



Specifying compliant bathing equipment

Reval Continuing Care MD, Jason Ashman, discusses the importance of only purchasing compliant water fittings for use in healthcare settings – with a particular focus on assisted bathing equipment – and sets out some of the key things that potential purchasers of such products should look out for.

Water compliance is especially important in a healthcare, hospital, or care home setting, but through our discussions with the sector it's become clear that not many understand what is required. Bringing clarity and understanding to the requirements that must be upheld can be described in a nutshell: 'Any water fitting, which when installed, will carry or receive water from the public mains water supply in the UK', must comply with the Water Supply (Water Fittings) Regulations. These require that a water fitting should not cause waste, misuse, undue consumption, or contamination of the water supply, and must be 'of an appropriate quality and standard'.

So, how do healthcare providers ensure that they are meeting these requirements when specifying bathing apparatus and equipment? The only way is to request compliance certificates from potential suppliers when purchasing bathroom appliances. While all water fittings and associated materials must by law conform with the Water Supply Regulations 1999,¹ there is no legal requirement to obtain WRAS approval; it is simply the easiest and most reliable way of demonstrating compliance. According to the Water Supply Regulations, it is down to the installer to ensure that water fittings meet the criteria. WRAS approval provides valuable peace of mind, both for you and your customers.

Healthcare providers need to be confident that the equipment they purchase is of the highest quality – to ensure reliability and service continuity while meeting stringent quality standards and legal requirements. The materials and components of construction used in assisted bathing systems must be tested and subjected to the water industry's WRAS Category 5 standard. This is to demonstrate the compliance with WRAS category 5 and BS6920.

Marketing a product and stating that it has WRAS-approved components incorporated does not guarantee

compliance. Moreover, such language should serve as a warning, and companies referring to WRAS-approved components as a key selling point should be carefully scrutinised prior to purchasing from them.

The only way that, say, a healthcare engineer can be assured of equipment compliance is for the prospective supplier to provide them with a Water Regulatory Advisory Scheme (WRAS) Category 5 certificate of approval. That approval must have a live listing on the online WRAS Approvals Directory. Here at Reval we provide our Category 5 certificate complete with approval number with the appliance. If a product is not listed, then you should question the approval with WRAS for verification.

In the absence of an authentic certificate and directory listing of approval, the appliance cannot be legally installed to UK mains water. The only way would be via a special dispensation from your local water authority, which is highly unlikely, as BS6920 is a British Standard.

Contacting the local water authority

It is the responsibility of the care operator or healthcare provider to contact the local water authority and provide product details to secure the necessary approval for appliance installation. No one tells you to insure your car, but you know you have to do it, and here it is exactly the same. Here the Water Regulations UK outline how to comply, as follows: '1) Ensure that the equipment is of an appropriate quality and standard. 2) Ensure that the installation is safe by notifying the local water undertaker at least 10 working days before the equipment is installed. 3) To prevent bathing and wastewater contaminating drinking water supplies, install the correct level of backflow protection.'²



A photo taken by Reval when removing a non-compliant bathing appliance – clearly illustrating the risks of specifying systems not fit for purpose.

The Water Regs continue: 'Bathing equipment in hospitals, nursing, and care homes is categorised as a fluid Category 5 risk, a serious health hazard. To protect patients, residents, and staff, as well as the wider community, the supplies to all tap and shower outlets must be protected by a backflow arrangement rated as providing fluid Category 5 protection.'²

An example of where backflow can occur is when taps and shower handsets are dipped or left submerged in bathwater and the water supply pressure drops. This action causes a vacuum in the appliance's pipework. The vacuum action will then back-siphon the bathwater along with any of the bather's pathogens, bacteria, soaps, and emollients, transferred during bathing, into the building's freshwater ring main. These pathogens can potentially find their way through an entire building plumbing system if safety devices are not installed, and can potentially be discharged anywhere in your building, such as into a washbasin, or a kitchen sink where food



The Reval Cocoon therapy bath.

and drink are being prepared.

