

Health and Safety Department

# Policy for the Management of Water Hygiene

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# University Facility Management

## Policy for Water Hygiene and Safety Management

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## 1. PURPOSE

This policy is designed to assist in the management of processes in accordance with the duties set out in the Loughborough University (LU) Water Safety Plan (WSP).

Specifically, this policy provides guidance and control measures for the installation, operation, maintenance, and annual examination of water systems excluding closed systems internally and externally installed across the Loughborough and London Campus.

## 2. SCOPE

This policy applies to all areas and installations on the Loughborough University sites (including Loughborough University London) for which Loughborough University is responsible for the installation, to conduct maintenance and arrange annual inspection.

This policy along with the WSP provides the guidance, instruction, specification, and infrastructure required for the implementation of the University's Management & Control program.

Specific guidance relating to Loughborough University and integral to this policy:

### [Approved WSP\2021\WSP Book 1 V2 - General Considerations](#)

- *Loughborough University Water Safety Plan Book 1 – General Considerations.  
A detailed guidance on risk, control, and documentation*

### [Approved WSP\2021\WSP Book 2 V2 - FM Services Management](#)

- *Loughborough University Water Safety Plan Book 2 – FM Services Management  
A detailed guide for the installation and maintenance of the estate*

### [Approved WSP\2021\WSP Book 3 V2 - Projects & Capital Management](#)

- *Loughborough University Water Safety Plan Book 3 – Projects and Capital Management  
A detailed guide for Project Managers to ensure compliance with the policy during capital delivery*

### [Approved WSP\2021\WSP Book 4 V2 - Contingency Measures](#)

- *Loughborough University Water Safety Plan Book 4 - Contingency  
A detailed guide on business continuity and actions to be taken should issues arise*

### [Approved WSP\2021\WSP Book 5 V1 - Associated Processes](#)

- *Loughborough University Water Safety Plan Book 5 – Associated Processes, Specs., Certs., & Permits  
All process and procedures for conducting tasks.*

### 3. REFERENCES

- Health and Safety at Work etc. Act 1974
- Control of Substances Hazardous to Health Regulation 2002.
- HSG 274. Legionnaires' disease technical guidance.
- Approved Code of Practice L8 The control of legionella bacteria in water systems.

### 4. DEFINITIONS

This document is a short form over-riding policy which must be read in conjunction with the Water Safety Plan. The WSP provides guidance, instruction, specification, and infrastructure for the implementation of the University's management & control program for:

The control of Legionella, hygiene, 'safe' hot water, cold water and drinking water systems.

Reference shall be made to the WSP for a full glossary of abbreviations.

### 5. RESPONSIBILITIES

#### 5.1 Organogram

The Organogram indicates the lines of responsibilities relating to this policy. This is a pictorial representation of the lines of communication.

[See Appendix 1](#)

#### **Duty Holder: VC / COO (senior person responsible):**

The Vice Chancellor (VC) or Chief Operating Officer (COO) is the Statutory Duty Holder and, as the senior person responsible, has overall accountabilities for all aspects of the management of health and safety in the university organisation.

#### **Responsible Person (DAP):**

A person appointed by Loughborough University who has managerial authority and responsibility for the control of the water hygiene health and safety legislation within professional services and to ensure compliance within the schools through the appointed deputies.

#### **Deputy Responsible Person (AP):**

A person, either employed by the university or another organisation, with the required knowledge, training, and experience, appointed by the Dean / Director in writing, to take managerial responsibility for the implementation of this policy and procedures for a specific area of health and safety legislation.

## 5.2 Individual Responsibilities

### ***Director of Estates / Dean of School will:***

Appoint and ensure the competency of the Responsible Person, by ensuring that the person has suitable ability, experience, training, and resources to enable them to conduct the role.

Check content and guidance of this policy.

Ensure that these documents are available and accessible for all persons with responsibilities under this policy.

Review effectiveness of this policy in consultation with the Responsible Person and the Health & Safety Manager.

### ***Deputy Responsible Person (AP) will:***

Review and propose updates to this policy when appropriate.

Communicate by whatever means suitable, information to the employees with regards to relevant information on the risks and control measures being undertaken.

Review and ensure compliance of the Water Safety Plan within their respective areas.

Attend appropriate reviews and forums.

### ***Responsible Person (DAP) will in addition:***

Undertake periodic review and ensure that an audit of this policy and associated procedures are undertaken. This review should also include the policy and procedures of other key department and tenants.

### ***Dept. / School Deputy Responsible Person (AP) will:***

Manage the day-to-day safe operation of the water system, ensuring checks are undertaken and that faults are acted upon. The logbook is completed, maintained, and retained and all work to the system carried out by or with the knowledge of FM.

### 5.3 Organisational Responsibilities

#### ***LU User Department / School / Associated Company will:***

Carry out the COSHH risk assessment that identifies suitable control measures and to monitor the effectiveness of any control measure associated with the water system.

Monitor and control infrequently used outlets to ensure flushing is introduced when normal frequent use is not possible.

Maintain a site wide electronic logbook for each system, containing schedules and forms to keep records of checking, maintenance, and repair.

