



Water Safety Policy			
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Version 2			
Version 1	25/10/2019	K McAllister	Introduced as part of Compliance review.

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1.0 Background

- 1.1 Connect Housing manages in the region of 3,000 tenanted properties. Water systems within blocks and to individual dwellings within the housing stock need to be risk assessed, kept safe for use, and if required, be regularly maintained.
- 1.2 This policy explains how Connect Housing's commitments to water safety will be met. It will be supported by a Water Safety Management Plan providing more detailed guidance and procedures.

2.0 Objectives of the Policy

- 2.1 As a Landlord and Employer, Connect Housing are responsible for meeting all their statutory obligations. In addition, as a Landlord and provider of Social Housing, they must meet the Regulatory Standards contained within the Regulator for Social Housing's [Regulatory Framework for Social Housing](#).
- 2.2 A key objective of this Policy is to describe how Connect Housing will meet the required statutory, contractual and regulatory requirements in relation to water safety.
- 2.3 In addition, Connect Housing must undertake a monitoring role to ensure that they are able to demonstrate a validated landlord compliance position, and in doing so, can provide assurance to other 3rd Parties that statutory and regulatory standards are being achieved.
- 2.4 Further objectives of this policy are detailed below:
 - Provide clear lines of responsibilities for the management of water safety.
 - Form part of Connect Housing's wider organisational commitment to health and safety as set out in its Health and Safety Policy.
 - To ensure that all persons involved with the installation, inspection and servicing of water systems and appliances are properly trained and accredited.
 - Provide a commitment to customers who are affected by water safety to communicate and raise awareness regarding the key issues.

- Encourage customers, through the provision of publicity information, to allow access to carry out Legionella Risk Assessments (LRAs) and remedial works which will contribute to their own safety.
 - Put in place quality assurance and performance management arrangements to ensure that we are delivering excellent services to our customers.
 - To provide a timetable for the review of the Water Safety Policy and the associated Management Plan.
 - Provide a service that recognises the diversity of our customers as well as being inclusive and respectful.
 - To ensure Connect Housing provide a safe environment for customers, colleagues and third parties to live and/or work
- 2.5 This document will be stored on Connect Housing Intranet for internal stakeholders and will be available to be viewed by external stakeholders via their web site.

3.0 Compliance with Regulatory Standards and Legal Obligations

3.1 The application of this policy ensures compliance with the regulatory framework for social housing in England, which requires all housing providers to 'meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes'.

3.2 Connect Housing will comply with all current and relevant legislation and specifically as detailed in the following:

- [Legionella Bacteria in Water Systems technical guidance \(HSG 274\) and approved code of practice L8.](#)
- [Control of Substances Hazardous to Health Regulations 2002 \(COSHH\)](#)

3.3 Connect Housing takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985, will also be met.

3.4 It is essential to ensure customers, residents, employees and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our legal responsibilities may result in:

- Prosecution by the HSE under Health and Safety at Work Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- Regulator of Social Housing serious detriment judgement
- Reputational damage

- Loss of confidence by stakeholders in the organisation

4.0 Scope

- 4.1 This policy relates to offices, general needs housing, supported housing, sheltered housing, other rented properties owned and managed by Connect Housing. It also covers communal areas including leaseholders/ shared ownership; other rented housing managed by Connect Housing on behalf of a third party; and remote plant and garages; unless other parties are explicitly specified as having statutory responsibility in a lease or management agreement.
- 4.2 In addition to managing the potential risk arising from legionella, this Policy and the supporting Management Plan will cover risks from scalding and the management of un-adopted water systems.

Property Classification

- 4.3 All Connect Housing's properties will be categorised according to their potential risk to Legionella. High Risk properties will be those that have shared, stored water facilities and particularly when that is coupled with high density occupation (High Rise Flat Blocks for example). Other schemes could be high risk because of the vulnerability of their occupants, sheltered and supported housing schemes. Low risk properties will be the remainder of the housing stock.
- 4.4 Where flats exist that do not require an LRA, because they have no communal areas, evidence which explains their exclusion from the LRA programme will be held.

Record Keeping

- 4.5 The requirement whether to undertake an LRA or not will be held within the core housing management database system ("the database system") .
- 4.6 Details of the recommendations arising from the LRA will be held within a secure database (sharepoint at present)
- 4.7 If a legionella management regime is recommended arising from the LRA, the details of the cyclical maintenance requirements of the regime will be held on a secure database (sharepoint at present), including the frequency of any required actions.
- 4.8 Any remedial works required to the existing water system arising from the LRA will be recorded on QL, including evidence that the required works /system

modifications have been completed on a secure database (sharepoint at present),.

- 4.9 Certificates associated with these visits will be held in an electronic document management system and shall be made available to the customer(s) of the premises.
- 4.10 Connect Housing will carry out regular validation checks to identify whether properties not recorded on QL are required to be added.
- 4.11 A Legionella Risk Assessment (LRA) will be completed at the first time of recording on QL, and when changes occur such changes will include:
- New Property Acquisitions
 - New Build
 - Refurbishment
 - Change of Tenancy or Tenure.

