

**Code of Practice**

---

# **UNIVERSITY WATER HYGIENE MANAGEMENT ARRANGEMENTS**

# Contents

1	Introduction.....	
2	Roles and Responsibilities.....	
2.1	Vice Chancellor of the University.....	
2.2	Director of Health and Safety .....	
2.3	Director of Estates .....	
2.4	Director of Operations (Estates) .....	
2.5	Head of Assurance, Risk and Property (Estates).....	
2.6	Heads of Department.....	
2.7	Head of Maintenance.....	
2.8	Estate Site Manager (Wellesbourne).....	
2.9	Building Facilities Managers.....	
2.10	Water Hygiene Manager.....	
2.11	Compliance Surveyor/s .....	
2.12	Operations Managers (Cleaning Responsibilities).....	
2.13	Project Manager, and Those who commission works.....	
2.14	Maintenance Staff / Estates Maintenance Staff.....	
2.15	Health and Safety Department.....	
2.16	Water Hygiene Framework Contractors.....	
2.17	University Gatehouse Security Staff.....	
2.18	Director of Sport and Active Communities .....	
2.19	All Members of Staff.....	
2.20	Code of Conduct for Contractors, Consultants and Suppliers.....	
2.21	University Water Safety Management Group .....	
3	Management Strategy (Water Safety Plan) .....	
3.1	Executive Summary.....	
4	Water Hygiene Training .....	
5	Arrangements for Leased and Rented Property and Property for Purchase or Disposal .....	
5.1	Leased in Properties .....	
5.2	Leased out Properties.....	
6	Arrangements for Off Campus Student Residential Building (Leasing Scheme).....	
7	Document Control .....	

## Appendices

Appendix 1 – Roles and Responsibilities Chart

Appendix 2 – Water Safety Plan

Appendix 3 – Training Matrix

Appendix 4 – Water Quality Management and Control Guidance Note 1

# 1 INTRODUCTION

The University attaches the greatest importance to the health, safety and welfare of staff, students and visitors. It is considered essential that management and staff should work together positively to achieve an environment compatible with the provision of the highest quality services to students where health hazards to students and others are minimised, so far as is reasonably practical.

The Health and Safety Commission's publication 'Legionnaire's Disease, The Control of Legionella Bacteria in Water Systems Approved Code of Practice and Guidance' (HSE L8) provides a framework and guidance for the University to achieve compliance relative to the hazards posed by poor water quality particularly where Legionella bacteria may be present.

It is accepted that it is for management and staff to do all that is reasonably practicable to achieve compliance with the HSE, and other regulations and guidance with regard to the maintenance of good water quality within all University premises. Where appropriate, training and information and any necessary control measures will be provided by the University. It is the intention of the University to ensure the effective implementation of this statement and to keep it under consideration in all aspects of health practice and decision-making, and this document describes how the University of Warwick are achieving this compliance.

This document has been produced to manage operational issues arising to comply with the University's Legionella and Water Quality Policy and the requirements of the L8 Approved Code of Practice.

The University of Warwick Legionella and Water Quality Policy as available on the university website and on the following link:

[https://warwick.ac.uk/services/healthsafetywellbeing/guidance/legionella\\_water\\_quality](https://warwick.ac.uk/services/healthsafetywellbeing/guidance/legionella_water_quality)

The Water Safety Plan (WSP) is a Procedural Document that has been communicated and signed off by the University Water Safety Management Group aimed at managing Water Quality including Legionella from a University 'Risk Management' perspective and used in conjunction with the University's Legionella and Water Quality Policy and other pertinent management documents.

This WSP provides the guidance, instruction, specification and infrastructure for the implementation of the University's Water Quality Management & Control programme including: The control of Legionella, hygiene, 'safe' hot water and cold water and drinking water systems. The WSP is available on the Estates Health, Safety and Wellbeing Pages on the following link:

[https://warwick.ac.uk/services/estates/h\\_and\\_s/water\\_hygiene/wsp/](https://warwick.ac.uk/services/estates/h_and_s/water_hygiene/wsp/)

Guidance can be found within section 6 of this document on the arrangements established for off campus residential accommodation that is leased out by the University under the terms of its leasing scheme. These management arrangements apply, to all building / parts of buildings under the control of the University.

