

Water Hygiene and Safety Policy



Reference:	HS_POL_ASM_WH_1.3	Author:	Samantha Carty
Scope:	Housing Services Properties/Staff and Contractors	Approved by:	Executive Team
Legislation:	Health and Safety at Work Act 1974 The Management of Health and Safety at Work Regulations 1999 Control of substances Hazardous to Health Regulations 2002 Approved Code of Practise (ACOP) L8 Legionnaires' disease 2013 Private Water Supplies Regulations 2009	Date of approval:	28 th April 2022
Regulatory/ Governance:	Regulator of Social Housing Home Standard	Date of next review:	April 2025
Related Policies:	Health and Safety Policy Repairs & Maintenance Policy Planned Maintenance Investment Policy Access Policy Empty Homes Policy		

1. Policy Statement

- 1.1 This policy provides guidance on the methods by which Housing Solutions will endeavour to control water hygiene and safety. The policy covers the premises and systems it manages or systems over which it has reasonable control.
- 1.2 Housing Solutions will take all reasonable steps to manage and establish effective systems to manage water hygiene within our properties.
- 1.3 This document has been produced in partnership with H2O Nationwide, who have acted as Housing Solutions external health and safety advisors on water hygiene.

2. Scope

- 2.1 The scope of this policy is applicable to all non-domestic buildings managed and maintained by the group. The following buildings are deemed to be non-domestic premises.

Non-Domestic Premises
Housing Solutions offices & administrative buildings Registered care homes Sheltered Housing – communal facilities Common parts of multi-let buildings Void properties currently undergoing works Void buildings / premises

- 2.2 Although there is no requirement to test the water hygiene in void properties, as part of our commitment to providing safe homes, we will check for waterborne disease during every void period.
- 2.3 Where Housing Solutions let commercial buildings/premises, it is deemed the responsibility of the tenant to carry out their duties to water hygiene.

3. Roles and Responsibilities

- 3.1 A high level overview of roles and responsibilities can be found below. Further detail can be found in the Water Hygiene Procedure in Appendix 1.

Role/Team	Responsibilities
Board	Strategic overview of all HS Policies
Group Chief Executive	Overall responsibility to the HS Board for the control of the Water Hygiene Policy and Management Systems.
Director of Property and Development	Responsible for ensuring that the policy is fully implemented and that the Chief Executive and Executive Team is kept informed of required resources and incidents* in relation to the policy.
Head of Asset Management	Ensure that all persons are provided with the necessary information, instruction and training to fulfil their roles and responsibilities under this policy and procedures.
Fire and Health & Safety Manager	Take control to control of waterborne disease outbreak and responsible for appointing a person to take control and to

	<p>coordinate activities with the HSE and other relevant bodies.</p> <p>Notify the HSE upon receipt of a diagnosis of a water borne infection.</p>
Compliance Manager	<p>Responsibility to the Head of Asset Management in ensuring that the policy is fully implemented and immediately informed regarding any issues* in implementing the policy and required resources/training.</p> <p>Responsible for ensuring technical, maintenance, property management staff and contractors have received adequate information, instruction and training on the prevention and control of water hygiene and that they comply fully with the policy and procedure and are working safely in accordance with the policy.</p> <p>Responsible for ensuring that routine monitoring and preventative and precautionary measures are undertaken in accordance with the policy and that appropriate actions are taken in the event of an emergency.</p> <p>Responsible for ensuring that immediate action is taken where staff/contractors are not working safely or complying with HS policy.</p> <p>The Compliance Manager is to ensure that there is a nominated contractor who is capable of competently conducting:</p> <ul style="list-style-type: none"> - Risk assessments and provision of scheme of control for the prevention and control of the risks from water borne infections. - Plumbing and engineering works on air conditioning and hot and cold-water systems; and - The cleaning of water systems and chemical treatment of water supplies; and bacterial and chemical water testing and analysis. <p>Ensure that all records are to be kept for five years from the date of the last entry and are available on demand for inspection by internal auditors.</p> <p>Ensure the list of Private Distribution Network sites are maintained as new properties are added/removed. Carry out an annual review of sites.</p>
Property/Scheme (Home) Managers (Inc. Sheltered)/ Trade Supervisors/	<p>Responsible to the Head of Asset Management/ Compliance Manager for the Day-to-day implementation of the policy. The Property/Scheme Manager to ensure that</p>

Supported Team Leaders/Extra Care Housing Officers/Sheltered Housing Officers	<p>routine monitoring, precautionary and preventative measures are undertaken in line with HS policy.</p> <p>Any issues* in the implementation of the policy are immediately reported to the Head of Asset Management/ Compliance Manager</p>
<p><i>*Incidents that may affect the image or reputation of Housing Solutions, or may lead to enforcement action, criminal prosecution or civil action being taken against Housing Solutions</i></p>	

4. Definitions

- 4.1 **PDN:** Private Distribution Network
- 4.2 **ACOP:** Approved Code of Practice
- 4.3 **HSG:** Health and Safety Guidance
- 4.4 **TMV:** Thermostatic Mixing Valve
- 4.5 **Legionnaires disease:** a lung infection transmissible from the inhalation of water droplets from air conditioning units or hot tubs.

