



Water Risk Management and Control Policy

1. Purpose

The Water Risk Management and Control Policy (WRM and Control Policy) outlines the WA Country Health Service (WACHS) obligations that relate specifically to the management and control of microorganisms (including Legionella) in water systems within relevant WACHS facilities.

WACHS is to comply with all relevant legislation and standards relating to water risk management and control as outlined in the [Document Summary](#). The [WACHS Water Risk Management Framework](#) (WRM Framework) incorporates this policy, read in conjunction with the [Water Risk Management Procedure](#) (WRM Procedure) and supporting [Water Risk Management Facility Plan Guideline](#) (WRM Facility Plan Guideline).



Figure 1:WACHS Water Risk Management Framework

2. Policy

This policy is applicable to all water distribution systems inclusive of cooling towers that service the following WACHS buildings:

- health care facilities
- aged care facilities
- renal hostels
- any other facility that requires a licence and accreditation regulatory unit (LARU) licence.

All microbial hazards that can be present in the water infrastructure of relevant WACHS facilities must be identified, evaluated, and managed in accordance with current standards and guidelines.

2.1 Water Risk Management Procedure

This policy informs the WACHS WRM Procedure which outlines the following obligations:

- establishment and review function of the Water Risk Management Committee (WRM Committee) in a region
- the requirements for WRM Facility Plans
- the mechanisms for maintaining WRM Facility Plans
- the risk analysis process and management strategies
- guidelines for responding to detections or cases.

Each WACHS Building must ensure there is a current and approved WRM Facility Plan that outlines how relevant legislation and standards obligations are met in relation to appropriate risk management and responses to detections or cases.

The nominated responsible manager for a facility is to liaise with relevant staff to ensure microbial management activity is occurring in accordance with the WRM Facility Plan. The WRM Facility Plan Guideline, that supports the application of the policy and procedure, provides direction for the development and management of site-specific Facility Plans.

2.2 Governance

The WACHS Infrastructure and Environment Directorate, with the support of Infection Prevention and Control (IPC), Safety and Quality and Work Health Safety programs, are to provide oversight and support to:

- WRM committees, governance, and assurance activities
- be the escalation pathway for matters regarding water risk management for clarification
- review and update this policy and the associated procedure as required.

The WRM Committees are to provide local governance and assurance relating to effective management and control of microbial risks, including:

- overseeing the development and ongoing management of local WRM facility plans, including the annual review and endorsement process
- reviewing adverse test results and follow up corrective actions
- reviewing responses to confirmed clinical cases related to water-borne microbial hazards
- acting as the local escalation pathway for issues requiring clarification or escalation.

3. Roles and Responsibilities

Executive Director – Infrastructure and Environment is responsible for ensuring WACHS has appropriate WRM related policies, procedures, and guidelines in place and provide assurance that Regional WRM Committees are effective in managing microbial hazards.

Director – Infrastructure and Environment is overall person accountable for Water Quality Management across WACHS. Providing assurance that WACHS Water Risk Management Plans and related policies are current and relevant. Responsible for overseeing Regional WRM Committee governance and assurance activities. Escalation pathway for WRM Facility Plans issues and clarification. Accountable for updating WACHS WRM and Control Policy and associated documents.

Regional Executive Directors are to be accountable for ensuring that WRM related policies are adhered to, a WRM Committee is established to oversee planning and assurance activities and all required facilities have WRM Facility Plans that are current, relevant and operationalised locally.

Regional Managers of Infrastructure and Support Services are to be responsible for establishing and maintaining WRM Facility Plans in line with the related policies and Guideline. The WRM Facility Plans require WRM Committee endorsement and oversight.

The **Nominated Responsible Manager for a facility** is responsible for ensuring operational management and response activity aligns to the endorsed WRM Facility Plan with the reporting of activity to WRM Committee.

Other staff as identified in the WRM Facility Plan are responsible for overseeing management and control activity and ensuring appropriate record keeping as defined in the WRM Facility Plan. To ensure sampling, flushing and other response activity is completed in accordance with the water risk management requirements.

All staff are required to comply with the directions in WACHS policies and procedures as per their roles and responsibilities. Guidelines are the recommended course of action for WACHS and staff are expected to use this information to guide practice. If staff are unsure which policies procedures and guidelines apply to their role or scope of practice, and/or are unsure of the application of directions they should consult their manager in the first instance.

4. Monitoring and Evaluation

4.1 Monitoring

To ensure the Policy has been implemented and operationalised effectively, the following monitoring activities are to be used:

- confirmation that WRM committees are established and have approved WRM facility plans in place for each site
- confirmation that responses to detection of cases are reviewed at the WRM committee to determine effectiveness of the WRM facility plan and provided for noting at local clinical governance and work health and safety committee meetings
- response activity to detection or cases to be reviewed on a quarterly basis and provided for WACHS-wide dashboard reporting.

4.2 Evaluation

To evaluate the usefulness of this Policy the following are to be considered:

- responsive to office of the auditor general legionella audit recommendations
- feedback from WRM committee meetings to the effectiveness of response activity to detection or cases
- formal reviews of the WRM procedure and WRM facility plans.

