

Reference Number: UHB 369
Version Number: 1

Date of Next Review: 25 April 2020
Previous Trust/LHB Reference Number:
UHB 091

Water Safety Policy

Policy Statement

To ensure the Health Board delivers its aims, objectives, responsibilities and legal requirements transparently and consistently, we will implement operate and manage an effective Water Safety Policy and associated Water Safety Plan, procedures and protocols in accordance with all UK Health and Safety law and associated guidance and approved codes of practice.

In conjunction with the University Health Board's Water Safety Plan and associated procedures and protocols for the Control of Water Safety, this Water Safety Policy sets out how the risks from microbiological and scalding hazards associated with the supply and use of water are assessed, managed and controlled.

Patient exposure to waterborne microorganisms occurs through a variety of sources, including:

- Inhalation of aerosols and breathable water droplets.
- Drinking water.
- Ingestion of ice.
- Ingestion of food prepared using water.
- Skin contact through washing, bathing (inc use of pools) and showering.
- Contact with endoscopes and medical instruments.
- Contact with others (staff, visitors and other patients).

Effective management of water safety is a key aspect of the Health Board's strategy to protect the health of patients, visitors and staff in accordance with UK health & safety law. This Water Safety Policy has been written to direct staff to all applicable practical guidance so that the aims and objectives of this Policy can be implemented operationally.

Policy Commitment

Commitment

Cardiff And Vale University Health Board, hereinafter known as the UHB, accepts responsibility under the Health and Safety at Work Act etc. 1974 and the Control of Substances Hazardous to Health Regulations 2002 (as amended), to take all reasonable precautions to prevent or control the harmful effects of contaminated water) to residents, patients, staff and other persons working at or using its premises.

The aim of this Policy is to introduce to the UHB, a structured Procedure and Reporting

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Schedule, for Water Safety Management in compliance with current Guidelines (HTMs, HGNs and Model Engineering Specifications), legislation and Water Supply Regulations.

UHB will undertake to:

- i. identify and assess sources of risk and undertake risk assessments
- ii. Establish a Water Safety Group having responsibility for Water Safety Management for the UHB
- iii. prepare a Water Safety Plan for preventing, reducing or controlling the risk including all associated procedures, protocols and instructions ;
- iv. Operationally implement all procedures and protocols and manage precautions;
- v. Maintain appropriate records for the management of water safety
- vi. Appoint Authorising Engineer (Water Safety) for the UHB

Water Safety Group

A Water Safety Group will be established which will have responsibility for Water Safety within the UHB. The group will be chaired by the Director of Infection Prevention and Control (DIPC) and shall meet on a quarterly basis. The Water Safety Group (WSG) is a multidisciplinary group formed from the many departments in this University Health Board with collective and individual responsibilities for the safe provision and use of water. In order for the WSG to function, the following membership must be an integral part of the group and attend regular meetings as well as carry out appointed actions:

- Director of infection prevention and control (DIPC);
- Senior IPC nurse and other members of the IPC team as appropriate;
- Consultant medical microbiologist;
- Food, Water & Environmental Laboratory Representative;
- Senior Operational Manager (SOM) (Estates and Facilities);
- Appointed Responsible Person (Estates and Facilities);
- Authorised Person AP (Water) (Estates and Facilities);
- Authorising Engineer AE (Water);
- Hotel Services Manager;
- Senior nurses from relevant augmented care areas and Clinical Boards
- Senior representative from Sterile Services;
- Estates management representative from Cardiff University;
- Members of relevant external organisations

Water Safety Plan

A Water Safety Plan will be prepared and implemented by the Water Safety Group which will operationally deliver the statement and commitments in this policy. The plan will include procedures and protocols for all departments and stakeholders to adopt for Water

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Safety throughout the UHB. The WSP shall be reviewed annually unless required otherwise. The WSP includes management procedures and protocols on the following disciplines/topics and the should be consulted for further information:

1. Document Control
2. Introduction
3. Glossary of Terms
4. Role of the Water Safety Group
5. Scope
6. Augmented Care
7. Departmental Roles & Responsibilities
8. Risk Management Principles
9. Risk Assessment
10. Design Construction of Water Systems
11. Controlling the Risks from Legionella
12. Controlling the Risks from *Pseudomonas Aeruginosa*
13. Controlling the Risks from Other Microbiological Pathogens
14. Controlling the Risks from Scalding with Hot Water
15. Provision of Safe Drinking Water
16. Water Used in the Preparation of Food and Drink
17. Water Quality – Sampling & Analysis
18. Competence
19. Record Keeping
20. Incident Management
21. Audit & Review

List of Appendices & Associated Documents

[New Flushing Record](#)
[Identifying and Flushing Little Used Outlets](#)

The Estate

For the purposes of this Code of Practice, the Estate comprises all the buildings currently owned or occupied (under a full maintenance lease or otherwise) by the UHB. A full list of properties/buildings and status of occupation is available from the Capital Estates and

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Facilities Service Board.

