



Water Hygiene Policy (Surrey and Sussex) (1096/2025)

Abstract

This policy, through the Water Hygiene Management Plan, outlines Surrey Police's and Sussex Police's (hereto referred to as The Forces) commitment to manage their water systems in a manner that reduces the risk of bacterial colony growth and promotes a high standard of compliance.

Policy

1. Introduction

1.1 Legionnaires' Disease is a potentially fatal form of pneumonia which can affect anybody, but which principally affects those who are susceptible because of age, illness, immunosuppression, smoking etc. It is normally contracted by inhaling legionella bacteria contained in aerosol droplets.

1.2 Anyone can contract Legionnaires' Disease; however certain sectors of the community have been identified as at higher risk of contracting the potentially fatal infection. Risk factors include:

- Individuals, over the age of 45.
- Individuals who are heavy drinkers and smokers.
- Individuals with chronic respiratory or kidney disease.
- Individuals with Diabetes, lung, and heart disease.
- Those with an impaired immune system.

1.3 Conditions which increase the risk of legionella being present and causing a risk to health include, water being stored in any part of the system at temperatures between 20°C and 45°C; stagnation or low flow; the presence of nutrients for the bacteria to grow on, such as rust, sludge, scale, and organic matter; and where there is the potential for aerosols to be produced by the water system.

1.4 If Legionella bacteria is detected in water samples at concentrations equal to or exceeding 100 cfu/l, Estates and Facilities shall promptly submit an immediate report to the Health and Safety Service. This report will comprehensively outline an action plan designed to effectively control the system and ensure the highest level of safety.

- If legionella bacteria is detected in showers at levels equal to or exceeding 100 colony forming units/litre (cfu/l), the shower is to be isolated to employees and an action plan will be create until a sample of below 100 cfu/l is achieved.

- If legionella bacteria is detected in any outlets equal to or exceeding 100 cfu/l, the responsible person will risk assess if the outlet is to be isolated or to remain in use and will create an action plan until a sample of below 100 cgu/l is achieved.

1.5 The Custody Department presents a specific vulnerability due to the complex health needs of individuals passing through, heightening their susceptibility to legionella infection. If required, an additional control measure could be introduced to reduce the risk of legionella.

1.6 Estates and Facilities adopts a proactive approach to assess and identify little-used outlets, and any changes to the building usage may result in little-used outlets being removed or added to the weekly flushing register.

2. Scope

2.1 This policy applies to Police Officers, Special Constables, Police Staff, Police Support Volunteers, contractors and visitors.

2.2 The Water Hygiene Management Plan defines the way the water systems are to be managed within The Forces.

3. Policy Statement

3.1 The Forces need to maintain a safe and healthy environment for all persons who make use of the facilities. We will continue to make use of appropriate modern technology to reduce the risk of bacterial colonies developing in the water systems, drive down management costs and work towards achieving excellence in water management.

Procedure

1. Statement of Intent

1.1 Estates and Facilities is committed to managing the risk of Legionnaires' Disease across all properties within the scope of its responsibilities. To accomplish this goal, Estates and Facilities intends to adhere to the principles of control and management outlined in the Health and Safety Executive (HSE) Approved Code of Practice and Guidance Document L8 (ACOP L8) 'The Control of Legionella Bacteria in Water Systems' and 'HSG274 Legionnaire's Disease: Technical guidance'. Estates and Facilities will undertake risk management activities in a way that is reasonably practical and designed to prevent harm or illness to staff, contractors, and anyone else who may be affected by activities on the Force's premises.

2. Arrangements

2.1 Estates and Facilities has implemented arrangements to prevent the growth of legionella bacteria in water systems in accordance with the HSE's 'Approved Code of Practice (ACOP) (L8)'

These arrangements include:

- Assessment of Legionnaires' Disease risk and preparation of a scheme for preventing or controlling the risk, conducted by a competent contractor.
- The Responsible Person (RP) has been appointed in the joint Forces, who has sufficient authority, competence, and knowledge of the installation to ensure that all operational procedures are carried out effectively, as defined within the HSE's ACOP, and any precautions specified in the risk assessment.
- The maintenance of records of all applicable maintenance and testing is held in Force Estates and Facilities folders, together with a copy of the risk assessment and details of the competent person who conducted it. That information is readily available upon request.
- The RP must ensure that all necessary precautions have been implemented as far as reasonably practicable.

2.2 In the event of difficulties in implementing the risk control programme, or test results falling outside of the required limits. The RP reports this immediately to the Health and Safety Service, outlining an action plan to ensure the system is brought back under control. Additional resources, water treatment contractors or plumbing specialists will be engaged as necessary to resolve the causes.

3. Water Hygiene Management Plan

3.1 The Water Hygiene Management Plan outlines the approach of the Forces in managing water systems within the organisation. It specifies the roles and responsibilities of different stakeholders, including senior management and operational staff, to ensure the effective implementation of the plan and compliance with relevant regulations. Through the development and implementation of a Water Hygiene Management Plan, the organisation can effectively fulfil its duty of care. To obtain a complete copy of the Water Hygiene Management Plan, please contact Quality and Compliance Team.

4. Responsibilities

4.1 The Police and Crime Commissioner (PCC) has ultimate responsibility for ensuring the safety of the police estate and those who could be affected by it within their respective Force. The Surrey PCC is responsible for the Surrey Police Estates, while the Sussex PCC is responsible for the Sussex Police Estate.

4.2 Regarding the Force's premises, both PCCs delegate the day-to-day responsibility for ensuring compliance with the duties imposed by the Health and Safety at Work etc. Act 1974, The Management of Health and Safety at Work Regulations 1999, The Water Supply (Water Fittings) Regulations 1999 and the Control of Substances Hazardous to Health Regulations 2002 (COSHH), supported by HSE ACOP L8, to the Service Director of Estates and Facilities.

4.3 The Head of Estates has appointed a Responsible Person who is competent to take day-to-day responsibility for controlling any identified risk from legionella bacteria. The Responsible Person is ally, The Estates and Facilities Maintenance and Project Service Delivery Manager.

Team: Estates