

## Water Hygiene Policy Statement

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Version	Author	Date	Review Date	Comments/amendments
1.0	Emma Jorgenson	05/2019	05/2022	
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## 1. Policy Statement

believe housing is committed to providing a safe environment for its employees, customers, visitors, and contractors. Part of this responsibility is to manage the risks associated with legionella bacteria so far as is reasonably practicable. We recognise our legal obligations in relation to legionella and will operate in accordance with all current legislation and approved codes of practice. We will also provide customers with advice and guidance on how to protect themselves and visitors from legionella bacteria and will act upon any concerns reported by customers.

The purpose of this policy is to ensure we take the necessary precautions to fulfil our legal obligations towards legionella in relation to relevant premises

## 2. Policy Aims

Legionella is a potential hazard to all believe housing assets containing water systems. The aim of this policy is to provide a legionella control strategy to reduce the risk as low as is reasonably possible.

We understand our obligations and will ensure that the risk of legionella bacteria is managed in accordance with current legislations and guidance. This includes but is not limited to:

- Health and Safety at Work etc Act 1974
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Management of Health and Safety at Work Regulations 1999
- Water Supply (Water Fittings) Regulations 1999
- Approved Code of Practice Legionnaires disease: the control of legionella bacteria in water systems 2013
- HSG274 Part 2: The control of legionella bacteria in hot and cold water systems 2014
- HSG 274 Part 3: The control of legionella bacteria in other risk systems 2014
- BS8580-1 Water quality – Risk assessments for Legionella control 2019
- BS8680 Water quality - Water safety plans 2020
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

The key objectives of this policy are to ensure:

- The responsibilities of believe housing to our customers, employees, visitors, and contractors are defined.
- Suitable and sufficient resources to manage legionella are available
- Suitable and sufficient governance arrangements are in place to manage all legionella control matters.
- Legionella risk assessments, and monitoring programmes are completed for all required properties within suitable timeframes.
- Actions raised from the risk assessments and monitoring programmes are managed and closed out effectively.
- Legionella risk assessments undergo an annual desk top review.
- Responsibility for legionella control within believe housing is clearly defined and those responsible for legionella control are fully aware of their responsibilities are suitably trained to complete them.
- Records regarding legionella control are retained for a minimum of five years.
- Customers are suitably engaged to promote legionella control.

### **3. Scope**

This policy applies to any building (temporary or permanent) that is owned, occupied, or managed by believe housing, this includes but is not limited to

- Housing plus units
- Offices
- Community centres
- Commercial premises
- General needs housing stock (including new build properties)

This also, applies to all customers, employees, contractors, agents, tenants or visitors to these buildings, and activities that they undertake that may impact on the water system within the building.

### **4. Roles and responsibilities**

The Approved Code of Practice Legionnaires' disease. The control of legionella bacteria in water systems 2013 (ACoP L8) requires the identification of a "Duty Holder" and a "Responsible Person" for ensuring that the necessary legionella risk assessments and monitoring programmes are undertaken, and that necessary actions are taken where non-conformances are identified.

The Chief Executive is the Duty Holder, and the Compliance Manager is the Responsible Person under the ACoP L8.

Legionella control responsibilities have been further delegated as follows

Roles	Responsibilities
Board	The Board is responsible for ensuring this policy is implemented through the Chief Executive and the Executive Management Team
Chief Executive	<p>Ensure legionella risks are assessed and control measures identified and implemented</p> <p>Ensure that the management of legionella bacteria is appropriately resourced and funded for compliance under the Health and Safety at Work act 1974 and COSHH Regulations 2002.</p>
Executive Directors	<p>Report legionella control performance and updates to Board</p> <p>Ensure legionella control risks are managed in accordance with this policy</p>
The Director of Assets and Compliance	<p>Promote awareness of this legionella policy and its associated procedure, across the company</p> <p>Regularly report legionella control performance and updates to the Chief Executive, Executive Directors, other Directors, and other members of the Leadership team.</p>
The Director of Property Repairs	<p>Ensure that measures are in place to guarantee all work completed on water systems by Property Repairs in-house team or sub-contractors operating on behalf of Property Repairs are completed in line with the requirements of the ACoP L8 and the Water Supply (Water Fittings) Regulations 1999 as well as any additional appropriate legislation and guidance.</p> <p>Ensure that in house teams and contractors working on water systems are appropriately trained to do so at an appropriate standard.</p>