5. Legislation

- 5.1 Criminal liability for a waterborne disease outbreak or individual deaths or illness would fall under the following legislation:
 - Health and Safety at Work Act 1974, s2-7
 - Control of Substances Hazardous to Health Regulations 2002
- 5.2 The Health and Safety at Work Act 1974 and its supporting regulations do not apply to domestic premises. Failure to comply with these laws is a criminal act that could result in unlimited fines for Housing Solutions and possibly fines and imprisonment for directors and senior managers found to be individually culpable.
- 5.3 In addition to the criminal liability, there would be potential liability for breach of contract and negligence. These could result in withdrawal or limitation of insurance cover.
- 5.4 In January 2010, the Private Water Supplies Regulations 1991 were replaced with new Regulations in order to meet the requirements of European Council Directive 98/83/EC in respect of private drinking water supplies. The Private Water Supplies Regulations 2009 have been designed to provide improved health protection for consumers of private water supplies and consumers of food produced or prepared using private water supplies.
- 5.5 This policy has been developed to allow Housing Solutions to comply with the Control of Substances Hazardous to Health Regulations 2002 and has regard to Approved Code of Practice L8 'Legionnaires' disease: The control of Legionella bacteria in water systems.' And HSG274 (Legionnaires Disease technical Guidance).

6. Water Hygiene

- 6.1 Housing Solutions will maintain an open information policy and will work with residents, staff groups, contractors and statutory bodies to agree and deliver solutions to water hygiene issues.
- 6.2 Where applicable, we will endeavour to work with management agents to obtain water hygiene risk assessments and ensure compliance with actions from these.
- 6.3 Housing Solutions will implement its policy through a clear internal structure as set out in the roles and responsibilities in section 3 of this policy document.
- 6.4 If water hygiene issues pose a serious or imminent risk to the health of persons, Housing Solutions will take all practical measures as soon as possible to control the risk.
- 6.5 If there is a risk of waterborne disease, but the risk is not serious or imminent, Housing Solutions will take all reasonably practical measures to control the risk of water borne disease.
- 6.6 Whilst the risk of waterborne disease is present, Housing Solutions shall ensure that it is managed in such a manner that the risk to the health of our customers, employees, contractors, visitors and other peoples using our premises is minimised.
- 6.7 All work to prevent or the control risk of waterborne disease shall be carried out in accordance with the current legal standards using the best working practices.
- 6.8 If you have any doubts or questions about this policy or procedures, please contact your manager who will be able to provide you with advice or further information.
- 6.9 This document is not intended to provide detailed technical guidance on handling and dealing with waterborne diseases. Staff should refer to the appropriate HSE guidance. Lists of all current HSE publications may be obtained from the HSE Website. Lead staff will be trained to be competent to manage water hygiene in buildings. Copies of all relevant publications will be issued to all staff trained by Housing Solutions.
- 6.10 The Health and Safety Executive has produced a number of Approved Codes of Practice and a number of Technical Guidance Notes. Compliance with all relevant regulations and guidance is necessary so that all work involving water hygiene can be carried out safely without any risk to any person.

7. Procedure

- 7.1 Water hygiene is managed through staff training, risk assessments, inspections and monitoring as well as other remedial actions. The Procedure is detailed in Appendix 1.

8. Equality & Diversity

- 8.1 HS recognises the needs of a diverse population and always acts within the scope of its own Equality, Diversity and Inclusion Policy, the Human Rights Act 1998 and the Equalities Act 2010. HS works closely with its partners to ensure it has a clear understanding of its resident community with clear regularly updated service user profiles. HS will record, analyse and monitor information on ethnicity, vulnerability and disability.

9. Confidentiality

- 9.1 Under the Data Protection Act 2018, General Data Protection Regulation (GDPR) and the Human Rights Act 1998, all personal and sensitive organisational information, however received, is treated as confidential. This includes:
- anything of a personal nature that is not a matter of public record about a resident, client, applicant, staff or board member
 - sensitive organisational information.
- 9.2 HS employees will ensure that they only involve other agencies and share information where there is a legal basis for processing the information.

10. Review

- 10.1 This policy will be reviewed on a 3 yearly basis or more frequently in response to changes in legislation, regulatory guidance, good practice or changes in other relevant Housing Solutions' policy.
- 10.2 Our performance in relation to the delivery of the services and activities set out in this policy will be monitored on an ongoing basis through our established reporting mechanisms to our Senior Management Team, Executive Team, Board and associated committees.