The objective of the management arrangements is to protect students, employees, third party occupiers who may be at risk from legionnaire's disease.

## 2 ROLES AND RESPONSIBILITIES

Refer also to responsibility chart within Appendix 1

### 2.1 Vice Chancellor and the University

The vice chancellor of the University is Responsible for ensuring;

Adequate financial resources are made available to deliver the commitments set out in these arrangements.

### 2.2 Director of Health and Safety

The Director of Health and Safety is responsible for advising on the standards and regulations that must be achieved in order to meet legal requirements; for keeping the University's Health, Safety and Wellbeing website up to date with the related arrangements, instructions and guidance; and for ensuring that spot checks and audits are carried out and reported into the University's Governance structure.

### 2.3 Director of Estates – Duty Holder

The responsibility for ensuring legal compliance in managing water within the Estate rests with the Director of Estates to whom the Vice Chancellor has delegated the duty to manage, however all employees of the University have an obligation to assist in complying with that duty.

The Director of Estates, as Duty Holder for the implementation of these arrangements, instructions, written schemes and guidance and for ensuring that the necessary resources are available, with support from the Responsible Person.

The Director of Estates will work in conjunction with the Director of Health and Safety, the Head of Compliance and Assurance, the Director of Operations (the Responsible Person), the Head of Maintenance (the Deputy Responsible Person), and the Water Hygiene Manager to fulfil the latest version of the Water Safety Plan.

The Director of Estates will establish and resource a Compliance and Assurance Team who will be tasked with ensuring the day to day adherence to these arrangements and shall be a source of technical advice and guidance to other University staff and external contractors.

### 2.4 Director of Operations (Estates) – Responsible Person

Responsibility for planned preventative and reactive maintenance and testing of such systems rests with the Responsible Person (Director of Operations, Estates), supported by their respective managers. These responsibilities will be covered by the Head of Maintenance when required who will act as the Deputy Responsible Person.

### 2.5 Head of Assurance, Risk and Property (Estates)

The Head of Assurance, Risk and Property is responsible for ensuring that all resources required to administer these arrangements for the University are in place, for the delivery of Water Hygiene compliance as far as its in their control, and for reporting back to the Director of Estates and Director of Operations where any additional resources of any kind are required.

## 2.6 Heads of Department

Heads of Department must ensure that the principles and arrangements outlined within the following documentation will be actioned endorsed and supported throughout their areas of responsibility within the University.

All Heads of Department (including heads of all academic units such as Research Technology Platforms or similar and Directors/Heads of non-academic Departments) are responsible for the implementation of these arrangements within their respective Departmental areas and its communication to their staff, students and others under their control. Heads of Department must comply with the Legionella and Water Quality Policy and the associated arrangements, instructions, training and guidance on water hygiene management.

Heads of Departments are also responsible for ensuring the flushing of Infrequently Used Outlets and departmentally managed water systems, for example those related to research activities, in accordance with the relevant arrangements.

## 2.7 Head of Maintenance (Campus)

The Head of Maintenance is responsible for;

Ensuring up to date information relating to staff and agency workers within the maintenance teams are provided to the WHMT so that the required levels of training can be provided.

Ensuring that necessary trained and competent resources are available for Estates owned activities as defined within the plan(s) to carry out any planned cyclical servicing and testing works or regular planned maintenance. Work carried out on site should be completed by suitably trained operatives who have access to up to date Legionella Risk Assessments and information for the buildings in which the activities are to be carried out. Ensure all staff have suitable legionella awareness training to make decisions regarding the nature of those works with regard to water hygiene safety and the University arrangements.

The overarching responsibility for the Water Hygiene contract delivered through the Maintenance Team.

## 2.8 Estate Site Manager (Wellesbourne)

The Estates Site Manager (Wellesbourne) is responsible for;

Ensuring up to date information relating to staff and agency workers within the maintenance teams are provided to the WHMT so that the required levels of training can be provided.