The Director of Neighbourhoods and Customer Experience	Ensure customers are aware of legionella related obligations in their tenancy agreement and are provided with guidance on legionella control at the start of their tenancy
The Director of Development	Ensure all new build properties commissioned by the organisation or purchased are compliant with the relevant legionella control legislation and guidance
Strategic Assets Business Leader	<p>Promote awareness of the legionella policy and associated procedure across the company.</p> <p>Regularly reporting legionella performance and updates to Directors</p> <p>Provide clear legionella control information for all teams across the company.</p> <p>Ensure that measures are in place to guarantee all work completed on water systems by sub-contractors operating on behalf of Assets and Compliance are completed in line with the requirements of the ACoP L8 and the Water Supply (Water Fittings) Regulations 1999, as well as any additional appropriate legislation and guidance.</p> <p>Ensure that those undertaking works on water systems are appropriately trained to do so at the correct standard</p>
The Compliance Manager	<p>Overseeing the management of the legionella, ensuring that believe remains compliant with relevant legislation and the ACoP L8</p> <p>Ensuring that legionella best practice is followed</p> <p>Ensuring that the legionella procedure is regularly reviewed and updated.</p> <p>Ensuring that legionella risk assessments and monitoring programme tasks are completed within set timescales</p> <p>Ensuring that actions generated from legionella risk assessments and monitoring programmes are closed off in a timely and efficient manner.</p>

	<p>Regularly liaising with managers and other employees of believe housing to ensure legionella risk assessment or monitoring actions are brought to their attention, including requests for actions to be closed out.</p> <p>Leading in emergency circumstances including where contamination is found and liaising with other sections of the business to ensure issues are acted upon appropriately</p> <p>Overseeing performance management of legionella contractors.</p> <p>Ensuring relevant legionella data is recorded and monitored.</p> <p>Liaising with managers to ensure employees undertake allocated legionella training</p> <p>Liaising with the Health &amp; Safety Manager, who has overall responsibility for Health &amp; Safety across the organisation.</p>
<p>The Compliance Officer</p>	<p>Develop, maintain, and regularly review the legionella procedure</p> <p>Ensure required legionella risk assessments are completed by a competent person</p> <p>Ensure that risk assessments are regularly reviewed</p> <p>Where required, implement a written scheme of control for properties and regularly review this.</p> <p>Where required, ensure appropriate legionella documentation is provided to each site.</p> <p>Analyse the results of risk assessments and monitoring programme outputs and ensure non compliances are acted on appropriately.</p>

	<p>Arrange for legionella sampling to be undertaken where required</p> <p>Monitor to ensure that local management schemes, where implemented, are applied at each premises, identifying any failings and implementing remedial actions.</p> <p>Ensure emergency procedures are developed and implemented.</p> <p>Identify training requirements relating to legionella control for employees</p> <p>Provide support and ongoing advice regarding legionella control across the organisation</p>
The Health and Safety Manager	<p>Provide competent health and safety advice as stipulated in regulation 7 of the Management of Health and Safety at Work Regulations 1999</p> <p>Liaise with the Compliance Team to ensure this policy and associated procedure is audited effectively by the Health and Safety Team.</p> <p>Investigate accidents and incidents involving legionella with a view to highlighting opportunities for improvement.</p>
Managers	<p>Make teams aware of the legionella management policies and procedure.</p> <p>Where appropriate include legionella management procedures within inductions.</p> <p>Ensure that all works conducted on water systems are in line with the ACoP L8 and Water Supply (Water Fittings) Regulations 1999</p> <p>Immediately report any legionella related issues to both the Compliance and Health and Safety Teams</p>
Employees	<p>Complete any legionella related training allocated</p>



	<p>Report any legionella related issues, or incidences to their line manager immediately</p> <p>Whistleblowing for any legionella issues</p> <p>Where responsible for works on a water system (either directly or via a contractor) ensure that it is completed in line with the ACoP L8 and Water Supply (Water Fittings) Regulations 1999</p>
Customers	<p>To report any faults/defects in and around their home which may affect legionella control</p> <p>To follow the guidance supplied around legionella safety in their home</p> <p>To advise believe housing where they are going to be away from their property for an extended period in accordance with the tenancy agreement.</p>

## 5. Communication with our Customers

believe housing will:

- At least annually promote legionella awareness with our customers.
- act upon any water hygiene concerns reported by our customers.
- keep customers updated on any remedial works taking place in residential buildings.
- liaise with our customers regularly to discuss legionella safety precautions and other compliance matters.

## 6. Monitoring and review

Under the terms of this policy, we will regularly report to the executive management team, audit committee and board. These reports will detail key legionella compliance data as well as legislative non-compliances. This information will be formally reported to audit committee on a quarterly basis.

The policy will be reviewed every two years unless there is a significant legionella incident, important change in circumstances or legislation, which would warrant a review being carried out at an earliest date.

## **7. Links to other policies and procedures**

The document should also be read in conjunction with:

- The Health and Safety Policy Statement
- The legionella procedure Legionella Procurement Tender Specification
- Site Written Schemes
- Premises Logbooks
- CDM Procedure
- Assured (shorthold) Tenancy Agreement