11. Appendices

- 11.1 Appendix 1: Procedure

Appendix 1: Procedure

1. Staff Training

- 1.1. All technical staff (employed and sub-contractors) providing technical services to high-risk properties are to attend Water hygiene awareness training at least once every three years.
- 1.2. Training will be provided through tool box talks and training videos, such as <https://youtu.be/JoNh7BB4N70>
- 1.3. Water hygiene awareness training shall include the following topics in appropriate detail, by means of both written and oral presentation, and by demonstration as necessary:
 - 1.3.1. the health risk from waterborne infections.
 - 1.3.2. the facts affecting the risk of growth and infection by waterborne infections.
 - 1.3.3. the general procedures to be followed to deal with an emergency; and
 - 1.3.4. how to avoid the risks from waterborne infection.

2. Nominated Competent Persons

- 2.1. The nominated competent person will be our current water hygiene management provider. They will provide support and advice along with risk assessments, monitoring and sampling.

3. Risk Assessments

- 3.1. The purpose of risk assessments is to establish the risk of waterborne infections. Domestic buildings will undergo a written risk assessment at void stage, with a programme for all domestic homes to be risk assessed in the next 10 years. The buildings classed as non-domestic will be assessed every 2 years.

4. Site Inspections

- 4.1. The Compliance Manager is to arrange for a site inspection of the hot and cold-water storage and distribution systems, and for a risk assessment to be produced for all properties, where there is a need for a full site survey and risk assessment.
- 4.2. Site inspections and risk assessments must be carried out by a competent specialist water hygiene consultant or other competent person.
- 4.3. The inspection shall comply with the requirements of L8 - Approved Code of Practice and Guidance: Legionnaires Disease: The control of Legionella bacteria in water systems and BSRIA Guide to Legionellosis - Risk Assessment Application Guide AG 20/2000, along with the requirements outlined in BS8580-1:2019.
- 4.4. The Compliance Manager is to instruct the specialist water hygiene consultants to carry out a site inspection of the hot and cold-water systems in the non-domestic parts of designated premises to:
 - 4.4.1. Produce a risk assessment having regard to the occupancy of the premises
 - 4.4.2. Prepare a detailed written scheme of control to manage the water installation at the premises that includes a schematic diagram of the hot and cold-water systems
 - 4.4.3. Make recommendations about:

- 4.4.3.1. Measures needed to remedy deficiencies in the hot and cold-water systems
- 4.4.3.2. The preventative and precautionary measures needed to prevent waterborne bacteria growth and distribution
- 4.4.3.3. The specific monitoring scheme required at the premises

5. Written Scheme of control

- 5.1. Where the water consultant concludes that the risk of waterborne infections is insignificant and that no further works are required then this shall be recorded in the water hygiene register.
- 5.2. Where the water consultant concludes that there is a significant risk of waterborne infections, the findings of the inspection and risk assessments are to be recorded in a written scheme of control for the property. This written scheme of control is in electronic format and accessible via a secure portal and will include:
 - 5.2.1. Details of hot and cold-water systems and wet air conditioning systems, including up-to-date plans or schematic diagrams.
 - 5.2.2. Details of who is responsible for managing the property and carrying out maintenance works.
 - 5.2.3. Details of the safe and correct operation of relevant systems.
 - 5.2.4. Details of what control methods and precautionary measures are to be taken; and
 - 5.2.5. Details of the frequency and type of checks that are required.
- 5.3. The written scheme of control is to be available in the property and is to be kept up to date at all times. All persons with any duty in the written scheme of control including contractors are to be informed of the presence and location of the written scheme of control.

6. Remedial Actions

- 6.1. The Compliance Manager is to ensure that the system is maintained in good repair and kept clean. The Scheme/home Manager is to ensure that all routine measures detailed in the written scheme of control are implemented, in accordance with the required time intervals, and that accurate, complete and up to date records are kept
- 6.2. If the Scheme/home Manager decides, upon the findings of a site inspection, that the risks are insignificant then this shall be recorded in the water hygiene register.
- 6.3. If risks are identified then staff must be provided with information, instruction and training to implement the written scheme of control for that property and resources must be allocated to ensure proper controls are introduced. Specific controls for at risk properties will be detailed in the logbook for that property. Controls may include taking any of the following measures to prevent the growth of waterborne diseases within the water system:
 - 6.3.1. Carrying out maintenance or remedial works on the system.
 - 6.3.2. Disinfecting of the system
 - 6.3.3. Keeping water cisterns covered, insulated, clean and free of debris.