Ensuring that any planned cyclical servicing and testing works or regular planned maintenance work is carried out by operatives who have access to up to date Legionella Risk Assessments and information for the buildings in which the activities are to be carried out and also have suitable legionella awareness training to make decisions regarding the nature of those works with regard to water hygiene safety and the University arrangements.

## 2.9 Building Facilities Managers

Building Facilities Managers are responsible for:

- Ensuring no work is undertaken in the building/s they are responsible for, unless the correct University procedures are followed prior to work commencing.
- Ensuring the Water Hygiene Management Team are aware of any new, alterations or modifications.

- Ensuring that any planned cyclical servicing, sampling and testing works or regular planned maintenance work is carried out by operatives who have received suitable Legionella awareness training to make decisions regarding the nature of those works with regard to water safety and the University arrangements.

## 2.10 Water Hygiene Manager

The Water Hygiene Manager is the technical Subject Matter Expert for water hygiene and legionella management and awareness and is responsible for:

- Overall management of the University Legionella Risk Assessments and providing information to relevant parties for closure in agreed formats.
- Coordinating the activities and recommendations that are made in Legionella Risk Assessments and ensuring that actions are either closed and evidenced within agreed timescales or escalated to the Responsible Person.
- The line management of the Water Hygiene Management Team – Compliance Surveyor/s.
- Ensuring effective water hygiene management arrangements are maintained as detailed in this document to ensure that appropriate measures of controlling the risks from Legionella are undertaken.
- Ensure that the Water Safety Plan is being complied with.
- Delivering training and providing up to date expert advice.

## 2.11 Compliance Surveyor/s

The Compliance Surveyor/s is responsible for;

- Support the Water Hygiene Manager.
- Undertake surveys, inspections and audits for hot and cold water systems and water features (including water testing and sampling).
- Undertake efficient auditing processes to ensure compliance.
- Identify and recommend areas where corrective action is required and ensure action is taken as appropriate.

## 2.12 Operations Managers (Cleaning Responsibilities)

The Operations Managers will be responsible for Producing and maintaining a list of all cleaning staff that will be supplied to the WHMT to ensure that the training identified as required for these roles is provided (see Appendix 3).

## 2.13 Project Managers, and Those who commission works

Project Managers and those who commission works are responsible for;

- Ensuring that the Water Safety Plan is complied with.
- Liaising with the WHMT to gain more information prior to the commencement of works.
- Provision of timely statutory documents ensuring necessary compliance activities have been completed. e.g. chlorination's

## 2.14 Maintenance Staff / Estates Maintenance Staff

The Maintenance Manager (Mechanical Services) and all directly Employed labour staff employed (and any agency employees within the directly employed labour teams) within the maintenance section will be required to comply with these arrangements and the Water Safety Plan.

## 2.15 Health and Safety Department

The Health and Safety Department will provide support to the Water Hygiene Manager to investigate the cause of any water hygiene incidents (having been provided with information from the WHMT) and give recommendations of any required actions.

## 2.16 Water Hygiene Framework Contractors

All contractors employed to deliver on water hygiene tasks will be required to comply with these arrangements and the Water Safety Plan.

## 2.17 University Gatehouse Security Staff

Staff working in the University Gatehouse (Security) Team who could receive reports of situations potentially fulfilling the criteria for instigating the Emergency Procedure must ensure that they follow the procedure and contact the relevant organisation and if necessary utilise the 24 hour 365 day emergency call out provision to mobilise Estates representatives or water specialists from the University framework contracts to attend site and make safe situations out of normal working hours.

## 2.18 Director of Sport and Active Communities

The Director of Sport and Active Communities is responsible for ensuring that the Swimming Pool is managed in line with HSE guidance, [Health and Safety in Swimming Pools - HSG179](#) and that the [Pool Water Treatment Advisory Group](#) (PWTAG) guidance is used as the standard to be achieved in the effective management of the Swimming Pool and when creating Operating Procedures.

## 2.19 All Members of Staff

All members of staff (including agency staff) must cooperate and comply with both the Legionella and Water Quality Policy and these associated arrangements, instructions and guidance on water hygiene management.

