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|  <p>Iechyd Cyhoeddus<br/>Cymru<br/>Public Health<br/>Wales</p> | <p><b>Name of Meeting</b><br/>Quality, Safety and Improvement Committee</p> <p><b>Date of Meeting</b><br/>14 December 2022</p> <p><b>Agenda item:</b><br/>5.2.2</p> |
|---|---|

|   |  |                                       |                                   |                                       |
|---|--|---------------------------------------|-----------------------------------|---------------------------------------|
| <b>Water Management Policy</b>  |  |                                       |                                   |                                       |
| <b>Executive lead:</b>  | Huw George, Deputy Chief Executive, Executive Director of Operations and Finance |                                       |                                   |                                       |
| <b>Author:</b>  | Chris Orr, Head of Estates and Health and Safety                                 |                                       |                                   |                                       |
| <b>Approval/Scrutiny route:</b>   | Health and Safety Group<br>Business Executive Team- 5 December 2022              |                                       |                                   |                                       |
| <b>Purpose</b>  |  |                                       |                                   |                                       |
| The purpose of this report is to present to the Water Management Policy for <b>approval</b> . |  |                                       |                                   |                                       |
| <b>Recommendation:</b>  |  |                                       |                                   |                                       |
| APPROVE<br><input checked="" type="checkbox"/>  | CONSIDER<br><input type="checkbox"/>   | RECOMMEND<br><input type="checkbox"/> | ADOPT<br><input type="checkbox"/> | ASSURANCE<br><input type="checkbox"/> |
| The Quality, Safety and Improvement Committee is asked to:                                    |  |                                       |                                   |                                       |
| <ul style="list-style-type: none"> <li><b>Approve</b> the Water Management Policy</li> </ul>  |  |                                       |                                   |                                       |

**Link to Public Health Wales [Strategic Plan](#)**

Public Health Wales has an agreed strategic plan, which has identified seven strategic priorities and well-being objectives.

This report contributes to the following:

|  |  |
|--|--|
| <b>Strategic Priority/Well-being Objective</b> | All Strategic Priorities/Well-being Objectives |
| <b>Strategic Priority/Well-being Objective</b> | Choose an item.                                |
| <b>Strategic Priority/Well-being Objective</b> | Choose an item.                                |

**Summary impact analysis**

|  |  |
|--|--|
| <b>Equality and Health Impact Assessment</b> | A EHIA has been completed.   |
| <b>Risk and Assurance</b>                    | The Health and Safety Group monitor all water management risks across the organisation.  |
| <b>Health and Care Standards</b>             | This report supports and/or takes into account the <a href="#">Health and Care Standards for NHS Wales</a> Quality Themes<br>Theme 2 - Safe Care<br>Theme 1 - Staying Healthy<br>Choose an item. |
| <b>Financial implications</b>                | Any financial implications will be considered through the Health and Safety Group and the Estates and Health and Safety Division.  |
| <b>People implications</b>                   | No people implications identified.   |

## 1. Purpose / situation

The purpose of this report is to present to the Water Management Policy for **approval**.

## 2. Background

The current version of the Water Management Policy and Procedure was approved in December 2017 and a review date of April 2022 was assigned to both the Policy Procedure. Review of the policy was delayed due to prioritisation of the response to Covid-19.

Consultation has taken place to ensure that the policy and procedure meets the needs of our stakeholders and the Trust. The Water Management Policy and Procedure went out for consultation on 17 October 2022 and no comments have been received. The Equality Health Impact Assessment has also been updated. The Water Management Policy and Procedure has had input from members of the Health and Safety Group and this was approved at the Health and Safety Group meeting October 2022.

There were no amendments to the Water Management Policy following review. A number of amendments were made to the Water Management Procedure including-

- Removal of wording 'department of health' and update to definition of 'dead leg'.
- Procedure aims and objectives to reflect this policy extends to all PHW properties leased and managed.
- Updated objectives and reference to what the organisation will undertake to achieve aims and objectives.
- Tables under responsibilities section have been removed and included in Appendices.
- Risk assessment section updated as Building and Environment Group no longer exists and reporting arrangements for Health and Safety Group changed to Quality, Safety and Improvement Committee.
- Written Scheme of control added
- Updated training section to reflect requirements of responsible persons
- Record keeping section included

- Legislation section updated to reflect changes in latest applicable regulations and legislation
- Appendices updated to reflect changes to group names across organisation
- Role of Approved Authorised Engineer, Competent Persons, Staff and users included

The implementation of the Water Management Policy and Procedure will be monitored through Health and Safety Group.