Roles and Responsibilities

The WSP details roles and responsibilities as follows:

- Departments
- Individual Positions/Roles
- Training and Competence

Resource Implications

The necessary resources for the maintenance, management, training, risk assessments, monitoring and auditing of performance of Water Management and Control are already in place, as an integral part of the Capital Estates and Facilities Service Boards budgetary allocations, and the implementation of this policy will not entail additional expenditure.

There may be a requirement for Water Safety schemes/initiatives arising from the regular risk assessment process or other assessments. Representation will be made for the funding of these schemes at the appropriate time.

Supporting Procedures and Written Control Documents

The following documents should be read in conjunction with this Policy

- Water Safety Plan
- Health & Safety Executive (2013) Legionnaires' disease; The control of Legionella bacteria in water systems, Approved Code of Practice & Guidance on Regulations (L8)
- Health & Safety Executive (2014) Legionnaires' disease; Part 2 The control of Legionella bacteria in hot and cold water systems (HSG 274 Part 2)
- Health & Safety Executive (2013) Legionnaires' disease; Part 3: The control of Legionella bacteria in other risk systems (HSG 274 Part 3)
- Department of Health (2006); Water Systems Health Technical Memorandum 04-01: The Control of Legionella, hygiene, "safe" hot water, cold water and drinking water Part A: Design, Installation & Testing
- Department of Health (2006); Water Systems Health Technical Memorandum 04-01: The Control of Legionella, hygiene, "safe" hot water, cold water and drinking water Part B: Operational Management
- Department of Health (2006); Water Systems Health Technical Memorandum 04-01: Addendum; *Pseudomonas Aeruginosa* – advice for augmented care units
- Department of Health (2009); Water Systems Health Technical Memorandum 01-05: Decontamination in primary care dental practices
- National Health Service (1997); Model engineering specifications D08 Thermostatic mixing valves (Healthcare Premises)
- British Standards Institute (2011): BS8558:2011 Guide to the design, installation,

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testing and maintenance of services supplying water for domestic use within buildings and their curtilages – Complimentary guidance to BS EN 806

- British Standards Institute (2010): BS8580:2010 Water Quality – Risk assessments for Legionella Control – Code of Practice
- British Standards Institute (2008): BS7592:2008 Sampling for Legionella bacteria in water systems – Code of Practice
- NHS Estates (1998); 'Safe hot water and surface temperatures; Health Guidance Note
- Thermostatic Mixing Valve Manufacturer's Association (2000); Recommended Code of Practice for Safe Water Temperatures
- Department of Health (2013); Health Building Note 0-09 Infection Control in the Built Environment
- Chartered Institution of Building Services Engineers (2013); TM13:2013 Minimising the risk of Legionnaires' disease

Scope

This policy applies to all of our staff and all buildings/locations including those with honorary contracts

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| Equality and Health Impact Assessment | An Equality and Health Impact Assessment (EHIA) has been completed and this found there to be a no impact. |
| Policy Approved by | Health and Safety Committee |
| Group with authority to approve procedures written to explain how this policy will be implemented | Water Safety Group |
| Accountable Executive or Clinical Board Director | Director of Planning |

Disclaimer

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the [Governance Directorate](#).

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| Summary of reviews/amendments | | | |
|--------------------------------------|-----------------------------|-----------------------|--|
| Version Number | Date Review Approved | Date Published | Summary of Amendments |
| 1 | 25/04/2017 | 27/10/2017 | Replaces the previous Control of Legionella Policy UHB 091 |
| 2 | | | |
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Equality & Health Impact Assessment for

WATER SAFETY POLICY

Please read the Guidance Notes in Appendix 1 prior to commencing this Assessment

Please note:

- The completed Equality & Health Impact Assessment (EHIA) must be
 - Included as an appendix with the cover report when the strategy, policy, plan, procedure and/or service change is submitted for approval
 - Published on the UHB intranet and internet pages as part of the consultation (if applicable) and once agreed.
- Formal consultation must be undertaken, as required¹
- Appendices 1-3 must be deleted prior to submission for approval

Please answer all questions:-

| | | |
|----|---|--|
| 1. | For service change, provide the title of the Project Outline Document or Business Case and Reference Number | NA |
| 2. | Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details | Director of Planning |
| 3. | Objectives of strategy/ policy/ plan/ | To ensure the Health Board delivers its aims, objectives, responsibilities |

