

Water Safety Policy

Summary	This policy covers the management and control of Legionella in water systems in our properties.
Who to Contact	Head of Customer Safety
Effective from	17 July 2020
Planned review date	Annually (or more frequently if legislation changes)
Version Number	1.0

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1. Purpose and scope

1.1. This policy covers the management and control of Legionella in water systems in all residential and commercial properties owned and managed by Southern Housing Group (the Group). The Group is committed to ensuring that our residents' homes, offices and commercial properties are safe and secure places to live and work in.

1.1. When we use the terms 'we', 'our' and 'us' we mean Southern Housing Group.

1.2. Legionella bacteria can cause Legionnaires' disease, a potentially fatal form of pneumonia and everyone is susceptible to infection. For Legionnaires' disease to develop, the Legionella bacteria (specifically Legionella pneumophila) is water borne and is usually transferred by inhalation of water droplets. Under normal conditions, the disease cannot be passed from one person to another.

1.3. Together with industry and other relevant stakeholders, UKAS (the UK's National Accreditation Body, responsible for determining, in the public interest, the technical competence and integrity of organisations such as those offering testing, calibration and certification services) has helped to develop a framework for accrediting Legionella risk assessments under both ISO/IEC 17020 (general criteria for the operation of various types of bodies performing inspection) and British Standard BS 8580:2010 (Water Quality – Risk assessments for Legionella control – Code of Practice). The British Standard has been produced in order to underpin The Health and Safety Executive (HSE) approved code of practice (ACoP) and guidance document L8 (Legionnaires' Disease: The control of Legionella bacteria in water systems).

2. Policy statement

2.1. The Group accepts it has a responsibility under the Health and Safety at Work Act and the Control of Substances Hazardous to Health Regulations 2002 (COSHH) to take all reasonable precautions to ensure the water storage systems within its control are safe and to prevent or control the harmful effects of contaminated water (i.e. Legionella) to residents, employees and other persons working at or using its premises.

2.2. We are committed to meeting our obligations as a responsible person under all relevant legislation and statutory guidance, to provide safe homes for our residents, safe workplaces for our employees and ensures safety for visitors.

3. Our commitments

3.1. We will ensure so far as reasonably practicable that residents and all lawful visitors to our properties are not exposed to any risks to their health or safety in relation to water. We will carry out our individual and collective duties by:

- Identifying and assessing sources of risk
- understanding and complying with all relevant legislation including the requirements of COSHH;
- undertaking Legionella risk assessments for all properties, offices and blocks with shared water supplies at least every two years and more frequently where the risk assessment suggests it, and deliver monitoring and management programmes as required;

- the provision of suitable, sufficient and risk appropriate precautions to prevent or minimise the risk of exposure to Legionella;
- keeping records of the precautions implemented for each of the premises within the Group's control;
- maintaining an operational risk management approach;
- communicating key compliance messages;
- engaging openly and proactively with our regulators and other stakeholders;
- carrying out remediation and monitoring actions as identified within the appropriate timescales;
- using competent and skilled contractors and monitoring the performance of these contractors on an ongoing, regular basis;
- inspecting/checking water infrastructure at change of tenancy;
- maintaining accurate asset records and data;
- having skilled and well-trained staff;
- seeking independent assurance and challenge on our performance; and
- reporting on our performance including internal checks and audits to the Board.

3.2. Full details of our management plan for ensuring safety from Legionella is provided in our Legionella Procedure, including the process to be followed in the event of a legionella outbreak or positive legionella test result.

3.3. A detailed list of legal requirements and guidance is detailed in Appendix 1.

4. Roles and responsibilities

- 4.1 The Property Maintenance and Investment Director is responsible for ensuring the overall effectiveness, maintenance and implementation of this policy on behalf of the Group, as defined in the Health and Safety Executive's Approved Code of Practice for controlling the risk of legionnaire's disease L8 (fourth edition) and other relevant health and safety legislation and guidance.
- 4.2 The Head of Customer Safety is responsible for the delivery of water safety across our properties. The Head of Customer Safety holds the budget for water safety, provides technical and engineering oversight, support and advice and ensures that the teams delivering and maintaining water safety are supported in carrying out their duties.
- 4.3 Homes Service Managers, estate care staff and surveyors support remedial activities as required and contractors in accessing properties to carry out necessary works.
- 4.4 Records of inspections and data, inspection regimes and operations are maintained by the Maintenance and Servicing & Asset Control Managers, who oversee the work of contractors, under the management of the Head of Customer Safety.
- 4.5 The Customer Service Centre log reports from customers of problems and pass them on to the Maintenance and Servicing Teams. Out of hours incidents and business continuity problems are reported through the Customer Service Centre or contractors and escalated through the Group's Out of Hours procedures.

- 4.6 For buildings developed by Southern Housing Group, the Executive Director Growth and Development and their team are responsible for ensuring that new buildings comply with Building Regulations and all relevant health and safety legislation to ensure water safety.

5. Measuring compliance

5.1. The Head of Customer Safety will regularly report to the Executive Management Team and Customer Safety Committee on the progress and performance of the Water Risk Assessment programme, in accordance with approved Key Performance Indicators (KPIs) which shall include:

- The Water Risk Assessment Programme.
- Completion of water risk assessment identified remedial actions against an action plan for completion.
- Water risk assessment actions that are overdue
- Water monitoring and testing regimes

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Approval date	11 February 2020
Approved by	Customer Safety Committee
Policy Owner	Director of Building Safety

Appendix 1 - Legislation, regulation and guidance

Area	Explanation
Landlord and Tenant Act 1985	“...keep in repair and proper working order the installations in the dwelling house for water, gas and electricity...”
Control of Substances Hazardous to Health Act (COSHH) 2002	These require employers to manage the risk of hazardous substances, including biological agents such as Legionella. Regulation 7 requires measures to control the risk.
Defective Premises Act 1972	Section 4 places a ‘duty of care’ on the landlord in relation to any person who might be affected by a defect which would result in personal injury or damage to their property.
Health and Safety at Work Act 1974	Sections 2 and 3 require employers to, as far as reasonably practicable, reduce health and safety risks to employees, and those not in their employment but who may be affected by their activities
The Management of Health and Safety at Work Regulations 1999	This requires employers to complete a suitable and sufficient assessment of the risk to employees, and those not in their employment but who may be affected by their activities.
Building regulations - Approved Document G (Mar 2016)	Provides guidance on the supply of water to a property, including water safety, hot water supply, sanitation and water efficiency i.e. an easily accessible water supply that doesn’t incur wastage.
Approved Code of Practice L8 – Legionnaires Disease – The control of Legionella bacteria in water systems.	This is the HSE’s approved code of practice for managing Legionella. Whilst this is not a piece of legislation, it is considered by the courts and the enforcing bodies as a definitive guide and should be followed (it is essentially practical advice on how to comply with the law). It has what is known as quasi-legal status – i.e. it should be complied with and if you do not, you will need to be able to show that you have complied with the law in another way.