The primary source for dissemination of the Water Management Policy and Procedure within the organisation will be via the intranet. It will also be made available to the wider community and our partners via the internet site.

### **3. Description/Assessment**

The updated Water Management Policy and Procedure replaces the existing policy following review and consultation.

The implementation of the Water Management Policy and Procedure will be monitored through Health and Safety Group. The Health and Safety Group have a live work plan that is monitored quarterly and takes forward any actions that relate to water management. Water management actions are also implemented through the Estates and Health and Safety Division. The policy and procedure will be reviewed in three years.

#### **3.1. Consultation**

The documents were added to the Policy Consultation pages on the intranet on 17 October 2022. These document were shared with the members of the Health and Safety Group and comments were invited via individual e-mails from across the organsiation.

#### **3.2. Committee/Groups that have received or considered this document**

Health and Safety approved the policy and procedure subject to a few amendments that have been incorporated.

The Business Executive team **approved** the procedure on the 5 December 2022.

#### **3.3. Implementation plan**

As this is a revised policy, implementation will continue as part of the Health and Safety Group and Estates and Health and Safety Division work plan.

### **3.4. Dissemination**

The primary source for dissemination of these documents within the organisation will be via the intranet. It will also be made available to the wider community and our partners via the internet site.

## **4. Recommendation**

The Committee is asked to:

- **APPROVE** the Water Management Policy.



**GIG**  
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**NHS**  
WALES

Iechyd Cyhoeddus  
Cymru  
Public Health  
Wales

**Reference Number:**

**Version Number: 2**

**Date of next review:** 30 September  
2025

# WATER MANAGEMENT POLICY

## Policy Statement

Public Health Wales considers Water Management to be important and seeks to ensure all staff, stakeholders that it has appropriate policies and procedures in place to safely manage water systems for which it is responsible for.

This policy has been developed in line with the requirements of the Health and Safety at Work etc., Act 1974 and the Welsh Health Technical Memorandum (WHTM) 04 – 01 (Safe water in healthcare premises) and Approved Code of Practice (ACoP) L8 (The control of legionella bacteria in water systems).

## Policy Commitment

Public Health Wales is committed to ensuring the health, safety and welfare of its staff and those who are affected by its activities, and recognises the obligations imposed under:

The Health and Safety at Work etc., Act 1974, and the Welsh Health Technical Memorandum (WHTM) 04 – 01 (Safe water in healthcare premises) and ACoP L8 (The control of legionella bacteria in water systems):

- Where Public Health Wales is responsible for water management minimise water related incidents
- Implement appropriate controls to minimise incidence.

It is essential that the risk of Legionella in all areas of Public Health Wales buildings/sites, where it has responsibility for water systems, is considered and suitably assessed in order that effective controls can be developed and implemented.

Risk assessments will pay particular attention to both environmental (engineering system) and risks associated with the occupants which includes:

- degree of immunocompromise of individuals (staff and service users) using the area (where applicable)
- categorisation of the area as clinical or non-clinical or solely used by staff
- water circulation/stagnation/dead legs/usage/turnover
- water temperature

- aerosol generation
- little used outlets
- number of positive legionella sample detections
- type of outlets water treatment

### **Supporting Procedures and Written Control Documents**

All other organisational Health and Safety policies, procedures and written control documents:

- Health and Safety Policy
- Water Management Procedure
- Infection Control Policy
- Control of Contractors Procedure
- Control of Substances Hazardous to Health Procedure

### **Scope**

This policy and any arrangements made under it applies to:

- all the buildings currently owned or occupied (under a full maintenance lease or otherwise) by the Trust
- All persons employed or engaged by Public Health Wales, including part time workers, temporary and agency workers, those holding honorary contracts and those engaged by the NHS Wales Health Collaborative and Finance Delivery Unit
- All contractors, service users, visitors and volunteers

Where Public Health Wales provides services with other organisations, including health boards, the policies and procedures of the employing organisation including honorary contract holders will apply. Where appropriate joint working arrangements will be agreed and for shared premises a Service Level Agreement/Memorandum of Understanding or alternative agreement will be in place.

