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# University of Cambridge Water Safety Procedure

## Water Safety Procedure v1.0

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### Approval History

Version	Produced By	Amendment	Approved by	Date
1.0	Ian Farnell and Peter Dempsey	Word "risk" added to para 1.5	Consultative Committee for Safety	18 <sup>th</sup> November 2025

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## 1. Introduction

- 1.1 This document is a Procedure as defined by the University's Governance and Compliance Division It also falls under the umbrella of the University of Cambridge Health & Safety Policy HSD016M. As such compliance with this Procedure is mandatory.
- 1.2 The University of Cambridge ("The University") recognises the importance of providing a working environment that is safe and healthy for all students, patients, employees, contractors, and visiting members of the public.
- 1.3 The University recognises its statutory obligations and common law duty of care and undertakes to comply with all the relevant legal requirements.
- 1.4 The University believes that effective management of water safety improves the ability of the University to provide safe water systems across the Estates portfolio.  
To this end, management at all levels has been given the responsibility for ensuring that resources, facilities, information, instruction, training, and supervision are provided to ensure a safe and healthy working environment.
- 1.5 The University's approach to risk of injury, ill health and operational interruption will be based on the systematic identification, evaluation, and control of hazard.  
Where risk is identified, the University will seek to avoid/remove it. Where this is not possible the University will control and manage appropriately.
- 1.6 The University will take account of its health and safety obligations in relation to Water Safety when setting budgets and will allocate available resources in order that directors and managers may implement appropriate risk reduction measures and ensure compliance with health and safety requirements.
- 1.7 The University recognises the importance of all employees contributing positively to health and safety through consultation and communication at site-based meetings, and in consultation with tenant and sub-tenant relationships. Equally it is the duty of every employee to take reasonable care to safeguard their own health and safety and that of others who may be affected by their actions at work, and to cooperate with management

and fellow employees to enable statutory duties or requirements to be fulfilled.

- 1.8 The University will ensure that effective training/information is provided for all levels of staff on matters relating to water safety.
- 1.9 The University will ensure that the water safety performance is measured and reviewed by implementing an effective monitoring system.  
The Water Safety Team will be responsible for undertaking an annual audit of water safety management systems, regular workplace inspections, and analysis of incident statistics.
- 1.10 The University recognises the importance of good communications and establishing cooperation and involvement in Water Safety.
- 1.11 The University will ensure that adequate resource is available to implement this Procedure.
- 1.12 For non-Healthcare-related premises, the primary guidance will be **ACOP L8**, supported by **HSG 274** (2024) Parts 1, 2 and 3.  
For Healthcare-related properties the primary guidance will be **HTM04-01** (2016) Safe Water in Healthcare Premises – all parts.
- 1.13 Healthcare-related premises may be further supported by **HSE/CQC** as appropriate, and where adverse waterborne pathogens are identified.
- 1.14 So far as is reasonably practicable, new properties will be designed in a manner that reduces water safety risk.
- 1.15 In existing properties where major works involving refurbishments, or modifications to plant and/or systems is being considered the design of these must seek to reduce water safety risk.
- 1.16 This Procedure will be reviewed every three years, or sooner if there are reasons to believe that it is no longer valid.



## 2. Purpose

- 2.1 This document aims to establish standards and systems to control the risks associated with waterborne pathogens and scalding.  
*For example; the introduction of measures to control levels of bacteria present in water systems and reduce so far as reasonably practicable exposure to water aerosols.*
- 2.2 In addition, this document sets out the University's arrangements that assist with meeting statutory water duties. It also aims to ensure that its Healthcare facilities comply with nationally recognised HTM standards.
- 2.3 This Procedure establishes the direction for its associated Water Safety Code of Practice (COP), Written Scheme of Control, and supportive Standard Operating Procedures providing guidance on the management, operation, maintenance, and environmental monitoring of the University's water systems.
- 2.4 This Procedure and its associated Water Safety COP should be read in conjunction with specific guidance pertaining to specialist processes and water systems.
- 2.5 Please see the References (*page 14*) for further information on supportive guidance and documentation.

## 3. Scope

- 3.1 This Procedure relates to all University of Cambridge properties where the University operates any water systems, including, but not limited to:  
*Hot & Cold Domestic Water Services, Water Features, Hydrotherapy Pools, Horticultural Irrigation, Fire Sprinkler Systems, Vehicle Washers, Catering Installations, and Specialist Research Equipment.*
- 3.2 Where the University is landlord or tenant, roles and responsibilities for safe operation of water systems must be clarified, and if they reside with the University, this Procedure will apply.
- 3.3 This Procedure does not apply to natural water masses such as;  
*lakes and ponds, rivers, streams, reservoirs and surface rainwater.*

- 3.4 This Procedure applies to all employees, students, and visitors, including members of the public. All contracted and third-party staff directly employed/engaged by the University of Cambridge, together with appointed contractors, must adhere to this Procedure.
- 3.5 This Procedure is to be always made available to all personnel. It must not be amended or changed without express permission in writing.

