

## Legionella and Water Quality Policy

The University recognises that the management of water hygiene is essential to safeguard anyone who attends and uses the facilities managed by the University from hazards associated with water systems. The policy is to control risks from scalding, drinking water quality, legionellosis, pseudomonas aeruginosa (and other water-borne pathogens, which can cause serious illness, including Legionnaires' disease), which is a potentially fatal pneumonia caused by legionella bacteria.

This Policy applies across all University campuses, including Gibbet Hill, Westwood and Wellesbourne, and applies to:

- Cooling systems with cooling towers, evaporative condensers or dry/wet cooling systems
- Hot and cold water systems
- Spa pools
- Other plant and systems containing water that can create and increase the risk from bacteria during operation or when being maintained.

This Policy is supported by arrangements including, the University Water Safety Plan, University Code of Practice, risk assessments, written schemes, and, instructions that are based on, latest guidance on water hygiene management and are available on the University's Health, Safety and Wellbeing website.

Under the provisions of Regulation 26, Safety Regulations and associated University Health and Safety Policy document, it is the duty of all staff, students and others working in the University to comply with this Policy, together with any other instructions, rules and guidance that may apply.

### **Bacteria (including Legionella), Pseudomonas Aeruginosa and other water-borne Pathogens**

Illness and disease can occur from exposure to bacteria and pathogens, usually in airborne water droplets, mists or vapours, generated from water systems. The propagation of bacteria and pathogens is enhanced by the following conditions:

- The water temperature in all or part of a system may be between 20°C and 45 °C
- It is possible for water droplets to be produced and if so, they can be dispersed
- Systems in which water is stored and/or re-circulated
- Situations where bacteria growth is supported by the presence of biofilms and other organic material, scale, rust or sludge which provide nutrients to the bacteria.

In addition, risk of illness from the conditions given increases relative to the susceptibility of the individuals exposed to the bacteria.

### **Core Principles**

The Duty Holder must appoint a Responsible Person (RP) and Deputy Responsible Person(s) (DRP). The RP/DRPs are charged with implementing written schemes to control the risk of Legionella within systems.

identified by the Risk Assessment within the University. The RP/DRPs will monitor and review the effectiveness of the written schemes.

Arrangements such as the water Safety Plan defines how the Duty Holder manages potential risk from exposure to water-borne bacteria in accordance with current legislation, guidance and good practice by:

- Identifying and assessing sources of risk.
- Preparing a written scheme for the control of the identified risks.
- Ensuring that suitable and sufficient staff, training and financial resources are available.
- Implementing, managing and monitoring all control measures identified within the written schemes.
- Keeping up to date electronic records.

This Policy is supported by arrangements such as the Code of Practice for Water Hygiene Management and the written schemes of control measures that provides further clarification on roles and responsibilities, lines of communication and also details the practical implementation of this policy.

There are also other written arrangements in place relating to general water hygiene and testing requirements, including, but not limited to, arrangements to ensure the safety and quality of drinking water available from taps, dispensers, fountains or other outlets.

## **Responsibilities**

The Vice-Chancellor is ultimately accountable, however responsibility is delegated to the Director of Estates, as Duty Holder, for the implementation of this Policy, related arrangements, instructions, written schemes and guidance and for ensuring that the necessary resources are available, with support from the Responsible Person and the Deputy Responsible Person.

Responsibility for the design, installation and commissioning of water systems such as hot and cold-water systems rests with the Capital Programme Director, Estates. Responsibility for planned preventative and reactive maintenance and testing of such systems rests with the Responsible Person (Director of Operations, Estates), the Deputy Responsible Person and supported by their respective managers.

Heads of Departments, in conjunction with 'Building Managers', are responsible for the implementation of the elements of this Policy as related to their respective Departments, and its communication to their staff. They are also responsible for ensuring the flushing of little used outlets and departmentally managed water systems, for example those related to research activities, in accordance with the relevant arrangements. All staff must comply with this Policy and the associated arrangements, instructions, training and guidance on water hygiene management. Heads of Departments are also 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 bacteria and the contamination of water systems.

The University Water Hygiene Manager is responsible for supporting the Director of Estates (Duty Holder) and other persons with responsibility through the provision of professional advice and auditing of the relevant arrangements.

The University Strategic Water Safety Management Group supported by the Technical Water Safety Group provides a forum in which stakeholders will work together in a constructive way to meet the agreed aims and objectives within the terms of reference and reports to the University Health and Safety Executive Committee.

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, training and guidance; and for ensuring that spot checks and audits are carried out and reported.

The Head of Assurance, Risk and Property is responsible for carrying out 'second line' audit spot checks of work and records, escalating any issues to the Director of Estates, Director of Operations, Estates and the Director of Health and Safety.

## Review

This policy will be reviewed when any legal requirements change or at least once every three years.

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