## 2.20 Code of Conduct for University Contractors, Consultants and Suppliers

The University Code of Conduct is a document produced for contractors undertaking works in any area of the University. The code makes reference to guidance and legislation issued by the Health and Safety Executive and has details relating to the University water hygiene arrangements; however it is the responsibility of contractors, sub-contractors, consultants and suppliers to ensure compliance with current best practice and legislation.

Link to Document -

[https://warwick.ac.uk/services/healthsafetywellbeing/guidance/contractors/management/contractor\\_code\\_of\\_conduct-v1.7\\_final\\_version\\_january\\_2019.pdf](https://warwick.ac.uk/services/healthsafetywellbeing/guidance/contractors/management/contractor_code_of_conduct-v1.7_final_version_january_2019.pdf)

The link below is to the University Contractors induction video.

<http://www2.warwick.ac.uk/services/healthsafetywellbeing/guidance/contractors/management/contractorinductionvideo/>

## 2.21 University Water Safety Management Group (UWSMG)

The University Water Safety Management Group provides a framework to ensure compliance for the co-ordination of activities related to the management, procurement, development, maintenance, training requirements and safe use of water systems in use within the University premises.

The purpose of the group is to raise the level of awareness and accountability for the use of water systems and endeavor to ensure that all policies, procedures and relevant guidelines are complied with and related standards are met. The remit of the group will include ensuring that the University plans strategically for developments associated with building and system changes or operational procedures that guarantee water quality, continuity and supply arrangements.

The University Water Safety Management Group is a multi-disciplinary committee that is involved with evaluation, assessment and involved with making decisions concerning water quality.

The Water Safety Management Group will have specific responsibility as per the agreed Terms of Reference that is available via the Estates Health, Safety and Wellbeing Pages via the link:

[https://warwick.ac.uk/services/estates/h\\_and\\_s/water\\_hygiene/uhwg/](https://warwick.ac.uk/services/estates/h_and_s/water_hygiene/uhwg/)

## 3 MANAGEMENT STRATEGY (Water Safety Plan)

### 3.1 Executive Summary

The aim of the Water Safety Plan (WSP) (refer to Appendix 2) is to describe the University's Policy for the management and control of 'Water Safety' incorporating *Legionella sp.*, "safe" hot water and "wet" ventilation systems in compliance with current guidelines (Model Engineering Specifications and Approved Codes of Practice), legislation, Water Supply Regulations and pertinent British Standards.

In addition, the developed WSP shall assist with understanding and mitigating risks associated with bacterial contamination of water distribution and supply systems and associated experimental equipment. It will provide a risk management approach to the microbiological safety of water and establish good practices in local water usage, distribution and supply.

This will serve to ensure that the WSP developed is suitable and sufficient in allowing the University to deliver the highest level of water safety across its estate:

- i. Development of Policy and Procedural Documents
- ii. Risk Assessments
- iii. Auditing Services
- iv. Training
- v. Log Book System Developments
- vi. Contingency Processes
- vii. Capital Works Project Design, Installation and Commissioning Process Verification

This WSP, ratified by the University Water Safety Group (UWSMG), shall apply to all premises whether owned or occupied by the University under lease or other SLAs. Where the management of buildings/areas occupied by University staff and/or patients is carried out by others, the requirements of the WSP shall remain applicable.



The documents listed below, as well as other pertinent guidance, may be referenced during the process:

- Health & Safety Commission Approved Code of Practice & Guidance 2013 - The Control of Legionella bacteria in water systems (L8)
- Health and Safety Executive Legionnaires' disease: Technical guidance HSG274 Part 1 - The control of legionella bacteria in evaporative cooling systems:2013
- Health and Safety Executive Legionnaires' disease: Technical guidance HSG274 Part 2 - The control of legionella bacteria in hot and cold water systems:2014
- Health and Safety Executive Legionnaires' disease: Technical guidance HSG274 Part 3 - The control of legionella bacteria in other risk systems:2013
- BS 8580:2019 - Water Quality - Risk assessments for Legionella Control - Code of Practice
- The Water Supply (Water Quality) Regulations 2018
- The Water Supply (Water Fittings) Regulations 1999
- The Water Regulations Advisory Scheme's (WRAS) 'Water Regulations Guide', and any other requirements of the local water undertaker
- BS7592:2008 - Sampling for Legionella bacteria in water systems - Code of practice
- World Health Organisation (WHO) - Water Safety in buildings: 2011

## 4 WATER HYGIENE TRAINING

The University will ensure that all relevant staff who have responsibilities outlined in these arrangements will receive the appropriate level of training.