¹http://www.cardiffandvale.wales.nhs.uk/portal/page?_pageid=253,73860407,253_73860411&_dad=portal&_schema=PORTAL

| | | |
|-----------|---|---|
| | <p>procedure/ service</p> | <p>and legal requirements, the UHB will implement operate and manage an effective Water Safety Policy and associated Water Safety Plan, in accordance with all UK Health and Safety law and associated guidance and approved codes of practice.</p> <p>The aim of this Policy is to introduce to the UHB, a structured Procedure and Reporting Schedule, for Water Safety Management in compliance with current Guidelines (HTMs, HGNs and Model Engineering Specifications), legislation and Water Supply Regulations.</p> |
| <p>4.</p> | <p>Evidence and background information considered. For example</p> <ul style="list-style-type: none"> • population data • staff and service users data, as applicable • needs assessment • engagement and involvement findings • research • good practice guidelines • participant knowledge • list of stakeholders and how stakeholders have engaged in the development stages • comments from those involved in the designing and development stages | <ul style="list-style-type: none"> • Legislation, Guidance and Approved Codes of Practice detailed in Policy • UHB Water Safety Plan • Water Safety Group, Capital Estates and Facilities and Infection Prevention and Control have been consulted and have contributed to the Water Safety Plan and this Policy |

| | | |
|-----------|--|--|
| | Population pyramids are available from Public Health Wales Observatory ² and the UHB's 'Shaping Our Future Wellbeing' Strategy provides an overview of health need ³ . | |
| 5. | Who will be affected by the strategy/ policy/ plan/ procedure/ service | All patients, visitors, staff and stakeholders who visit or use UHB premises and water systems |

² <http://nww2.nphs.wales.nhs.uk:8080/PubHObservatoryProjDocs.nsf>

³ <http://www.cardiffandvaleuhb.wales.nhs.uk/the-challenges-we-face>

6. EQIA / How will the strategy, policy, plan, procedure and/or service impact on people?

Questions in this section relate to the impact on people on the basis of their 'protected characteristics'. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate |
|---|--|---|---|
| <p>6.1 Age For most purposes, the main categories are:</p> <ul style="list-style-type: none"> • under 18; • between 18 and 65; and • over 65 | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |
| <p>6.2 Persons with a disability as defined in the Equality Act 2010 Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes</p> | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate |
|---|--|---|---|
| <p>6.3 People of different genders: Consider men, women, people undergoing gender reassignment</p> <p>NB Gender-reassignment is anyone who proposes to, starts, is going through or who has completed a process to change his or her gender with or without going through any medical procedures. Sometimes referred to as Trans or Transgender</p> | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |
| <p>6.4 People who are married or who have a civil partner.</p> | There will be enhanced management associated with Water Safety and associated | NA | NA |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate |
|---|---|---|---|
| | control measures | | |
| <p>6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding. They are protected for 26 weeks after having a baby whether or not they are on maternity leave.</p> | <p>There will be enhanced management associated with Water Safety and associated control measures</p> | <p>NA</p> | <p>NA</p> |
| <p>6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers</p> | <p>There will be enhanced management associated with Water Safety and associated control measures</p> | <p>NA</p> | <p>NA</p> |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate |
|--|---|---|---|
| <p>6.7 People with a religion or belief or with no religion or belief. The term 'religion' includes a religious or philosophical belief</p> | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |
| <p>6.8 People who are attracted to other people of:</p> <ul style="list-style-type: none"> • the opposite sex (heterosexual); • the same sex (lesbian or gay); • both sexes (bisexual) | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |
| <p>6.9 People who communicate using the Welsh language in terms of correspondence, information leaflets, or service plans and design</p> | There will be enhanced management associated with Water Safety and associated control measures. Welsh translations will be provided | NA | NA |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate |
|---|--|---|---|
| Well-being Goal – A Wales of vibrant culture and thriving Welsh language | as appropriate | | |
| 6.10 People according to their income related group: Consider people on low income, economically inactive, unemployed/workless, people who are unable to work due to ill-health | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |
| 6.11 People according to where they live: Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate |
|--|--|---|---|
| 6.12 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service | NA | NA | NA |

7. HIA / How will the strategy, policy, plan, procedure and/or service impact on the health and well-being of our population and help address inequalities in health?