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| <b>Equality and Health Impact Assessment</b>                              | Assessment complete and provided   |
| <b>Approved by</b>  |  |
| <b>Approval Date</b>  |  |
| <b>Review Date</b>  | 30 November 2025   |
| <b>Date of Publication:</b>   |  |
| <b>Group with authority to approve supporting policies and procedures</b> | Policies - Quality, Safety and Improvement Committee<br>Procedures – Health and Safety Group |

|  |   |
|--|---|
| <b>Accountable Executive Director/Director</b> | Huw George, Deputy Chief Executive/ Executive Director for Operations and Finance |
| <b>Authors</b>                                 | Chris Orr, Head of Estates (Facilities) & Health and Safety                       |

**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 [Corporate Governance](#).**

| <b>Summary of reviews/amendments</b> |                       |                         |                       |                              |
|--------------------------------------|-----------------------|-------------------------|-----------------------|------------------------------|
| <b>Version number</b>                | <b>Date of Review</b> | <b>Date of Approval</b> | <b>Date published</b> | <b>Summary of Amendments</b> |
| 1                                    | 30-Sept-17            | 19-Dec-17               | 5-Feb-18              | Version 1 of policy          |
| 2                                    | 29-September-22       |                         |                       | No changes to policy         |

**Public Health Wales NHS Trust**  
**Equality & Health Impact Assessment for**  
***Water Management Policy – Version 1***

**Part 1**

Please answer all questions:-

|           |   |   |
|-----------|---|---|
| <b>1.</b> | For service change, provide the title of the Project Outline Document or Business Case and Reference Number | Water Management Policy – Version 3   |
| <b>2.</b> | Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details | Operations and Finance<br>Christopher Orr, Head of Estates and Health and Safety<br>Email: <a href="mailto:christopher.orr@wales.nhs.uk">christopher.orr@wales.nhs.uk</a><br>Tel: 02920 104264/ 07890 161267  |
| <b>3.</b> | Objectives of strategy/ policy/ plan/ procedure/ service  | <p>To ensure that Public Health Wales acts in accordance with the Health and Safety at Work Act 1974, the Welsh Health Technical Memorandum (WHTM) 04 – 01 (Safe water in healthcare premises) and Approved Code of Practice (ACoP) L8 (The control of legionella bacteria in water systems) by:</p> <ul style="list-style-type: none"> <li>• Implementing appropriate arrangements and management protocols, in order to prevent opportunities for Legionella bacteria and other waterborne contaminants to proliferate within the water system;</li> <li>• securing the health, safety and welfare of people at work;</li> <li>• protecting service users and people other than those at work against risks to their health and safety arising out of work activities;</li> </ul> |

|                  |  |  |
|------------------|--|--|
|                  |  | <ul style="list-style-type: none"> <li>• establishing a culture of co-operation, communication, competency and control for health and safety.</li> </ul>   |
| <p><b>4.</b></p> | <p>Evidence and background information considered. For example</p> <ul style="list-style-type: none"> <li>• population data</li> <li>• staff and service users data, as applicable</li> <li>• needs assessment</li> <li>• engagement and involvement findings</li> <li>• research</li> <li>• good practice guidelines</li> <li>• participant knowledge</li> <li>• list of stakeholders and how stakeholders have engaged in the development stages</li> <li>• comments from those involved in the designing and development stages</li> </ul> <p>Population pyramids are available from Public Health Wales Observatory and the 'Shaping Our Future Wellbeing' Strategy provides an overview of health need.</p> | <ul style="list-style-type: none"> <li>• Developed in line with statutory requirements.</li> <li>• Good practice guidance sought from other NHS bodies / NHS standards.</li> <li>• Discussions with colleagues throughout the Health and Safety networks</li> <li>• Health and Safety Executive website (Water management – Legionella).</li> <li>• Health and Safety Group</li> </ul> |
| <p><b>5.</b></p> | <p>Who will be affected by the strategy/ policy/ plan/ procedure/ service</p> <p>Consider staff as well as the population that the project/change may affect to different degrees.</p>   | <p>All staff throughout the organisation, visitors and service users and contractors.</p>  |