Contractors Competency

- 4.12 Connect Housing has a responsibility to ensure that directly employed water risk assessors, engineers and contractors are appropriately skilled and qualified and are competent to undertake the relevant services. The following controls will operate to ensure competence can be demonstrated:
- Only those Legionella/ water treatment contractors registered with and licensed by the HSE, / Legionella Control Association will be permitted to carry out risk assessments in our properties.
 - All associated water safety related works will be undertaken by trained and competent contractors.

Internal Competency

- 4.13 Connect Housing will ensure that all colleagues undertaking key roles within the delivery and management of this area will have access to training and support applicable to their roles.
- 4.14 Where properties are managed on behalf of external owners and also where Connect properties are managed by 3rd parties, responsibilities for water safety are set out in the terms of the management agreement.

5.0 Monitoring

- 5.1 **Connect Housing Board** are the Landlord and as such are the legal entity responsible for meeting the required standards. It requires regular assurance on the performance of this Policy. Board will also oversee the discharge of the required standards and will receive regular reports on the performance of this policy and are accountable for ensuring its implementation. They will also ensure that appropriate governance arrangements are in place. The Board, through the Audit and Risk Management Committee, will receive regular summary reports on performance as detailed in this policy and be responsible for ensuring any necessary remedial action is undertaken to comply with the policy.
- 5.2 **Audit and Risk Committee** – will receive quarterly KPI reports and commentary on landlord compliance performance. They will draw any concerns they may have arising from such reports to the attention of the Board.
- 5.3 **Connect Housing Chief Executive Officer** will retain the overall responsibility for the monitoring of the consistent implementation of this policy.
- 5.4 **The Director of Home** shall have overall responsibility for Water Safety and for implementing this policy. They shall appoint /nominate Principle Duty Holders for relevant areas of water safety as described within this Policy.
- 5.5 **Director of Finance and Resource and the Senior Manager Business Assurance** shall provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. Implementation of this policy and monitoring of audit feedback shall be the role of the Connect Housing Business Assurance Team who will also oversee the timetable for review of each Landlord Compliance service area.
- 5.6 **Data Governance** – water safety responsibilities will be held within a master database (QL). The completeness of the master database will be regularly validated and reconciled. The reconciliation will identify the addition or removal of any properties which require inclusion or removal from the programme i.e. new build, acquisitions, disposals and sales. The number of Officers who can add or remove properties within the master database will be limited and closely managed. Other databases or spreadsheets used to manage the implementation of this Policy will also be reconciled with the master database on a regular basis.
- 5.7 **Key Performance Indicators** - weekly reports will be generated for designated senior managers direct from the QL databases to ensure compliance can be monitored against minimum agreed Performance Indicators,. The Audit and Risk Committee (3 monthly) and Board (3 monthly) will receive high level KPIs as follows:

- % of High Risk Properties with a current Legionella Risk Assessment.

In addition to the above Performance Indicators weekly Management Performance reports will be generated for designated senior managers, and each Health and Safety Working Group meeting. The detailed MPI's will include

- % of High Risk Properties with a current Legionella Risk Assessment.

- % of properties within a legionella maintenance regime where testing has been completed and valid certification is in place.
 - % of General needs properties where a domestic risk assessment has been undertaken.
 - Total no of outstanding and overdue remedial actions from domestic risk assessments
- 5.8 Commentary will be provided for any properties out of date to include the date they became overdue and number of days overdue. Commentary will also be provided if any properties have outstanding overdue actions.
- 5.9 **Audit and 3rd Party Quality Assurance** - this service area will be included within the cyclical Internal Audit Programme which will review (in particular) adherence to policy, data and record keeping.
- 5.10 In addition, Connect Housing will undertake internal quality assurance to ensure they can robustly demonstrate water safety compliance by inspecting, monitoring and reporting on the technical performance and quality of this business-critical service area.
- 5.11 Water safety is a priority for Connect in order to ensure we provide our customer's with safe homes and this policy will be reviewed on a bi-annual basis. If, as a result of either the finding of the Internal Audit Programme, or other investigation, the service is not performing to the desired level then this will trigger an external strategic review.

6.0 Policy Statement

- 6.1 The Chief Executive, Directors and the Board of Connect acknowledge their moral and legal duty to ensure that all employees, tenants, and any other visitors to premises under Connect Housing's control, are adequately protected from all foreseeable risks that may arise in relation to water safety.
- 6.2 In order to achieve this, Connect Housing will ensure that adequate resources are made available, suitable and sufficient water risk assessments are conducted, and appropriate preventive and protective measures are identified and implemented in all premises under Connect Housing's control.
- 6.3 Connect Housing aims to provide a safe environment in which our tenants (and other relevant persons) are assured that the risk of water safety related injury or disease is minimised. Across our stock we have a variety of tenants and our approach will take into consideration additional needs for vulnerable, older, and mobility impaired residents.
- 6.4 In order to comply with regulatory standards and legal obligations, and to ensure the safety of its customers, staff, contractors and visitors to its properties, Connect Housing will:

Process

- Provide clear lines of responsibility for the management of water safety.
- Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake water safety checks, which shall include legal action when required.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).