Questions in this section relate to the impact on the overall health of individual people and on the impact on our population. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts and any particular groups affected | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate |
|---|---|---|--|
| 7.1 People being able to access the service offered: Consider access for those living in areas of deprivation | There will be enhanced management associated with | NA | NA |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts and any particular groups affected | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate |
|---|---|--|---|
| <p>and/or those experiencing health inequalities</p> <p>Well-being Goal - A more equal Wales</p> | <p>Water Safety and associated control measures</p> | | |
| <p>7.2 People being able to improve /maintain healthy lifestyles: Consider the impact on healthy lifestyles, including healthy eating, being active, no smoking /smoking cessation, reducing the harm caused by alcohol and /or non-prescribed drugs plus access to services that support disease prevention (eg immunisation and vaccination, falls prevention). Also consider impact on access to supportive services including smoking cessation services, weight</p> | <p>There will be enhanced management associated with Water Safety and associated control measures</p> | <p>NA</p> | <p>NA</p> |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts and any particular groups affected | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate |
|--|--|---|--|
| management services etc Well-being Goal – A healthier Wales | | | |
| <p>7.3 People in terms of their income and employment status: Consider the impact on the availability and accessibility of work, paid/ unpaid employment, wage levels, job security, working conditions</p> <p>Well-being Goal – A prosperous Wales</p> | There will be enhanced management associated with Water Safety and associated control measures | NA | NA |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts and any particular groups affected | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate |
|---|---|---|--|
| <p>7.4 People in terms of their use of the physical environment: Consider the impact on the availability and accessibility of transport, healthy food, leisure activities, green spaces; of the design of the built environment on the physical and mental health of patients, staff and visitors; on air quality, exposure to pollutants; safety of neighbourhoods, exposure to crime; road safety and preventing injuries/accidents; quality and safety of play areas and open spaces</p> <p>Well-being Goal – A resilient Wales</p> | <p>There will be enhanced management associated with Water Safety and associated control measures</p> | <p>NA</p> | <p>NA</p> |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts and any particular groups affected | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate |
|--|---|---|--|
| <p>7.5 People in terms of social and community influences on their health: Consider the impact on family organisation and roles; social support and social networks; neighbourliness and sense of belonging; social isolation; peer pressure; community identity; cultural and spiritual ethos</p> <p>Well-being Goal – A Wales of cohesive communities</p> | <p>There will be enhanced management associated with Water Safety and associated control measures</p> | <p>NA</p> | <p>NA</p> |
| <p>7.6 People in terms of macro-economic, environmental and sustainability factors:</p> | <p>There will be enhanced management associated with Water Safety and associated</p> | <p>NA</p> | <p>NA</p> |

| How will the strategy, policy, plan, procedure and/or service impact on:- | Potential positive and/or negative impacts and any particular groups affected | Recommendations for improvement/ mitigation | Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate |
|---|--|--|---|
| Consider the impact of government policies; gross domestic product; economic development; biological diversity; climate Well-being Goal – A globally responsible Wales | control measures | | |

Please answer question 8.1 following the completion of the EHIA and complete the action plan

| | |
|--|---|
| <p>8.1 Please summarise the potential positive and/or negative impacts of the strategy, policy, plan or service</p> | <p>The Water Safety Policy and supporting procedures will provide enhanced water safety management and improved control. This will improve the Health and Safety of all patients, visitors, staff and stakeholders who use/visit the UHB's premises and use water systems of the Board.</p> |
|--|---|

Action Plan for Mitigation / Improvement and Implementation

| | Action | Lead | Timescale | Action taken by Clinical Board / Corporate Directorate |
|---|---|-----------|-----------|--|
| <p>8.2 What are the key actions identified as a result of completing the EHIA?</p> | <p>As the impact will be positive there are no actions as a result of EHIA to be undertaken</p> | <p>NA</p> | <p>NA</p> | <p>NA</p> |

| | Action | Lead | Timescale | Action taken by Clinical Board / Corporate Directorate |
|---|--------|------|-----------|--|
| <p>8.3Is a more comprehensive Equalities Impact Assessment or Health Impact Assessment required?</p> <p>This means thinking about relevance and proportionality to the Equality Act and asking: is the impact significant enough that a more formal and full consultation is required?</p> | NA | NA | NA | NA |

| | Action | Lead | Timescale | Action taken by Clinical Board / Corporate Directorate |
|--|--------|------|-----------|--|
| <p>8.4 What are the next steps?</p> <p>Some suggestions:-</p> <ul style="list-style-type: none"> • Decide whether the strategy, policy, plan, procedure and/or service proposal: <ul style="list-style-type: none"> ○ continues unchanged as there are no significant negative impacts ○ adjusts to account for the negative impacts ○ continues despite potential for adverse impact or missed opportunities to advance equality (set out the justifications for doing so) ○ stops. • Have your strategy, policy, plan, procedure and/or service proposal approved • Publish your report of this impact assessment • Monitor and review | NA | NA | NA | NA |