



Water Hygiene Policy

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1. Purpose

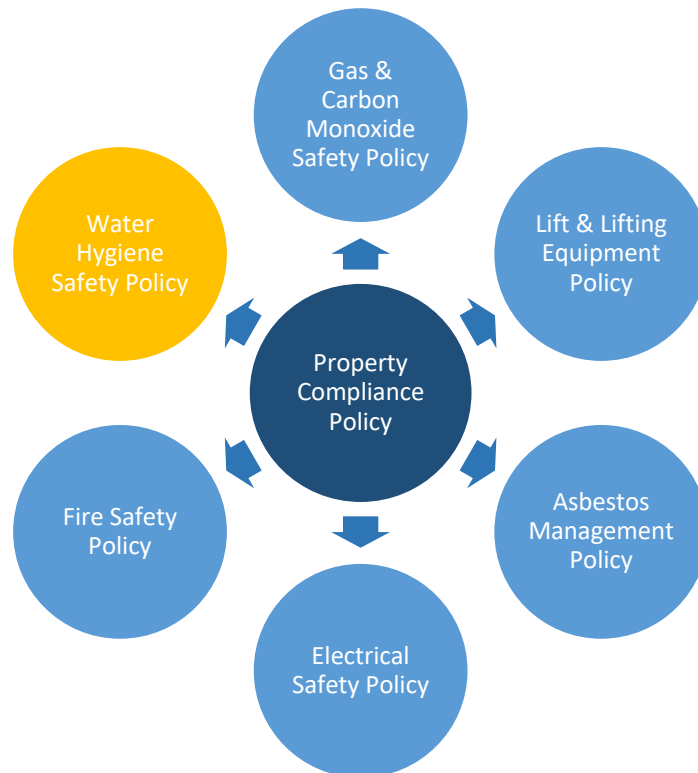
This document details Highstone Housing Association's (HHA) policy on Water Hygiene and provides guidance relating to Water Hygiene Risk Assessments (WRA's).

Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of small droplets of contaminated water containing Legionella. All man-made hot and cold-water systems are likely to provide an environment where Legionella can grow. The Health and Safety Executive provide guidance on what landlords must do to control any risks; this policy has been developed using this guidance. Landlords' duties apply to HHA.

HHA is committed to providing an environment, which ensures the health, safety and wellbeing of tenants, employees, and visitors to its properties. HHA embraces the principles laid down in the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations (1999) and all relevant legislation.

As an RP, HHA understands that it is responsible for ensuring tenants are safe in their homes. This policy is part of a suite of 7 Property Compliance related policies. It has a direct link to the overarching Property Compliance policy, the content of which should be observed when enacting this Water Hygiene policy.

The linkage between HHA's suite of Property Compliance policies is shown below:



The success of this policy depends on the positive working relationships between the HHA teams, external contractors, and care providers, along with the implementation of agreed procedures and meeting of service level agreements.

This policy applies to all offices, properties, communal or shared areas and other buildings that are owned and / or managed by HHA.

It will be adapted to respond to future legislative or regulatory changes and will be reviewed every 2-years.

2. Policy Objectives

The objectives of this policy are to:

- Set out key principles which enable HHA to minimise the risk poor water hygiene practices can bring to anyone living in, working in or visiting properties owned or leased by HHA
- Provide sight of the values, principles and guidelines underpinning HHAs approach to water hygiene safety
- Ensure HHA provides a safe environment for tenants, staff, third parties and any other party visiting or working within any of their properties across their portfolio
- Provide a platform from which to develop working practices and procedures to help ensure risk from water hygiene related dangers is minimised

3. Corporate Responsibilities

As set out in the Property Compliance policy, HHA has a duty of care to ensure that tenants, employees, and visitors can safely use their buildings and facilities. As a Registered Provider (RP), HHA are dutybound to meet the requirements set out in the Regulator of Social Housing's (RSH) framework of Consumer Standards, specifically the Home Standard that requires RPs to meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

Overall and final responsibility for meeting the Home Standard and ensuring Property Compliance is delivered across all relevant properties and buildings is vested in HHA's Board. As such, the Board will formally approve this policy and review periodically.

Board Members have chosen to delegate the operation and facilitation of this policy to the Managing Director. It is the responsibility of HHA's management to ensure that the provisions of the regulations and relevant statutory provisions are observed.

4. Statutory Responsibilities

The law is clear that landlords who rent out property have legal responsibilities to ensure the health and safety of their tenants by keeping the property safe and free from health hazards.