Carry out assessment of control effectiveness at least annually; carry out any corrective action and record result in logbook.

#### ***Estates & FM Team will:***

Appoint suitably qualified Maintenance Contract Service providers to undertake periodic examination and test of all plant and equipment under the ownership of FM. This work may be transferred to the in-house resource subject to suitable and sufficient capability training.

Receive periodic thorough examination test reports / certificates and retain for 5 years

Advise dept. / schools when procedures / controls / supervision need improving or whenever there is a reason to suspect that they are no longer valid – i.e., when an area of the building is taken out of use, test results contain long lists of repairs and poor performance.

Ensure immediate action in response to out of specification results. Advise the department operating the system of the results and remedial actions to be undertaken.

Ensure that any remedial works undertaken is conducted on time, to specification and all data is recorded.

#### ***Contracted periodic testing and inspection, service provider or internal team will:***

Have a suitable and sufficient management structure to always ensure professional competence.

Ensure that all their personnel are competent, suitably trained, certificated, and experienced, and have the necessary equipment to carry out their duties.

Carry out thorough testing and examination in accordance with the Water Safety Plan.

Provide a documented electronic report for all testing, inspection, and repairs.

Inform the Estates & FM Team if physical access or operations cannot be completed

***Estates & FM / Project Managers will:***

Support schools / departments by providing technical advice on plant and equipment, following any risk assessment advice.

When completing new or modified installations all work shall be carried out in accordance with Book 3 of the WSP.

Check any modifications or changes to existing installations are carried out under the site change control process and that all associated drawings, risk assessments, and testing schedules are updated.

## 6. CONTROL PRINCIPLES

The control principles listed below are written to match the lifecycle of the systems, starting with design and installation, and finishing with decommissioning and removal.

### 6.1 Risk Management

It is the user department / school responsibility for the COSHH risk assessment that identifies suitable control measures and to monitor the effectiveness of any control measure associated with the water systems.

Risk assessments shall identify the required performance of the system to ensure effective containment of any hazardous bacteria.

The COSHH risk assessment shall be reviewed whenever there is reason to believe that it is no longer valid (e.g., due to changes in plant, equipment or new information about risks or control measures).

Loughborough University's Control of Substance Hazardous to Health policy defines the operational duty in broader detail along with the WSP.

The installation or refurbishment of any water system should be undertaken in accordance with latest HSE guidelines, ACoP L8, HSG 274, and the WSP.

Particular attention should be paid to the following:- appointment of suitable contractors, the design in accordance with regulations & guidance, appropriate installations for the system, the co-ordination of the works between FM, school, contractor, and health, safety & welfare of building users, employees, and contractors.

All installation works are to be managed by an engineering representative of Estates & FM. (FM Project Engineer / Manager or Engineer team).

### 6.2 Commissioning

On completion of the installation the system must be commissioned prior to handover and the risk assessment updated. The commissioning engineer will take measurements in accordance with relevant guidance and compare with design intent. The commissioning engineer will notify of any non-compliances. The results are to be recorded and presented to the FM Project Manager, with a copy given to the school / department and FM asset care team, as part of the Operating and Maintenance (O&M) manuals. This manual shall also include the risk assessment, schematic diagram of the system, records of installation and details of maintenance procedure.

Once the equipment has been commissioned and is ready for operational use, FM shall ensure that suitable and sufficient training is given to the receiving school / department by the installer of the equipment. This training will involve the department being briefed by the installer on the equipment, including what to do in the event of an emergency. Any relevant documentation, including drawings, capabilities of the system etc. shall also be provided to the department and it will be their responsibility to store this in a retrievable format.

### **6.3 Operation, checks and maintaining the water system**

There are several types of water systems in use throughout LU. Any training of end users (students, researchers, and technical staff etc.) in how to safely use the system shall be the responsibility of the school, and they shall induct / train end users accordingly and give people responsibility for:

- Maintaining the logbook for flushing.
- Daily, weekly, monthly checks as deemed necessary.
- Record findings and actions in the logbook.
- Identify problems and arrange repairs.
- Correcting deviations from correct way of working.
- Facilitating maintenance times for FM to maintain as required.

Full details are available in Books 1 & 2 of the WSP.

### **6.4 Periodic examination and testing**

Periodic examination and testing will be considered in three stages:

1. Thorough visual and structural examination
2. To measure technical performance.
3. Assess control effectiveness through chemical or temperature control.

All stages will normally fall under the Estates & FM Department and FM will set up and manage a contract with an independent service provider experienced in the testing and monitoring of such systems.

The schedule of inspection and testing is to comply with HSG 274, ACoP L8 and as detailed in the WSP with additional requirements as specified by Loughborough University in the contract document.

### **6.5 Alterations**

If the department wishes to alter any part of the water system, the authorised representative shall contact the Estates & FM team by initially contacting the FM Helpdesk and request a meeting to discuss their requirements. The department is not authorised to make any alterations themselves. Alterations are to be undertaken in accordance with the WSP

### **6.6 Decommissioning & Removal**

At the end of the lifespan of the water system, or when repairs or alterations to the system are prohibitively expensive, FM or the department shall agree a system upgrade plan. On completion of the refurbishment or system removal all risk assessments and maintenance documentation must be reviewed, modified, amended, and reissued.