Legionella awareness training provided to employees whose work could foreseeably expose them to legionella or who supervise or influence the work.

The training to be delivered to these identified categories of staff is set out in the Legionella Training Matrix (see Appendix 3) and shall take the form of either classroom based sessions or e-learning / Moodle courses (the type of delivery is to be decided by the Water Hygiene Manager).

It will be the responsibility of the Heads of Department to ensure that training arrangements are in place so that the names of any qualifying staff members appointed within their area are provided to the Water Hygiene Manager in order to arrange the appropriate training."

It is a requirement that staff appointed into a post listed on the Water Hygiene Training Matrix as requiring full awareness training (see Appendix 3)

## 5 ARRANGEMENTS FOR LEASED AND RENTED PROPERTY AND PROPERTY FOR PURCHASE OR DISPOSAL

The University will adopt the following measures for managing its leases that do not form part of the off campus student accommodation leases.

### 5.1 Leased in Properties

- Any property acquired on Full Repairing Lease is to be treated as University owned property.
- No new property may be occupied for or on behalf of the University until an L8 Risk Assessment is confirmed by the examination of existing records for the property by the Water Hygiene Manager.

- If such records do not exist, or cannot be made available, an L8 Risk Assessment and report compliant with current HSE guidance will be required by the University and a charge may be made to the building owner for its production.
- All identified activities within any building will be subject to a formal L8 risk assessment. Any recommended remedial actions to be carried out in accordance with the risk assessment as outlined within the Tenancy agreement.

The potential problems in future occupancy and management of the property should be carefully considered before entering into an agreement to purchase or occupy the building.

## 5.2 Leased out Properties

- Where a building is let on a full repairing lease basis then all work required will be recorded as being the responsibility of the tenant for the duration of the lease (unless otherwise stipulated within the lease agreement)
- As a condition of the signed lease agreement it will be required that the University (having agreed convenient access) carries out a regular onsite landlord inspection to ensure that all agreed measures are in place with respect to tenant obligations.

## 6 ARRANGEMENTS FOR OFF CAMPUS STUDENT RESIDENTIAL BUILDING (LEASING SCHEME)

Buildings which are part of the Off Campus Leasing scheme which is managed by the University shall have the following arrangements in place for safe water hygiene management.

The following wording will be included within the Head Tenancy Agreement with Landlords (either existing or newly entering into the scheme) to outline the Universities requirements with regard to water hygiene management.

*Before the start of the letting period the Owner will, on request, provide the University with a L8 Risk Assessment for the building. The University reserves the right to require that any remedial actions that could present a risk to the health of students are treated as specified in the L8 risk assessment prior to accepting the property.*

## 7 DOCUMENT CONTROL

Document Control			
Version Number	Date issued	Author	Update information
v1	25/03/2021	Andrew Clews	Initial version of document
v1.1	24/11/2021	John Brandist	Specific arrangements and responsibilities for the swimming pool added (Chapter 2.18 & Appendix 3)
Owner: Andrew Clews, Water Hygiene Manager			Authorised By: John Phillips, Director of Health & Safety
Source Location: M:\SF\OCH 2006\Management System\02 Develop and Implement Controls\04 SOPs and COPs(B5)\14 Water Hygiene			Approval Date: 24/11/2021
Published Location: <a href="#">Web Page</a>			Review date: November 2022

# Appendix 1 - Roles and Responsibility Chart

## Universities Water Hygiene Responsibilities Chart

Vice- Chancellor

Refer to the University of Warwick Organisation for Safety  
(taken from the University Health and Safety Policy)

**Duty Holder – Director of Estates** implementation of the Water Quality and Legionella Policy, related arrangements, instructions, written schemes and guidance and for ensuring that ACOP L8 is adhered to and the necessary resources are available.,

**Responsible Person – Operations Director** Has responsibility for planned preventative and reactive maintenance and testing, supported by **Head of Maintenance**

**Capital Projects Director**  
Responsible for the design, installation and commissioning and handing over of domestic and non-domestic hot and cold water systems within University Buildings and Facilities that are subject to ACoP L8.