This policy takes into account:

- The Health and Safety at Work Act 1974
- HSE Approved Code of Practice L8: Legionnaires Disease – The Control of Legionella in Water Systems (ACOP L8)

Under the ACOP L8, HHA must identify a “Duty Holder” who will in turn appoint, in writing, a “Responsible Person” to manage Water Hygiene.

For Water Hygiene, the Duty Holder is Highstone Housing Association who will formally appoint the postholder of Repairs and Maintenance Technician to be the Responsible Person.

5. Policy Detail

As a landlord, HHA must:

- Identify and assess sources of risk associated with water systems via completion of a Water Risk Assessment (WRA)
- Manage any risks identified
- Prevent or control identified risks
- Keep and maintain records relating to inspections, risk management and associated works

HHA will ensure any actions or remedial works resulting from WRA’s are completed within an appropriate timescale.

Identify and Assess Sources of Risk

HHA will produce an individual description of the water system for each scheme which will form the basis of a risk assessment.

Although not required by the HSE, HHA will ensure a detailed record of the inspection will include:

- Monitoring results

- A record of inspection and checks undertaken
- Documentation of remedial work carried out
- Any new or existing risks identified requiring additional attention

Manage, Prevent and Control Risks

HHA will ensure assessment of risk at each scheme will be carried out on an annual basis.

Hot water temperature will be tested six-monthly.

HHA require all Support Providers to conduct a weekly test of the hot water using an appropriate draw off point e.g. kitchen sink or a hand washbasin.

Where a property is likely to be void for a long period of time, hot water storage will be managed in accordance with current HSE guidance.

Sharing Information with Tenants and Support Providers

HHA will ensure tenants and/or their support provider will be advised of any control measures put in place that should be maintained, e.g., not to adjust the temperature setting of the calorifier, to regularly clean showerheads etc.

Tenants and/or their support provider must inform HHA if the hot water is not heating properly or there are any other problems with the system so that appropriate action can be taken.

HHA will advise tenants and/or their support provider to regularly (minimum quarterly) clean and disinfect showerheads.

HHA will provide tenants and support providers with an easy read handy guide explaining what they can do to keep their water safe.

Support providers will be given a copy of this policy.

6. Documentation and Record Keeping

HHA will ensure relevant documentation such as WRAs, are fully and accurately completed.

Where a third party completes the WRA, HHA will ensure the WRA is received and actioned in a timely manner.

A copy of all relevant documentation from contractors is required when testing, assessing, servicing or remedial works are completed.

Associated documentation relating to water hygiene safety works shall be kept and clearly referenced to the correct property in the portfolio.

Certification and any other relevant documentation must be completed in accordance with the associated statutory regulations and available for inspection where required.

HHA will only appoint staff or contractors who have the appropriate training and / or experience to undertake work on the water systems across their portfolio.

7. Qualifications and Training

HHA will either employ directly or procure the services of appropriately trained and qualified personnel in carrying out its statutory responsibilities relating to water hygiene safety.

HHA will ensure that only suitably competent persons undertake water safety works in their buildings.

HHA will ensure all staff undertaking roles within this area of Property Compliance will have the appropriate training and support required for their role.

8. Performance and Risk Monitoring

Property Compliance risks are recorded on the risk register, which is reviewed quarterly by the board.

Activity and performance relating to water management is included as a standard agenda item at every Board Meeting. Board members are updated at least quarterly with performance information relating to all areas of property compliance.

The Repairs Manager has day to day oversight of performance and risk monitoring in relation to Water Hygiene Safety.

9. Equality, Diversity & Inclusion

HHA will ensure the requirements of the Equality Act 2010 are met.

Actions under this policy will ensure that all customers will be treated fairly, with dignity and respect regardless of their age, disability, gender or gender reassignment, marital status or civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

Vulnerabilities of HHA tenants and their individual circumstances will be considered when enacting this policy.

10. Document Control

Version Number	Description of Change(s) Applied and Reason	Author of Change	Date approved by board
3.0	<p><i>All Sections</i> – Legionella policy reviewed by DTP following internal audit recommendation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Policy renamed Water Hygiene Safety Policy <input type="checkbox"/> Revised policy incorporated in new suite of Property Compliance policies <input type="checkbox"/> Content re-formatted and re-aligned to mirror headers and format of new Property Compliance policies <p>Draft policy agreed by Highstone.</p>	DTP & HHA	