5. References

[AS 4775:2007 Emergency eyewash and shower equipment](#)

[AS 5369:2023 Reprocessing of reusable medical devices and other in health and non-health related facilities](#)

[AS/NZS 3666 SET:2011 Air-handling and water systems of buildings Set](#)

[AS 4276.1:2021 - Water microbiology - Water quality - General requirements and guidance for microbiological examinations by culture \(ISO 8199:2018, MOD\)](#)

[AS 4276.2 -1995 - Water microbiology: Culture media, diluents and reagents \(Reconfirmed 2013\)](#)

[AS 4276.3:2021 - Water microbiology: Enumeration of heterotrophic microorganisms – Pour plate, spread plate, membrane filtration and most probable number techniques](#)

[AS 4276.4 – 1995 - Water microbiology: Coliforms - Estimation of most probable number \(MPN\)](#)

[AS 4276.5 – 2019 - Water microbiology: Coliforms, Escherichia coli and thermotolerant coliforms –Membrane filtration method](#)

[AS 4276.6 – 1995 - Water microbiology: Thermotolerant coliforms and Escherichia coli –Estimation of most probable number \(MPN\)](#)

[AS/NZS 4276.6:2007 - Water microbiology: Coliforms, Escherichia coli and thermotolerant coliforms - Determination of most probable number \(MPN\)](#)

[AS 4276.8 – 1995 - Water microbiology: Faecal streptococci - Estimation of most Probable number \(MPN\)](#)

[AS 4276.9:2019 - Water microbiology: Enterococci in water by membrane filtration using membrane – Enterococcus indoxyl-β-D-glucoside agar \(mEI\)](#)

[AS 4276.12 – 1995 - Water microbiology: Pseudomonas aeruginosa - Estimation of most probable number \(MPN\)](#)

[AS 4276.13:2021 - Water Microbiology: Pseudomonas aeruginosa - Membrane filtration method](#)

[AS 4276.14:2014 - Water microbiology: Detection of Salmonella spp. \(ISO 19250:2010, MOD\)](#)

[AS 4276.15:2014 - Water microbiology: Examination for Vibrio cholerae](#)

[AS 4276.17.1:2016 - Water microbiology: Spores of Clostridium perfringens - Membrane filtration method](#)

[AS 4276.17.2:2016 - Water microbiology: Spores of Clostridium perfringens Estimation of most probable number \(MPN\) using the multiple tube dilution technique](#)

[AS 4276.19:2001 - Water microbiology: Examination for thermophilic Campylobacter spp. Membrane filtration](#)

[AS/NZS 4276.20:2003 - Water microbiology: Examination for coagulase positive Staphylococci, including Staphylococcus aureus, by membrane filtration](#)

[AS 4276.21:2019 - Water microbiology: Examination for coliforms and Escherichia coli –Determination of most probable number \(MPN\) using enzyme hydrolysable substrates \(ISO 9308-2:2012, MOD\)](#)

[AS 4276.22:2019 - Water microbiology: Water quality - Enumeration of Escherichia coli and coliform bacteria - Membrane filtration method for waters with low bacterial background flora \(ISO 9308-1:2014/Amd 1:2016, MOD\)](#)

[AS 4276.23:2016 Water microbiology: Soils, sediments, sludges, slurries and bio-solid. Procedures for sample preparation](#)

National Health and Medical Research Council – [National Water Quality Management Strategy, Australian Drinking Water Guidelines 6 2011](#)

The National Safety and [Quality Health Service \(NSQHS\) Standards](#). 3.01; 3.02; 3.08; 3.10; 3.11; 3.12; 3.14; 3.17 [Accessed 7 August 2024]

[Devereaux BM, Jones D, Wardle E, on behalf of the Infection Control in Endoscopy Committee. Infection Prevention and Control in Endoscopy 2021. Melbourne: Gastroenterological Society of Australia \(GESA\), 2021. \[Accessed 7 August 2024\]](#)

Environmental Health Standing Committee [Guidelines for Legionella control in the operation and maintenance of water distribution systems in health and aged care facilities \(2016\)](#)

Department of Commerce, Department of Mines and Petroleum, [Code of Practice Prevention and control of Legionnaires' Disease \(2010\)](#)

[Environmental Protection Act \(1986\)](#)

Australian Building Codes Board, [Handbook Warm Water Systems \(2020\)](#)

[Health \(Miscellaneous Provisions\) Act 1911, Health \(Air-handling and Water Systems\) Regulations \(1994\)](#)

Office of the Auditor General, [Regulation of Air-handling and Water Systems Report \(2023\)](#)

Australian Building Codes Board [Plumbing Code Research \(Nd\)](#)

[Public Health Act 2016](#)

Department of Health, Licence and Accreditation Regulatory Unit [WA Health Facility Guidelines, Engineering Services \(Nd\)](#)

[Work Health and Safety Act 2020](#)

[Work Health and Safety \(General\) Regulations \(2022\)](#)