### **6.7 Audit and Review**

The process shall be reviewed by the Water Safety Group on a regular basis. A periodic independent audit shall be undertaken by LU H&S department and by an external UKAS accredited body. Any discrepancies will be highlighted, and actions identified to address the issues, including making improvements to the process where necessary.

## **7. WATER MANAGEMENT DOCUMENTS**

### **7.1 Policy**

This policy is to be made available for the Estates & FM through the FM website and for departments / schools via LU H&S website.

Changes to the documents are to be made only by the Estates & FM Responsible Person and under approval of the Estates & FM Director and the Health and Safety Committee.

### **7.2 Examination and Test Results**

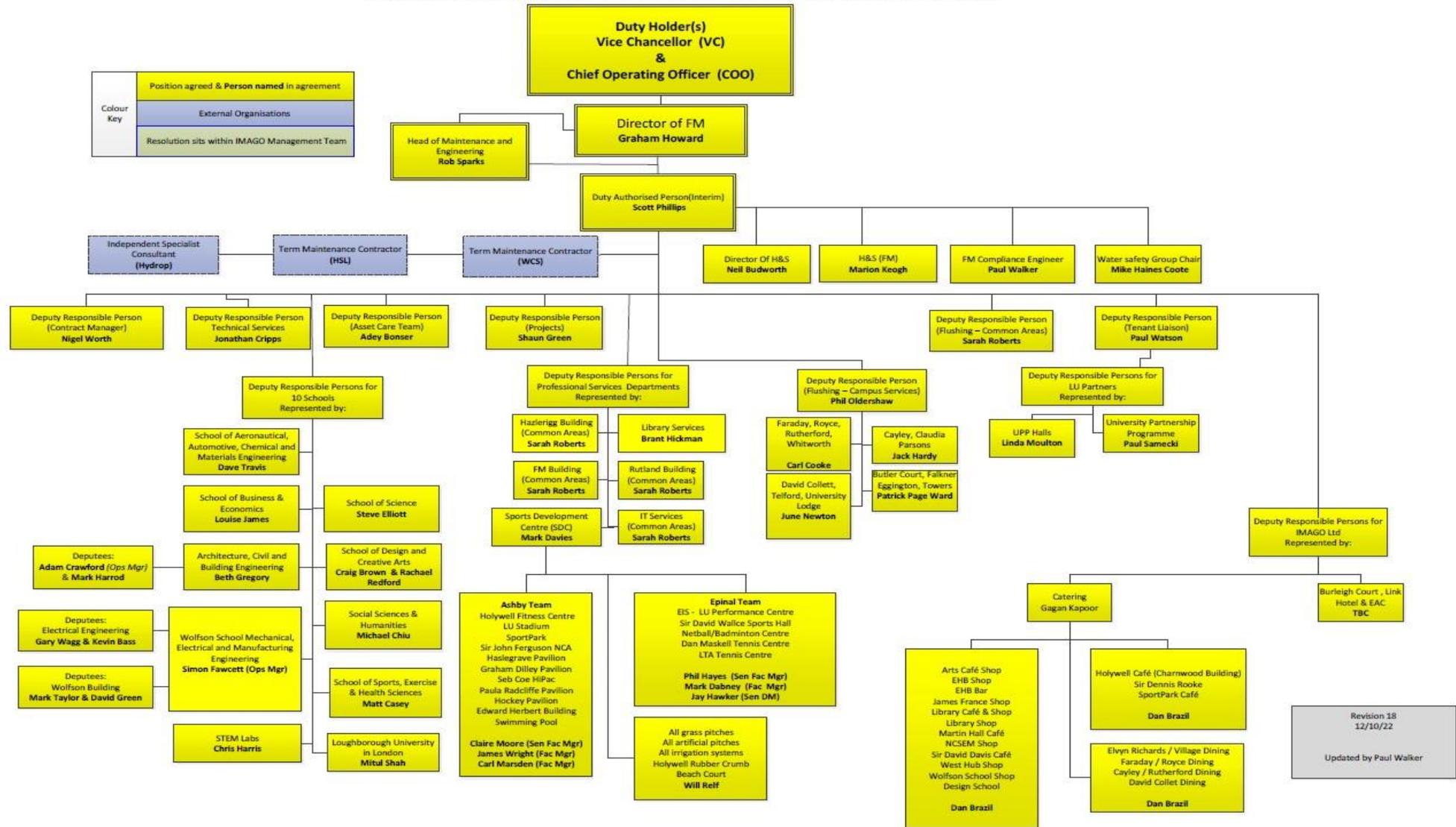
The maintenance and test reports are to be kept in electronic format on the FM portal with approved levels of access provided to the user department and school.

Reports will be kept for at least 5 years.

### **7.3 Checks and Maintenance Records**

The routine checks, maintenance and assessment of control effectiveness are to also be kept on the web portal. Records are to be kept for at least five years.

## Loughborough University Organisational Chart for Effective Legionella Control



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Updated by Paul Walker