

Adopting NEBT 2024/03: A 10 Point Action Plan for NHS WSG

In response to NETB 2024/3, NHS Water Safety Groups (WSGs) must take a more proactive and strategic role to safeguard high-risk patients from nontuberculous mycobacteria (NTM) and other waterborne pathogens. Below are the key actions WSGs should consider taking when reviewing and planning to adopt the recommendations of the guidance.

01 Establish and Oversee Project-Specific Water Safety Groups (PWSGs)

Ensure that a Project Water Safety Group (PWSG) is formally established for every new build or major refurbishment,

WSGs must:

- Approve the composition of the PWSG (multidisciplinary, including but not limited to IPC, clinical, estates, AE(W), microbiology)
- Maintain regular communication with the PWSG and oversee decisions made throughout the project life cycle

02 Implement and Audit a Project Water Safety Plan (PWSP)

Collaborate with the PWSG to develop a project-specific Water Safety Plan based on:

- BS 8680 (Water Quality, Water Safety Plans. Code of Practice)
- BS 8580-1 (Legionella risk assessments)
- BS 8580-2 (Water Quality Risk Assessments for *Pseudomonas aeruginosa* and other Waterborne Pathogens)
- HTM:04-01 (All parts)

Ensure the PWSP includes:

- Defined water quality targets
- Commissioning and handover acceptance criteria
- Procedures for component selection, storage, installation, and commissioning
- Multiple barrier control strategies for water safety

03

Strengthen Governance and Oversight

Ensure clear accountability and communication structures between:

- Trust Board
- SRO/Executive Director
- PWSG and WSG
- Escalate concerns and deviations from safety requirements to the Board
- Ensure appropriate risk registers are maintained and reviewed at each project stage

04

Risk Assess All Water-Related Activities for High-Risk Patients

Identify and regularly review all high-risk clinical areas and activities (e.g., transplant wards, haematology, cystic fibrosis units).

- Apply precautionary principles even where scientific certainty is lacking
- Assess the suitability of outlets, (e.g. showers, basins) and mitigate risks from splash, aerosols, or drainage

05

Review and Update Policies on Component Selection and Procurement

Require that no fittings, equipment, or materials be used if:

- They have been wet-tested or previously used
- They are non-certified for microbiological safety
- Collaborate with procurement to ensure tender specifications align with water safety requirements

06

Champion and Monitor Training and Competence

Ensure all stakeholders receive appropriate training on water hygiene risks, including:

- WSG members
- PWSG members
- Designers, contractors, and estates teams
- Maintain records of training and competence assessments

07

Monitor Water System Performance and Post-Commissioning Validation

Ensure enhanced sampling, flushing, and validation protocols are in place during and after commissioning.

- Validate performance against PWSP criteria before handover
- Include water quality data in the estate's digital asset management tools (e.g., BIM)

08

Apply the Guidance to Existing Estates Where Feasible

Review existing high-risk areas and, where infrastructure allows:

- Retrofit point-of-use filters
- Modify or remove outlets
- Implement temporary risk mitigation strategies

09

Support and Facilitate Incident Reporting and Learning

Encourage a 'no-blame' culture for reporting contamination risks, failures, or near misses. Ensure findings are documented and shared internally and across NHS estates to promote sector-wide learning.

10

Prepare for the Updated HTM: 04-01

Begin gap analysis of current systems, skills, and governance in preparation for the full revision of HTM: 04-01. Engage with AE(W)s and subject matter experts to align existing practices with future competency frameworks. These actions will enable WSGs to transition from a passive compliance role to a central leadership function in the design, operation, and assurance of safe water systems for vulnerable patients.