6. Definitions

Term	Definition
Water Risk Management and Control Policy	The Water Risk Management and Control Policy (WRM and Control Policy) provides standardised direction in relation to water systems in a consistent manner that complies with all Legislative, Australian New Zealand Standards and Policy requirements.
Water Risk Management Committee – region specific	The Water Risk Management Committee (WRM Committee) – region specific, ensures that operational,

	clinical, and engineering matters are considered in a coordinated, cohesive, cooperative, and holistic way during the process of the development and implementation of WRM Facility Plans and ongoing response to microbial risk.
Water Risk Management Facility Plan	The Water Risk Management Facility Plan (WRM Facility Plan) is required by any facility bound by this policy that details water risk analysis, management, and response in line with the WACHS WRM Procedure
Water Risk Management Facility Plan Guideline	The Water Risk Management Facility Plan Guideline (WRM Facility Plan Guideline) supports the application of the policy and procedure, provides direction for the development and management of site-specific WRM Facility Plans.
Water Risk Management Procedure	The Water Risk Management Procedure (WRM Procedure) provides direction on how facilities are to develop and maintain a WRM Facility Plan and what sites require an endorsed WRM Facility Plan

7. Document Summary

Coverage	WACHS Health Care Facilities, Aged Care Facilities, Renal Hostels or any facility that requires a LARU licence
Audience	Any positions identified in WRM and Control Policy, WRM Procedure and/or WRM Facility Plan that have accountability to water management and/or control in above mentioned facilities.
Records Management	Non-Clinical: Corporate Recordkeeping Compliance Policy
Related Legislation	Health (Miscellaneous Provisions) Act 1911 (WA) Health (Air-handling and Water Systems) Regulations 1994 (WA) Public Health Act 2016 (WA) Work Health and Safety Act 2020 (WA) Work Health and Safety (General) Regulations 2022 (WA)
Related Mandatory Policies / Frameworks	<ul style="list-style-type: none"> • Infrastructure (Asset Management) Framework • Public Health Framework • Risk, Compliance and Audit Framework
Related WACHS Policy Documents	<ul style="list-style-type: none"> • Aseptic Technique Policy • Hand Hygiene Policy • Infection Prevention and Control Policy • Specimen Collection Procedure • Waste Management Policy • Water Risk Management Procedure • Water Risk Management Facility Plan Guideline • Work Health and Safety Policy
Other Related Documents	<ul style="list-style-type: none"> • Australian Building Code Board (ABCB) – Handbook Warm Water Systems (2020) • Australian Building Code Board (ABCB) – Plumbing Code Development Research Report Warm Water Systems (2015) • Code of Practice – Prevention and Control of Legionnaires' Disease (2010) • DoH Western Australian Health Facility Guidelines for Engineering Services (2021) • enHealth Guidelines for Legionella control in the operation and maintenance of water distribution systems in health and aged care facilities (2015) • NHMRC, NRMCC National Water Quality Management Strategy, Australian Drinking Water Guidelines 6 (2011) • OAG Regulation of Air-handling and Water Systems Performance Audit (2023)
Related Forms	Nil
Related Training	Nil

Aboriginal Health Impact Statement Declaration (ISD)	ISD Record ID: 2317
<u>National Safety and Quality Health Service (NSQHS) Standards</u>	3.6, 3.12
<u>Aged Care Quality Standards</u>	Nil
<u>Chief Psychiatrist's Standards for Clinical Care</u>	Nil
Other Standards	<p>Below standards available via the WACHS Library:</p> <ul style="list-style-type: none"> • AS 2031: 2012 Water Quality – Sampling for Microbiological Analysis (ISO 19458:2006, MOD) • AS 4032.3 Water Quality –Valves for the Control of Heated Water Supply Temperatures – Requirements for Field Testing, Maintenance or Replacement of Thermostatic Mixing Valves, Tempering Valves and End of Line Temperature Control Devices • AS/NZS 3500 Set (Parts 0-4):2021 Plumbing and drainage set • AS/NZS 3896:2017 Waters – Examination for Legionella spp. Including Legionella pneumophila • AS/NZS 5667.5:2022 Water quality – Sampling

8. Document Control

Version	Published date	Current from	Summary of changes
1.00	7 August 2024	7 August 2024	<ul style="list-style-type: none"> New contemporary policy required to provide stronger compliance and guidance to water risk management and control, in response to Office of the Auditor General 2022 report findings. This is the overarching policy for the WRM Procedure and WRM Facility Plan Guideline (formerly Legionella Management Procedure and Legionella Management Guideline). This is the overarching policy for the WRM Procedure and WRM Facility Plan Guideline (formerly Legionella Management Procedure and Legionella Management Guideline)
1.01	20 August 2024	20 August 2024	<ul style="list-style-type: none"> Updated references and links

9. Approval

Policy Owner	Executive Director Infrastructure and Environment
Co-approver	Nil
Contact	Asset Manager Infrastructure and Environment
Business Unit	Infrastructure and Environment
EDRMS #	ED-CO-23-340679
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