## 4. Roles and Responsibilities

### 4.1 The Chancellor, Masters and Scholars

- 4.1.1 The Chancellor, Masters and Scholars of the University of Cambridge are accountable for the University Water Safety Procedure and will ensure that adequate funding and appropriate mechanisms are in place for implementing this Procedure.

### 4.2 Key Roles

- 4.2.1 As an absolute minimum the University will recognise the following roles and respective levels of responsibility as crucial to the effective management of a Water Safety Regime.

#### 4.2.2 Duty Holder

The Duty Holder will secure adequate resources to allow reporting staff to fulfil their duties and responsibilities under this Procedure and associated documents.

The Director of Estates

Is the Duty Holder with responsibility for implementing this Procedure for all operational and non-operational properties which are maintained by the Estates Division.

The Director of Cancer Research UK Cambridge Institute

Is the Duty Holder with responsibility for implementing this Procedure in all CRUK Cambridge Institute buildings.

The Director of the Sainsbury Laboratory

Is the Duty Holder with responsibility for implementing this Procedure at all Sainsburys Laboratory buildings.

The Vice Principal of Homerton College

Is the Duty Holder with responsibility for implementing this Procedure at Mary Allen Building and Science Block.

Where a property or water system is identified, built or acquired, that is not already clearly assigned to one of the above Duty Holders, the Water Safety Team will be responsible for identify the most appropriate person to act as the Duty Holder and write to the post holder notifying them of their responsibilities under this Procedure. The new Duty Holder is required to comply with this Procedure in full, however, if the new Duty Holder believes that the assignment is incorrect, they should contact the Water Safety Team but if agreement cannot be reached, they may appeal to the Sub Committee for Estate Safety who will make a determination.

The Duty Holder(s)' responsibilities include, but are not limited to:

- *ensuring that a Legionella Risk Assessment is in place for all water services with a foreseeable risk*
- *identifying and appointing in writing a Responsible Person who has sufficient authority and knowledge of the installations to help take measures to comply with this Procedure and the law*
- *ensuring that the Legionella Risk Assessment recommendations are adequately managed, and that necessary control measures are implemented, including safe systems of work*
- *ensuring that a Written Scheme of Control for preventing or controlling the risks is prepared, implemented and managed, and that precautions are monitored*
- *ensuring that Records are kept in accordance with the standards directed by the Water Safety Team*
- *ensuring that any construction, refurbishment or upgrade projects are delivered by persons that are conversant with all requirements, and adhere to this Procedure and associated documents*
- *ensuring that all water systems including associated plant and equipment is maintained in safe condition and meets the standards directed by the Water Safety Team*
- *ensuring that any changes of responsibility for property, ie new builds, properties bought or sold, properties returned from a let under an FRI lease etc are notified immediately to the Responsible Person*



#### 4.2.3 Responsible Person

A Responsible Person (water) is an individual who is appointed and has accepted responsibility under the authority of the Duty Holder for ensuring a business or organisation's responsibilities for water safety are met, and that all persons assigned to carry out Water Safety related tasks are competent to do so.

The Responsible Person's responsibilities include, but are not limited to:

- *ensuring that up to date legionella risk assessments and written schemes are in place for their areas, including implementation of controls to manage and monitor the risks from the water systems*
- *evaluating and appointing Competent Persons to carry out water safety-related tasks and remedial works*
- *ensuring that any significant water safety issues are communicated in accordance with the Water Safety COP*
- *ensuring that all faults and anomalies identified by monitoring, routine inspections, etc are managed effectively*
- *implementing and monitoring the efficacy of the organisational Water Safety COP for their respective areas*
- *ensuring that all records are kept in accordance with the Water Safety COP*
- *ensuring that all control schemes handed over to the Department/College are appropriately documented, commissioned and signed off in accordance with the Water Safety COP*
- *carrying out the necessary actions defined in the Water Safety COP, should an outbreak situation associated with waterborne pathogens be suspected or confirmed*
- *liaising with third parties on assurance*
- *attending updated management training at least every three years, or sooner if determined by the training needs analysis*

The Responsible Person will attend, so far as reasonably practicable, termly Water Safety meetings organised and chaired by the Water Safety Team.



#### 4.2.4 Competent Person

The Competent Person(s) (water) is evaluated and appointed in writing by the Responsible Person, details of which will be entered in the relevant Water Safety Logbook(s).

The Competent Person can be an individual who is directly employed by the University, and/or an external contracted organisation.

All operatives must have received the relevant training required to fulfil their duties and must retain up to date records.

The Management Structure in the Water Safety Logbook will refer to individual Competent Persons by name and job title, whereas contracted organisations will be referred to by their registered trading name.