- 6.3.4. Ensuring water cannot stagnate anywhere in the system, e.g., remove redundant pipe work, run taps/showers in unoccupied rooms.
- 6.3.5. Insulating pipe work.
- 6.3.6. Maintaining the correct temperature at the hot water cylinder.
- 6.3.7. Advising personnel working on the system about the risks and how to minimise them; and
- 6.3.8. Advising residents about the risks, the control measures and precautions that can be taken, such as flushing through showers following a period of non-use.
- 6.4. All routine measures detailed in the written scheme are to be implemented, in accordance with the required time intervals. Accurate, complete and up to date records are to be kept and will be recorded via the online portal.

7. Water hygiene risk register

- 7.1. The Compliance Manager shall ensure a record of the findings of any site inspection and risk assessment in the water hygiene risk register.

8. Review of risk assessments and written scheme of control

- 8.1. The Compliance Manager is to ensure that the risk assessment and written scheme of control are reviewed, and amended every 2 years (non-domestic) or when:
 - 8.1.1. Significant changes are planned or have been made to a system, e.g., remedial works or planned modifications have been implemented
 - 8.1.2. Changes have been made to the management and/or maintenance of the system, e.g., 6 months after a new maintenance company has been appointed.
 - 8.1.3. Significant changes have occurred in the way a system is being used, e.g., a formerly fully occupied building is now only partially occupied.
 - 8.1.4. In the event of any reported waterborne infections to persons.

9. Action to be taken in the event of an outbreak

- 9.1 In event of being notified of an outbreak, an outbreak is defined as two or more cases where the onset of illness is closely linked in time (weeks rather than months) and where there is epidemiological evidence of a common source of infection, (with or without microbiological evidence) and from a Housing Solutions property the Compliance Manager is to immediately notify the following persons:
 - 9.1.1. The Director of Property and Development
 - 9.1.2. The Head of Asset Management
 - 9.1.3. Fire and Health & Safety Manager
 - 9.1.4. Nominated Contractor
- 9.2. The Compliance Manager is to take control to control the outbreak and is responsible for appointing a person to take control and to coordinate activities with the HSE and other relevant bodies. Housing Solutions' H&S officer/responsible person is to notify the HSE upon receipt of a diagnosis of a waterborne infection.

9.3. All other persons are to follow instructions of the Health & Safety and Fire Manager or their designated representative. No person is to make contact with the press or make any interviews unless authorised by the PR and Marketing Manager.

10. Risk Assessment

10.1. The Compliance Manager or appointed deputy is to work the Local Authority Environmental Health Team to produce a risk assessment for any private water distribution network managed by Housing Solutions.

10.2. The results of any risk assessment will be recorded in a register. The outcome of the risk assessment will determine the type and frequency of sampling and analysis required.

11. Sampling and analysis

11.1. The Compliance Manager will implement any sampling and analysis required as the result of any risk assessment. Any difficulties in implementing this will be immediately reported to the Head of Asset Management who will inform the Director of Property and Development.

12. Audit

12.1. The Water Hygiene Safety Management procedures will be audited as per the following table:

Audit Type	Frequency	Responsible Person
Property check*	Quarterly	Compliance Manager
External audit carried out by external auditors	Bi-annually	Operations Director

*To ensure that all properties that require a risk assessment are recorded on the master database with a date for re-inspection.

12.2. The Director for Property and Development must record the findings of an audit. The system should be amended to incorporate the findings of an audit.

12.3. The Compliance Manager is to ensure that proper records are maintained and available on demand for inspection by internal auditors.

12.4. Audits are to be conducted using the current edition of Control of Legionella bacteria in water systems: Audit Checklists. ISBN 0-7176-2198-7

13. Records

13.1. The Compliance Manager is to ensure that all records are to be kept for five years from the date of the last entry.

14. Performance indicators

14.1. The Compliance Manager will be responsible for reporting the following key performance indicators through the monthly compliance report to the Senior and Executive management teams.

- 14.1.1. All sites have a valid water hygiene risk assessments – target 100%
- 14.1.2. All remedial actions for risk assessments conducted.

15. Complaints

- 15.1. All customer complaints relating to Water Hygiene and Hot Water safety will be logged as per the company's complaints policy and procedures.

16. Additional information and links:

- 16.1. Health and Safety Executive website:
<http://www.hse.gov.uk/legionnaires/index.htm>
- 16.2. Public Health Laboratory Service (PHLS) website:
http://www.phls.org.uk/topics_az/legionella/menu.htm

Appendix 2: Private Distribution Networks

1. Private water distribution networks

- 1.1. A private distribution network (PDN) is classified as a portable water network within the boundary of a private site – a ‘network’ being a water supply pipe that has rising mains in more than one building, and ‘wholesome water’ being that used for drinking, cooking and washing. If the supply pipe connected to the water company main feeds a single building, then this is not a network however if it goes on to supply additional buildings around a site then the new regulations may apply.
- 1.2. Housing Solutions will review the PDN list annually.
- 1.3. All PDNs under Housing Associations responsibility will check the pressure annually as required.