



WATER SAFETY POLICY

Contents

1.	Policy Statement	3
2.	Scope	3
3.	Our Commitments	3
4.	Think Customer	5
5.	Assurance, Oversight & Continuous Improvement	5
6.	Equality Impact Assessment	6

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
 - 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
 - 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 Landlord Compliance & Assurance.

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 style="list-style-type: none"> Individual property with domestic-type water system; Where cold water is directly from mains supply; and Where hot water is fed from instantaneous or low volume heaters. 	<ol style="list-style-type: none"> In-House Risk Assessment
Medium	<ol style="list-style-type: none"> Empty properties. 	<ol style="list-style-type: none"> Flushing of system prior to letting the property; and/or Draining systems where property is to remain vacant for a long period.
High	<ol style="list-style-type: none"> Properties with multiple occupants sharing stored water facilities; Housing for Older People Schemes; and Eastlight offices. 	<ol style="list-style-type: none"> To meet the requirements of the approved code of practice as defined in this Policy.

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 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 must 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.

5. Assurance, Oversight & Continuous Improvement

- 5.1 The organisation maintains a clear “golden thread” of information to ensure landlord compliance and health and safety requirements are managed from operational

delivery through to Board oversight.

- 5.2** The effectiveness of this policy is monitored through defined KPIs, agreed and overseen within the Performance Framework, with Board and the relevant oversight bodies determining the measures needed to support effective scrutiny. This aligns with the Board-approved Governance Framework which sets out roles, responsibilities and oversight arrangements for the areas covered by this policy.
- 5.3** An established assurance framework supports the delivery of risk-based assurance plans agreed annually and mapped across first, second and third lines of defence. These plans are reviewed and approved by the Audit & Risk Committee which retains oversight of their delivery and outcomes.
- 5.4** Findings from audits and reviews are reported through appropriate governance routes, including operational groups, Executive Management Team and the Audit & Risk Committee, ensuring timely visibility and accountability.
- 5.5** The organisation is committed to continuous improvement, using insights from audit findings, performance data, complaints, incidents and wider lessons learned to strengthen controls and processes.
- 5.6** This policy will be reviewed periodically, both at defined intervals and in response to emerging risks or changes in regulatory expectations, to ensure it remains effective, up to date and aligned to organisational objectives.

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.

Eastlight Community Homes

Eastlight House, Charter Way
Braintree
Essex
CM77 8FG

0330 128 0330
www.eastlighthomes.co.uk
customer.services@eastlighthomes.co.uk

 [eastlighthomes](https://www.facebook.com/eastlighthomes)
 [eastlighthomes](https://www.instagram.com/eastlighthomes)
 [@eastlighthomes](https://twitter.com/eastlighthomes)
 [eastlight-community-homes-](https://www.linkedin.com/company/eastlight-community-homes-)