The Competent Person's responsibilities include, but are not limited to:

- *carry out all delegated tasks detailed in the Written Scheme of Control, ensuring that accurate records are kept*
- *escalate issues, defects, anomalies or concerns regarding the design, condition, operation or performance of water systems that might increase the risk of waterborne pathogen proliferation to the Responsible Person in a timely manner*
- *maintain good hygiene practices with tools, equipment, components/accessories used on water systems, thus preventing contamination of water systems and outlets*
- *ensure good personal hygiene practices (including clothing and footwear) before commencing any work on water systems*
- *ensure that any monitoring equipment is calibrated and has an in-date certificate to evidence this*
- *use only Water Regulations Advisory Scheme [WRAS] approved materials when working on water systems*
- *attend updated training at least every three years, or sooner if determined by the training needs analysis*
- *attend water safety related meetings as requested*



#### 4.2.5 Water Safety Team

The Water Safety Team, led by the Water Safety Manager, sits within Estates Division and is responsible for setting and monitoring corporate standards for Water Safety.

The Water Safety Team's responsibilities include, but are not limited to:

- *drafting and reviewing the University's Water Safety Procedure and Water Safety COP*
- *providing advice on procedures and actions for the prevention or control of waterborne pathogens*
- *overseeing and monitoring Department and Institution compliance with the University's Water Safety Procedure*
- *the provision of support and technical expertise for Legionella and scalding related issues*
- *carry out audits and investigations on Water Safety related matters*

The Water Safety Team can elect to appoint an Authorising Engineer (water) to provide additional support and act as an independent advisor.

### 4.3 Optional Role

#### 4.3.1 Authorised Person

Where appropriate, a localised Water Safety representative can be appointed in writing by the Duty Holder, to implement the Water Safety COP of a single building or occupied space, or multiple instances within a given department.

The Authorised Person's responsibilities include, but are not limited to:

- *to monitor the performance of the Competent Person(s), ensuring that the Written Scheme of Control is implemented, and accurate records are kept*
- *escalate findings and concerns reported by the Competent Person(s) to the Responsible Person in a timely manner*



- *issue Permits to Work and other appropriate documentation as required to Competent Persons and/or approved contractors, and in doing so, ensuring that the competency of individual operatives has been verified*
- *ensure that all works involving alterations to water systems have been authorised by the Responsible Person prior to commencement*
- *where applicable, review Planned Preventative Maintenance (PPM) activities to ensure that they are being completed in line with the defined schedules, and escalate any concerns to the Responsible Person*
- *attend updated training at least every three years, or sooner if determined by the training needs analysis*
- *attend the Water Safety Group and any other operational water safety related meetings as requested*

## 5. Responsibility Assignment Matrix

Stages	Chancellor, Master and Scholars	Duty Holder	Responsible Person	Water Safety Team	Authorised Person	Competent Person
Policy Drafting & Review	A	C	C	R	I	I
Policy Implementation	-	A	R	M	I	I
Identification & Appointment of Responsible Person	-	A R	C	M	I	I
Identification & Appointment of Authorised Person	-	A R	C	M	C	I
Identification & Appointment of Competent Person	-	A	R	M	I	C
Training Provision	-	A	R	M	I	I
Legionella Risk Assessments	-	A	R	M	I	I
Anti-Scalding Risk Assessment	-	A	R	M	C	I
Produce LCOP (Written Scheme of Control)	-	A	R	M C	I	I
Implement LCOP (Written Scheme of Control)	-	A	R	M	M	R I
Implementation of Actions from LRA / Service Reports	-	A	R	M	R C	R I
Record Keeping	-	A	R	M	I	I
Notification of Changes in Water Systems / Building Usage / Management	-	A	R C	M	I	I
Auditing / Investigations	A	I	C	R	I	I
Duty Holder Identification for Unassigned Property	A	C	C	R	I	I

R Responsible  
 A Accountable  
 C Consulted  
 I Informed  
 M Monitor



## 6. Bibliography

6.1 This document is supported by several key documents:

- Associated HBN's (Health Building Notes)
- British Standards – BS7592:2022 – Sampling for Legionella in Water Systems – Code of Practice.
- British Standards – BS8680:2020 Water Quality – Water Safety Plans – Code of Practice
- British Standards – BS8580 – Part 1:2019 – Legionella Risk Assessments – Code of Practice
- British Standards – BS8580 – Part 2:2022 – Pseudomonas Aeruginosa – Code of Practice.
- Control of Substances Hazardous to Health Regulations 2002
- Health & Safety at Work Act 1974 (HSW)
- HSE – ACOP L8 – Fourth Edition – 2013 – The Control of Legionella Bacteria in Water Systems
- HSE – HSG 274 – Parts 1,2 and 3 – The Control of Legionella Bacteria in Water Systems
- HTM 04-01 Parts A, B and C plus supplement D08 – Healthcare Water Guidance
- HTM 01-05 – Decontamination in Primary Care Dental Practices.
- HTM 07-04 – Water Management and Water Efficiency – best practice for the Healthcare sector
- Management of Health & Safety at Work Regulation 1999
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 2013 (RIDDOR)
- Water Supply (Water Fittings) Regulations 1999
- Workplace (Health, Safety and Welfare) regulations 1992

6.2 Please note that this list is not exhaustive: other supportive documentation will apply and should be referenced accordingly. Documentation needs to be read in conjunction with the Water Safety COP and Written Scheme of Control, which sets out a procedural framework for the safe management of water delivery across the University.