## Part 2- Equality and Welsh language

### 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'.

| <b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>  | <b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b> | <b>Action taken by Directorate.</b><br>Make reference to where the mitigation is included in the document, as appropriate<br><b>This column is to be updated in future reviews</b> | <b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b> |
|---|---|--|--|
| <b>6.1 Age</b><br>For most purposes, the main categories are: <ul style="list-style-type: none"> <li>• under 18;</li> <li>• between 18 and 65; and</li> <li>• over 65</li> </ul>                  | No impact   |  |  |
| <b>6.2 Persons with a disability as defined in the Equality Act 2010</b><br>Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term | No impact   |  |  |

|   |           |  |  |
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| medical conditions such as diabetes   |           |  |  |
| <p><b>6.3 People of different genders:</b><br/>Consider men, women, people undergoing gender reassignment</p> <p><b>NB</b> 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> | No impact |  |  |
| <b>6.4 People who are married or who have a civil partner.</b>  | No impact |  |  |
| <b>6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.</b>  | No impact |  |  |

|  |           |  |  |
|--|-----------|--|--|
| <p><b>6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers</b></p>  | No impact |  |  |
| <p><b>6.7 People with a religion or belief or with no religion or belief.</b><br/>The term 'religion' includes a religious or philosophical belief</p>   | No impact |  |  |
| <p><b>6.8 People who are attracted to other people of:</b></p> <ul style="list-style-type: none"> <li>• the opposite sex (heterosexual);</li> <li>• the same sex (lesbian or gay);</li> <li>• both sexes (bisexual)</li> </ul> | No impact |  |  |
| <p><b>6.9 People according to their income related group:</b><br/>Consider people on low income, economically inactive, unemployed/workless,</p>   | No impact |  |  |

|   |           |  |  |
|---|-----------|--|--|
| people who are unable to work due to ill-health   |           |  |  |
| <b>6.10 People according to where they live:</b><br>Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities  | No impact |  |  |
| <b>6.11 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service</b>  | No impact |  |  |
| <b>6.12 Welsh Language</b>  |           |  |  |
| <b>There are 2 key considerations to be made during the development of a policy, project, programme, service to ensure there are no adverse effects and/or a positive or increased positive effect on:</b><br>(please note these will continue to be reviewed to ensure Public Health Wales fulfils their duties to comply with one or more standards outlined within the Welsh Language Standards (No 7) Regulations 2018) |           |  |  |
| <b>Opportunities for persons to use the Welsh language</b>  | No impact |  |  |
| <b>Treating the Welsh language no less favourably than the English language</b>   | No impact |  |  |

### Part 3 – Health

Questions in this section relate to the impact on the health and wellbeing outcomes of the population **and** specific population groups who could be more impacted than others by a policy/project/proposal.

The part of the assessment identifies;

- which specific groups in the population could be impacted more (inequalities)
- what those potential impacts could be across the wider determinants of health framework?
- Potential gaps, opportunities to maximise positive H&WB outcomes
- Recommendations/mitigation to be considered by the decision makers

#### 7. Identification of specific population groups

Use the WHIASU Population Groups checklist as a reference to identify the population groups who could be more impacted than others by a policy/project/proposal. The check list can be found on the PHW Integrated EqHIA guidance pages (requires link to PHW Intranet pages for additional information and resources)

The groups listed have been identified as more susceptible to poorer health and wellbeing outcomes (health inequalities) and therefore it is important to consider them in a HIA assessment. In a HIA, the groups identified, as more sensitive to potential impacts will depend on the characteristics of the local population, the context, and the nature of the proposal itself.

| 7.1 Groups identified | Rational/explanation |
|-----------------------|----------------------|
| No groups identified  |                      |

#### Assessment

Complete the wider determinants framework table below providing rational/evidence where appropriate:

1. Consider how the proposal could impact on the population and specific population groups identified above (positive/negative) for each of the wider determinants (the bullets under each determinant are there as a guide)
2. Record any unintended consequences (negative impacts) and/or gaps identified
3. Record any positive impacts or missed opportunities to maximise positive health and wellbeing outcomes
4. identify and record mitigation/recommendations where appropriate

