioning data. More detailed and prescriptive project water safety information can be found within Part 2.1 of the University's Water Safety Plan.

2.13 Authorising Engineer

The Authorising Engineer Water (AEW) will remain independent of the University and remain independent of providing remedial services. The AEW will be appointed by the RP.

The AEW shall:

- Make recommendations for the appointment of the RP and DRP. Certificates of appointment will be issued detailing areas of responsibility and limitations;
- Advise and support the RP, DRP and other University staff with regard to positive water sample results as well as non-compliant issues identified;

- c. Undertake annual audits – to be shared with the WSG for review;
- d. Monitor ongoing performance status through reviewing verification records presented at the WSG;
- e. Review and identify changes needed to the WSP;
- f. Assist with risk assessment reviews;
- g. Attend the WSG meetings;
- h. Assist and advise on the delivery of training based on the training needs analysis.

2.14 All Staff

All staff members can affect water safety risk, as such they shall report any concerns, suspicions regarding the operation or performance of water systems that might increase the risk of waterborne pathogen proliferation i.e. little used outlets. Certain staff members may also be required to attend training sessions. Employees may be consulted regarding the assessment and control measures according to their role.

2.15 Tenants

Tenants are responsible for the safe operation of the water systems in their demised areas in accordance with their tenancy agreement. This includes:

- a) Water systems wholly contained within their demise.
- b) Water systems pipework, outlets and other components fed from University water systems.

Assurance must be provided on an annual basis to the University from the tenant that they are managing their water systems effectively, whether this be the whole building (e.g. IC4) or tenants with a tea point on a floor.

3. RELATED POLICIES AND PROCEDURES

The full suite of Water Safety Plan documentation is available from the Estates & Campus Services team.

Water Contingency Plan for an Alternative or Emergency Water Supply – Keele University.

Health and Safety Executive (2013). Approved Code of Practice and Guidance on Regulations. Legionnaires' disease: the control of Legionella bacteria in water systems. [L8]. [4th Edition].

Health and Safety Executive (2024). HSG274 Legionnaires' disease – technical guidance. Parts 1, 2 & 3.

4. REVIEW, APPROVAL & PUBLICATION

This policy is to be reviewed every 3 years by the Responsible Person Legionella, with approval from Deputy Director of Estate Services. Consultation during this review will be undertaken with teams in the Estate & Campus Services Directorate. This review will be uploaded to Policy Zone.

5. DOCUMENT CONTROL INFORMATION

Document Name	Water Safety Policy
Owner	Deputy Director – Estate Services, Estate & Campus Services
Version Number & Key Amendment	1.2
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