

## Water Safety Policy

<b>Purpose</b>	To define how Eastlight Community Homes will comply with their legal responsibilities in reducing exposure to the legionella bacteria.
<b>Owner</b>	Head of Contract Management & Compliance
<b>Related documents</b>	Health and Safety Policy Legionella procedure
<b>Approved by</b>	Shadow Board
<b>Date approved</b>	29 <sup>th</sup> June 2020
<b>Resident involvement</b>	N/A
<b>Performance Monitoring</b>	Key performance indicator (monthly)
<b>Review frequency</b>	Every 3 years
<b>Last review</b>	May 2020
<b>Next review</b>	May 2023
<b>Version</b>	V1.1
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## 1. POLICY STATEMENT

- 1.1. UK health and safety legislation requires that landlords carry out risk assessments for the Legionella bacteria which cause Legionnaires ' disease and thereafter maintain control measures to minimise the risk.
- 1.2. This policy sets out how Eastlight will seek to reduce the risk of a potential outbreak that could expose residents and staff to the Legionella bacteria.

## 2. SCOPE

- 2.1. There is a duty to assess the risk from exposure to Legionella to ensure the safety of our customers. The risks from hot and cold-water systems in most residential settings are generally considered to be low owing to regular water usage and turnover.
- 2.2. Eastlight's approach to managing the risks associated with Legionella can be defined based on the risk profile of the building:

Risk profile	Definitions	Approach
Low	<ol style="list-style-type: none"><li>1. Housing unit with domestic-type water system</li><li>2. Where cold water is directly from mains supply</li><li>3. Where hot water is fed from instantaneous or low volume heaters</li></ol>	In-house risk assessment
Medium	Void properties	Flushing of system prior to letting the property or draining of systems where property is to remain vacant for a long period.
High	Assets with multiple occupants sharing stored water facilities.	To meet the requirements of the approved code of practice as defined in this policy

- 2.3.1 This policy specifically applies to the following locations considered to be potentially high risk:

- Sheltered Schemes (including communal areas)
- Eastlight Office Premises
- Eastlight's stores facility

## 3. POLICY DETAILS

- 3.1. The roles with responsibility under this policy are:
  - 3.1.1. Duty Holder: Head of Contract Management & Compliance

The Duty Holder is the person in control of premises or systems in connection with work, where there is a risk from systems in the building. They are responsible for ensuring the risk assessments are completed by competent individuals and the threat of exposure to legionella is identified.

3.1.2. Responsible Person: TBC

As directed by the Duty Holder the responsibility of this role, is to make reasonable enquiries to ensure that contractors and staff, are competent, suitably trained and have the necessary equipment to carry out their duties in the written scheme safely and adequately.

3.2. Eastlight will seek to ensure duties set out within the regulations are allocated to a suitable post within the appropriate department. Individuals responsible for discharging Eastlight's duty will have adequate training and will have appropriate authority to deliver a safe Legionella control regime.

3.3 To meet the requirements of the ACOP, we will commission regular and routine monitoring of water outlets, including undertaking repairs as required.

3.4 Annual testing and sampling will be carried out by a contractor who is a member of the Legionella Control Association (LCA) and Eastlight will ensure that appropriate action is taken following recommendations made by the contractor.

3.5 We will complete and record the following inspection regime:

Task	Interval
Risk Assessment	2 years
Thermostatic Mixing Valves	1 year
Tank Inspections / temp checks	6 months
Outlet Temperature Checks	1 month
Flushing	1 week

3.6 Each building site will have a specific written scheme and risk assessment updated every two years. Alongside this a logbook for recording works/ tests undertaken will be on site and/or stored digitally.

**4. STATUTORY AND REGULATORY REQUIREMENTS**

4.1 Although there is no legislation specific to Legionella, there are duties implied upon landlords is set out in the Health and Safety Executive's (HSE's) Approved Code of Practice (ACOP) 'L8: The control of Legionella bacteria in water systems' 2013 (4<sup>th</sup> edition).

4.2 It is incumbent on Eastlight to prove that we followed the relevant provisions of the ACOP or that we complied with the law in some other way. The guidance laid down in the ACOP is not compulsory, however it illustrates good practice and health and safety inspectors seeking to secure compliance with the law may use this as a point of reference.

- 4.3 The Health and Safety at Work Act etc 1974 is the legislation which will be judged to have been disregarded if we do not implement a control strategy in accordance with the ACOP. The Safety Representatives and Safety Committee Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996 also require us to discuss health and safety matters with Trade Union representatives and inform them of any control measures.
- 4.4 Legionella pneumophila is classed as a biological agent by the HSE and is listed as a Class 2 Hazard under the Control of Substances Hazardous to Health (COSHH) Regulations 2002. It is our statutory duty to prevent or control exposure to biological agents.

## **5. EQUALITY AND DIVERSITY**

- 5.1 An equality analysis has been completed for this policy.
- 5.2 A positive impact has been identified on older residents living in sheltered and supported schemes and staff since this policy applies specifically to office buildings and sheltered schemes. This is justified as this is statutory as these buildings are high risk due to the volumes of water stored.

## **6. REVIEW**

- 6.1 The policy holder will review this policy every three years, or as legislation changes.