**Please note** you may find that not all determinants are relevant to the project/plan however recording N/A is not acceptable a rational or evidence should be explained/referenced

| Wider determinant for consideration   | Positive impacts or additional opportunities | Unintended consequences or gaps | Population groups affected | Mitigation/recommendations |
|---|--|---------------------------------|----------------------------|----------------------------|
| <b>7.2 Lifestyles</b> <ul style="list-style-type: none"> <li>• Diet/nutrition/breastfeeding</li> <li>• Physical activity</li> <li>• Use of alcohol, cigarettes, e-cigarettes</li> <li>• Use of substances, non-prescribed drugs, abuse of prescription medication</li> <li>• Social media use</li> <li>• Sexual activity</li> <li>• Risk-taking activity i.e. gambling, addictive behaviour</li> </ul>  | No impact                                    |                                 |                            |                            |
| <b>7.3 Social and community influences on health</b> <ul style="list-style-type: none"> <li>• Adverse childhood experiences</li> <li>• Citizen power and influence</li> <li>• Community cohesion, identity, local pride</li> <li>• Community resilience</li> <li>• Domestic violence</li> <li>• Family relationships</li> <li>• Language, cultural and spirituality</li> <li>• Neighbourliness</li> <li>• Social exclusion i.e. homelessness</li> <li>• Parenting and infant attachment</li> <li>• Peer pressure</li> </ul> | No impact                                    |                                 |                            |                            |

|   |  |      |   |                             |
|---|--|------|---|-----------------------------|
| <ul style="list-style-type: none"> <li>• Racism</li> <li>• Sense of belonging</li> <li>• Social isolation/loneliness</li> <li>• Social capital/support/networks</li> <li>• Third sector &amp; volunteering</li> </ul>   |  |      |   |                             |
| <b>7.4 Mental Wellbeing</b> <ul style="list-style-type: none"> <li>• Does this proposal support sense of control?</li> <li>• Does it enable participation in community and economic life?</li> <li>• Does it impact on emotional wellbeing and resilience?</li> </ul>   | No impact  |      |   |                             |
| <b>7.5 Living/ environmental conditions affecting health</b> <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Attractiveness/access/availability/quality of area, green and blue space, natural space.</li> <li>• Health &amp; safety, community, individual, public/private space</li> <li>• Housing, quality/tenure/indoor environment</li> <li>• Light/noise/odours, pollution</li> <li>• Quality &amp; safety of play areas (formal/informal)</li> <li>• Road safety</li> <li>• Urban/rural built &amp; natural environment</li> <li>• Waste and recycling</li> <li>• Water quality</li> </ul> | Ensures that Public Health Wales is compliant with the law and regulations to ensure it provides a safe workplaces for staff and service users | None | Any person attending a Public Health Wales managed building | No further action required. |
| <b>7.6 Economic conditions affecting health</b> <ul style="list-style-type: none"> <li>• Unemployment</li> <li>• Income, poverty (incl. food and fuel)</li> <li>• Economic inactivity</li> <li>• Personal and household debt</li> <li>• Type of employment i.e. permanent/temp, full/part time</li> </ul>   | No impact  |      |   |                             |

|   |           |  |  |  |
|---|-----------|--|--|--|
| <ul style="list-style-type: none"> <li>• Workplace conditions i.e. environment culture, H&amp;S</li> </ul>  |           |  |  |  |
| <p><b>7.7 Access and quality of services</b></p> <ul style="list-style-type: none"> <li>• Careers advice</li> <li>• Education and training</li> <li>• Information technology, internet access, digital services</li> <li>• Leisure services</li> <li>• Medical and health services</li> <li>• Other caring services i.e. social care; Third Sector, youth services, child care</li> <li>• Public amenities i.e. village halls, libraries, community hub</li> <li>• Shops and commercial services</li> <li>• Transport including parking, public transport, active travel</li> </ul> | No impact |  |  |  |
| <p><b>7.8 Macro-economic, environmental and sustainability factors</b></p> <ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Climate change/carbon reduction/flooding/heatwave</li> <li>• Cost of living i.e. food, rent, transport and house prices</li> <li>• Economic development including trade</li> <li>• Government policies i.e. Sustainable Development principle (integration; collaboration; involvement; long term thinking; and prevention)</li> <li>• Gross Domestic Product</li> <li>• Regeneration</li> </ul>  | No impact |  |  |  |

**Stage 3**

**Summary of key findings and actions Please answer question 8.1 following the completion of the EHIA and complete the action plan**

|   |   |      |  |  |
|---|---|------|--|--|
| Key findings:<br>Impacts/gaps/opportunities | Actions (what is needed and who needs to do) to address the identified mitigation and recommendations | Lead |  |  |
| No impacts identified                       | No actions identified   |      |  |  |

**Alternatively, if appropriate, please explain the steps taken to consult with and consider the differential impact of the changes on the various protected characteristic groups (part 2) or any specific identified population groups (part 3).**