This level of contamination risk also threatens and potentially extends to adjacent buildings connected to the same mains water supply, potentially causing downstream contamination and health and safety hazards to others. In the event that an operator is found to be the source of the contamination, costs and fines can be imposed based on the level of contamination clean-up, and the impact to health and safety caused etc. The typical cost of a contaminated zone clean-up is likely to be considerable, and on top of this, of course, is the reputational damage. Non-compliance might also have potential insurance implications with respect to owners and operators found to be responsible for contamination caused by a non-compliant appliance.

Request evidence

To ensure peace of mind and compliance, healthcare providers should request evidence that bathing appliances are compliant, and tested against all appropriate standards, as previously highlighted. One possible and effective solution could be for the Care Quality Commission to incorporate compliance via category 5/BS6920 certification into its inspection process.

There are three key things to bear in mind that you need to do as a provider of healthcare services with responsibility for the facility's water system:

- Understand the regulations and guidance.
- Comply with the regulations.
- Uphold your duty of care to staff, patients/residents, by being aware of the compliance.

Due to the inherent vulnerabilities in and hospital and care home settings, the likelihood of contamination and infection outbreaks is increased. Those who are cared for should expect to be safe from exposure to infections. So, how can that be achieved in an environment where multiples of individuals may use the same bathing facilities?

Those operating in healthcare premises have a duty to comply with the Water Regulations and ensure that medical appliances are procured to assure the higher level of Fluid Category 5 backflow protection. Fluid Category 5 represents a serious health hazard because of the concentration of pathogenic organisms, or very toxic substances, including any fluid which contains faecal material or other human waste etc.

As such, Category 5 defines a serious health risk, and appliances must be:

- Designed and manufactured to be of an appropriate quality and standard.
- Suitable for the circumstances where they are used.
- Installed so they comply with the regulations.

Amazingly, there are numerous non-approved or compliant appliances marketed, sold, and installed in the UK healthcare sector. The very fact this is happening raises a lot of interesting questions, especially for those responsible for policing the standard.

Technical compliance at this level is a 'dark art', but free and impartial help and advice is on hand simply by going to



Reval's Caprice variable height bath is designed to make light and easy work of patient transfers.

the Water Regs UK: www.waterregsuk.co.uk and WRAS Approvals: <https://www.wrasapprovals.co.uk> websites, where you can read and learn more about the materials, standards, and certification process and requirements. It is time to be better educated on this standard, because it will help everyone keep patients and residents safe and companies compliant. Understanding the regulations is a starting point, but it's the follow through with tangible actions that truly makes the difference.

Consider the ramifications of using non-compliant appliances in a care home or healthcare setting bathroom; not only does it pose a safety risk, but it could also lead to an offence or a cost consequence when you are instructed to remove the appliance. Given all that, it might be worth checking your appliances, just to be on safe side. **hej**

References

- 1 **Water Industry, England and Wales. The Water Supply (Water Fittings) Regulations 1999. 1 July 1999.** <https://tinyurl.com/32vjmtcr>
- 2 **WaterRegsUK. Assisted bathing equipment. April 2023 v1.3** <https://tinyurl.com/5dynkchm>

Jason Ashman

Reval Continuing Care's managing director, Jason Ashman's career in the assistive equipment sector began in 1981 with Zimmer Orthopaedic, which subsequently evolved through several mergers and acquisitions, becoming Everest & Jennings, Carters J&A, and finally Invacare UK. Over 22 years at Invacare, Jason held nine different positions, initially spending a decade as a technician in power product R&D and overseeing power product production. He then advanced to several leadership roles, including key account management, and serving as the National Sales manager for the UK and Ireland.

In 2004, he moved to Group-Reval, taking on the role of MD with a mission to globalise the business. He successfully established a foothold in the UK market, set up a subsidiary, and leveraged the strength of the company's products to tap into emerging markets worldwide. Under his leadership, Reval now exports to 40 countries across all continents. Reval has been manufacturing bespoke hydrotherapy pools, transfer equipment, 'innovative' medical baths, shower and toileting appliances, and posture management equipment, for 48 years.





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