Delivery

- Regularly review existing properties and assess risk within new stock through a desk top review which will identify those properties at potential high risk of legionella.
- All properties with communal stored water systems, and where a potential risk has been identified at desk top review, will have a Legionella Risk Assessment (LRA) undertaken.
- All other properties identified through the desk top review of potentially high risk will be subject to an LRA to determine if further management is required.
- The review period for future risk assessments will be established through a risk-based approach within the initial risk assessment carried out by the competent person.
- A water safety management and monitoring programme will be established as required from the LRA findings.
- A sample of domestic properties without LRAs will be assessed within an ongoing annual programme of LRAs, to determine the level of risk and take action to ensure that staff, customers, contractors and visitors are not exposed to legionella bacteria.
- Void properties will be flushed and shower heads disinfected or replaced as part of the void management process or before the customer occupies the property if the property has been empty for longer than 7 days. An LRA will be carried out if appropriate.
- Remove lead pipework that may still exist within the housing stock as Connect Housing is made aware.

7.0 Inclusive Services

- 7.1 Connect Housing puts people at the heart of everything we do, to ensure customers are happy with the service we provide. To do this, we always strive to provide an inclusive service.

- 7.2 To achieve our aims, we have put in place, a wide range of support tools and adaptations to services that can support our diverse customer base, including our vulnerable customers. In addition, we are constantly seeking to improve our service to customers and will continue to introduce new and innovative ways to achieve this.
- 7.3 While we treat all tenants and their homes with courtesy and respect, listening and responding to individual needs, we also recognise that our customers' safety, and that of visitors to their property is paramount. We must ensure that we gain entry to undertake appropriate safety checks, servicing and repairs. We will always try to work with the tenant to resolve any issues and gain entry and any relevant information is passed to our employee or our contractor to enable an appropriate response.
- 7.4 We operate in a community with wide social diversity and are committed to providing equal opportunities and value diversity. We will treat all tenants fairly, with respect and professionalism, regardless of gender, race, age, disability, religion, sexual orientation and marital status. We recognise the importance of working in partnership with our tenants to develop and continually improve our services and raise standards and will work in line with our Neighbourly Places team.
- 7.5 All activities will be subject to compliance with the General Data Protection Regulations 2018.

8.0 Value for Money

- 8.1 It is our aim to continually assess opportunities to enhance our services to customers and actively involve our employees and customers to achieve value for money.
- 8.2 We continually look for the best value for money by sourcing the best materials at the best price. And we're always looking for ways to make our services work more efficiently and effectively.
- 8.3 There is a culture of "do the right things" and "do things right", helping ensure our service delivery is efficient, effective and economical.

Appendix 1 - Glossary of Terms

The following provides a list of words relating to a specific term or abbreviation used in the Policy and Management Plan as detailed below:

Specific Term / Abbreviation Definition

Legionella Risk Assessment (LRA): Risk assessment undertaken by specialist water safety contractor to determine risk and management regime.

Acop L8: Approved code of practice in respect of water safety

WRAS: Water regulations advisory scheme. Database of approved fittings for use on potable water.

Duty Holder: Is accountable for ensuring the implementation of this management plan. The Board has final approval of budget requirements to meet delivery, and of policy amendments.

Responsible Person: Has the duty to ensure compliance with policy, management plan and compliance with the Regulations.

Customer Safety Team: The Connect Housing Team that are responsible for the management of water safety.

QL: This is the Master Database within Connect Housing referred as the Housing Management System (HMS).

Unique Property Reference Number (UPRN): Is a unique reference number applied to every asset (including property and land) within QL and used to ensure every asset can be accurately identified.

Appendix 2 - Current legislation applicable to this policy:

- [Health and Safety at Work Act 1974](#)
- [Landlord and Tenant Act 1985](#)
- [The Health and Safety at Work Act 1974 Section 3 \(2\)](#)
- [Management of Health and Safety at Work Regulations 1999](#)
- [Workplace \(Health Safety & Welfare\) Regulations 1992](#)
- [Control of Substances Hazardous to Health Regulations 2002 \(COSHH\) in relation to Regulations 6 & 7 and Regulation 12:](#)
- [The Control of Legionella Bacteria in Water Systems: Approved Code of Practice and Guidance: HSG 274](#)
- [HSE Guidance - Controlling Legionella in Nursing & Residential Care Homes](#)
- [HSE Guidance - The Control of Legionella including Legionnaires Disease](#)
- [HMSO Publication - Health and Safety at Work etc. Regulations 1999](#)
- [Pressure Systems Safety Regulations 2000](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations \(2013\)](#)
- [The Control of Legionella Bacteria in Water Systems technical guidance \(HSG 274\)](#)
- [Notification of Cooling Towers and Evaporative Condensers Regulations 1992](#)
- [Equality Act 2010](#)
- [The Construction Design and Management Regulations 2015](#)
- [Regulator of Social Housing Regulatory Standard \(The Home Standard\)](#)