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# 1. Policy Statement

- **1.1** This Water Safety Policy is to ensure that Eastlight Community Homes (hereafter 'Eastlight') meets its legal, statutory and regulatory requirements under UK legislative and regulatory obligations.
- 1.2 This Policy also serves as a reference document for employees and third parties on the responsibilities of meeting our obligations as a landlord and ensuring the risk of a potential outbreak of Legionnaires disease is adequately managed for the safety of our residents and those visiting our properties or offices.

## 2. Scope

- 2.1 In principle, this Policy applies to all properties and communal areas owned and managed by Eastlight.
- 2.2 This document should be read in conjunction with, but not limited to, the following Eastlight policies:
  - Repairs Policy;
  - Asbestos Policy;
  - Complaints & Resolutions Policy;
  - Compensation Policy;
  - Letting Standards;
  - Empty Homes & Lettings Policy; and
  - Disposal Policy.

## 3. Our Commitments

#### 3.1 Statutory & Regulatory References

- 3.1.1 This Policy is designed to ensure Eastlight meets its obligations under the following legislative and regulatory requirements:
  - HSE's Approved Code of Practice (ACOP) 'L8: The control of Legionella bacteria in water systems' 2013 (4th edition);
  - Management of Health & Safety at Work Regulations 1999;
  - Workplace (Health, Safety & Welfare) Regulations 1992;
  - Health & Safety at Work Act 1974;
  - The Housing Act 2004;
  - The Homes Standard;
  - The Building Regulations 2010;
  - The Control of Substances Hazardous to Health Regulations 2002; and
  - Construction Design & Management Regulations 2015.
- 3.1.2 Any contractor undertaking testing and samples on Eastlight's behalf must be registered through the Legionella Control Association (LCA) or other accredited body.

#### 3.2 Our Roles & Responsibilities

- 3.2.1 Eastlight will assign duties to suitable positions within relevant departments, ensuring individuals responsible for fulfilling these duties receive appropriate training and have the necessary authority to execute a safe water system regime. This will be monitored through our procurement and annual contractor reviews.
- 3.2.2 Duty Holder: Overall responsibility for health and safety at Eastlight sits with the Board & Executive Management Team.
- 3.2.3 Responsible Person: Head of Compliance & Estates.

#### 3.3 Our Commitments

3.3.1 Eastlight will manage the risk of exposure to Legionella disease based on the following risk profile:

Risk Profile	Definitions	Approach
Low	<ol> <li>Individual property with domestic-type water system;</li> <li>Where cold water is directly from mains supply; and</li> <li>Where hot water is fed from instantaneous or low volume heaters.</li> </ol>	1. In-House Risk Assessment
Medium	1. Empty properties.	<ol> <li>Flushing of system prior to letting the property; and/or</li> <li>Draining systems where property is to remain vacant for a long period.</li> </ol>
High	<ol> <li>Properties with multiple occupants sharing stored water facilities;</li> <li>Housing for Older People Schemes; and</li> <li>Eastlight offices.</li> </ol>	<ol> <li>To meet the requirements of the approved code of practice as defined in this Policy.</li> </ol>

3.3.2 To meet the requirements of the Approved Code of Practice (ACOP) for high-risk buildings, we will commission regular and routine monitoring of water outlets as follows:

Task	Interval
Risk Assessment	Biennial
Thermostatic Mixing Valves	Annual
Tank Inspections / Temperature Checks	Biannual
Outlet Temperature Checks	Monthly
Flushing	Weekly

- 3.3.3 Annual testing and sampling will be conducted by an LCA-affiliated contractor. This process will result in recommendations by a competent person and the necessary remedial works will be prioritised accordingly.
- 3.3.4 Each building will have a specific written scheme and risk assessment updated every two years, a logbook for recording works and tests will be undertaken on site and/or stored digitally. These will be made available to customers.

## 4. Think Customer

- **4.1** At Eastlight, we exist to provide the best possible homes and services for our residents.
- **4.2** Our 'Think Customer' approach aims to guide and support colleagues whenever they make decisions that affect our residents, directly or indirectly.
- **4.3** 'Think Customer' ensures our people fully consider how residents will experience and be impacted by the service we provide. Before acting, our people are required to think about:
  - The short and long-term effects of their actions
  - The residents' individual needs and preferences
  - Whether their communication is clear, respectful and appropriate
  - If they can draw on any past insights or experiences to help them when making tough decisions
  - Whether they, themselves, would be happy with the service being provided.
- **4.4** The 'Think Customer' model is designed to complement and work alongside all Eastlight policies and procedures, including this Water Safety Policy.

### Governance

- **5.1** We will provide monthly performance oversight to the Operational Health & Safety Committee, as well as the Executive Management Team.
- **5.2** We will provide quarterly performance oversight to the Board.

# **6.** Equality Impact Assessment

**6.1** An Equality Impact Assessment (EIA) for this Policy was conducted. As a result, actions have been put in place to mitigate any negative impacts.



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