**Chief Finance Officer**  
Responsible for ensuring budgets are proportionate to the task in delivering maintenance and operational activities identified within the Legionella and Water Hygiene Risk Assessments

**Heads of Departments**  
Responsible for ensuring the safe use of all water supplies within the areas under their control and for reporting to the Duty Holder any concerns relating to legionella proliferation and the contamination of water systems.

**University Water Safety Management Group Chaired by Head of Compliance and Assurance** Provides a forum in which stake-holders will work together in a constructive way to meet the agreed aims and objectives within the terms of reference that reports to the Estates Strategic Health and Safety Committee.

**The Terms of Reference is located here:** [https://warwick.ac.uk/services/estates/h\\_and\\_s/meeting\\_minutes/uwhg](https://warwick.ac.uk/services/estates/h_and_s/meeting_minutes/uwhg)

**Water Hygiene Manager** Provides support to Duty Holder, Responsible Person and University Water Safety Management Group Chair. Appointed as the competent person on water hygiene management. Provides specialist advice to Estates and departments across the University, organises and delivers legionella awareness and procedural training, manages consultants and contractors and oversees the ongoing management and review of the Water Safety Plan, to ensure that the information recorded is accurate and up to date in line with the University's, policies and procedures.

## Appendix 2 - Water Safety Plan

The Water Safety Plan is located on the Estates Water Hygiene Pages by following the link:

[https://warwick.ac.uk/services/estates/h\\_and\\_s/water\\_hygiene/wsp/](https://warwick.ac.uk/services/estates/h_and_s/water_hygiene/wsp/)

## Appendix 3 - Training Matrix

The University recognises the legal obligation to provide adequate training to Staff and to review their awareness and competency for the required tasks.

Director of Estates: Attend a Legionella Quality and Water Management – Governance requirements Course at least once every 3 years.

Director of Operations Responsible Persons and Water Hygiene Manager: Attend formal Responsible Persons training and at least attend the refresher training every 2 years thereafter.

Specialist training will be arranged as required i.e. Legionella Risk Management - Project Management (Capital Works) as Directed by the Water Hygiene Manager, Director of Estates and Director of Operations.

Other Responsibilities: The following job roles will have to have attended City and Guilds Legionella Awareness training at least once every 3 years.

- Head of Maintenance
- Site Manager at Wellesbourne
- Campus Cleaning Services Manager and Supervisors
- Building Facilities Managers and those that carry out a building facilities type role
- Head of Compliance and Assurance
- Compliance and Assurance Team

For works undertaken by the Campus Cleaning Services, Maintenance and Facilities teams, the relevant Director / Director of Estates, or appointed representative, will undertake an assessment of training requirements associated with the level of works to be undertaken. Where there is a recognised risk, only staff that are trained for the task will be appointed to undertake the task, and shall follow the procedures set-out in the Universities procedures.

Operators of swimming pool plant must complete the National Pool Plant Operators Certificate:

[National Pool Plant Operators Certificate with Institute of Swimming | Royal Life Saving Society UK \( RLSS UK \)](#)

Contractors and Consultants: External Contractors and Consultants will be required to demonstrate that their staff are adequately trained

## Appendix 4 - Water Quality Management and Control Guidance Note 1

[https://warwick.ac.uk/services/estates/h\\_and\\_s/water\\_hygiene/whg/flushing\\_little\\_used\\_outlets\\_technical\\_guidance\\_note\\_1\\_v2\\_final\\_250119.pdf](https://warwick.ac.uk/services/estates/h_and_s/water_hygiene/whg/flushing_little_used_outlets_technical_guidance_note_1_v2_final_250119.pdf)