



Water Safety Policy

Introduction and Purpose

The University recognises that the management of water safety 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 Warwick Innovation Campus Stratford, 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, contractors and others working in the University to comply with this Policy, together with any other instructions, rules and guidance that may apply.

Bacteria and (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, which is the ideal range for bacterial growth.
- Water droplets can be produced and dispersed, increasing the potential for inhalation of harmful bacteria.
- Systems where water is stored and/or re-circulated, leading to potential stagnation and contamination where water droplets can be produced and dispersed.
- 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.

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- 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.
- The risk increases based on the susceptibility of individuals exposed to the bacteria, with those who have weakened immune systems or respiratory conditions being at higher risk.

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

2. Core Principles

- The Duty Holder must appoint a Responsible Person (RP) and Deputy Responsible Person(s) (DRP) to oversee water safety management and ensure compliance with this policy.
- The RP/DRPs are responsible for implementing written schemes designed to control the risk of Legionella and other waterborne pathogens within systems identified by the Risk Assessment.
- The RP/DRPs will regularly monitor and review the effectiveness of the written schemes, ensuring any necessary corrective actions are taken promptly.
- The Water Safety Plan defines how the Duty Holder manages potential risks from exposure to waterborne bacteria in accordance with legislation, guidance, and best practice by:
 - Identifying and assessing sources of risk.
 - Preparing a written scheme for controlling the identified risks, including details of control measures and monitoring procedures.
 - Ensuring adequate staffing, training, and financial resources to effectively implement and maintain control measures.
 - Implementing, managing, and monitoring all control measures identified within the written schemes.
 - Keeping up-to-date electronic records, including risk assessments, maintenance logs, and monitoring results.
- 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 measurers 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.

3. Responsibilities

- i. **Vice-Chancellor:** Holds ultimate accountability but delegates responsibility to the Group Finance Director to ensure strategic oversight of water safety compliance.
- ii. **Group Finance Director:** Delegates responsibility to the Director of Business Services and the Estates Director, ensuring that necessary resources and governance structures are in place.
- iii. **Director of Maintenance:** Acts as the Duty Holder, responsible for implementing this policy, ensuring resources are available, and overseeing compliance with water safety management strategies.
- iv. **Capital Programme Director:** Responsible for the design, installation, and commissioning of water systems, ensuring that new installations meet regulatory requirements and best practices.
- v. **Maintenance Engineering Manager and Deputy Responsible Person(s):** Oversee planned preventative and reactive maintenance, testing, and corrective actions related to water systems.
- vi. **Heads of Departments and Building Managers:**
 - Ensure compliance with this policy within their areas of responsibility.
 - Communicate policy requirements to staff and ensure relevant training is completed.
 - Ensure flushing of little-used outlets and departmental water systems (e.g. research-related water systems) as per guidelines.
 - Report any concerns regarding Legionella proliferation or water contamination to the Duty Holder.
- vii. **University Maintenance Engineering Manager:** Provides expert support to the Director of Maintenance (Duty Holder) through professional advice, audits, and compliance checks.
- viii. **University Strategic Water Safety Management Group:** Acts as a forum for stakeholders to collaborate, review policies, and report findings to the University Health and Safety Executive Committee.
- ix. **Director of Health and Safety:**
 - Advises on legal standards and regulatory requirements for water safety.
 - Updates the Health, Safety, and Wellbeing website with relevant arrangements, instructions, training, and guidance.
 - Conducts spot checks and audits to assess compliance and identify areas for improvement.
- x. **Head of Assurance, Risk, and Property:** Conducts second-line audits, escalating any identified concerns to the Estates Director, Director of Business Services, and Director of Health and Safety.

Review

This policy is dated March 2025. The policy will be reviewed every 3 years

Document Control			
Version Number	Date issued	Author	Update information
V1 22 03 17	22/03/17	John Phillips	Initial version of document
V1.1 22 03 17	13/06/18	John Phillips	Review
V1.2 16 06 22	28/07/22	Andy Clews	Review
V.1.3 11 02 25	18/03/25	Phil Bowen	Review, change of policy title, alignment to updated water safety plan.
Owner: Wendy Roberts, Estates Director		Authorised By: Policy Oversight Group on 6 March and UEB on 17 March 2025	
Source Location: OCH 2006\Management System\04 Planning and Leadership (K)\02 Policy\02 Policies by Topic\01 Current Policies		Approval Date: 17 March 2025	
Published Location: https://www2.warwick.ac.uk/services/healthsafetywellbeing		Review date: 17 March 2028	

Water Safety Policy v1.3
