

Housing and Safer Communities Policy



Division – Repairs and Investment

Water Safety Policy

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Document Owner – Water Delivery Manager

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I. Policy Objective

- I.1 The Royal Borough of Greenwich (the council) is committed to ensuring that residents homes, residential offices and communal areas are safe and secure places to live and work. The Housing and Safer Communities Directorate (HSC) within the council is responsible for management residential properties that fall within the Housing Revenue Account (HRA) and temporary residential accommodation within the General Fund (GF).
- I.2 The Housing and Homelessness Strategy 2021-2026 sets out the overarching principles and key aims and objectives for the councils housing services to provide safe, secure, and affordable homes. This is divided into five key strands of which this policy sits within: -
- Strand 1 - Ensuring the supply of high-quality homes and
 - Strand 4 – Safe and sustainable homes for all.
- I.3 This policy sets out local arrangements put in place by the HSC and how we intend to meet our legislative and other obligations as a landlord, employer and client providing assurances that the supply of water within HSC's housing stock is safely managed. To ensure that our residents, employees, and contractors are not exposed to any risk that may impact on their health, safety, and wellbeing.
- I.4 This policy does not replace any corporate policies or arrangements in relation to water supply and legionella safety but provides additional assurances where the use and installation of water systems owned and managed by HSC that may cause harm to persons in residential properties.
- I.5 This policy sets out how HSC will ensure that water hygiene in HSC properties is correctly managed and periodically examined in line with current legislation, Approved Code of Practice (ACOP) and British Standards.

2. Context

- 2.1 This policy covers the management and control of legionella bacteria in water systems and aims to mitigate the potential risk of exposure in all residential properties owned or managed by HSC who have the responsibility for the maintenance and repair of these properties.
- 2.2 The policy outlines how HSC intends to take all reasonable precautions to ensure that water systems within HSCs control are safe and to prevent the harmful effects of contaminated water to residents, their visitors, employees, and contractors working at or using HSCs premises
- 2.3 HSC takes the health, safety, and wellbeing of its residents and employees seriously. It is HSCs policy to exceed, where possible, the minimum legislative health and safety standard.
- 2.4 The Management of Health and Safety at Work Act 1999 indicate the Chief Executive has overall responsibility for the council's health and safety obligations. The Chief Executives can appoint competent persons to undertaking or delegate duties under Regulation 7, to assist in meeting their legal obligations.

- 2.5 The Chief Executive has delegated their responsibility to the Director of Housing and Safer Communities and has appointed a Senior Assistant Director for Repairs and Investment directorate to assist in the delivery, implementation, and compliance of the requirements of this policy.
- 2.6 The Senior Assistant Director of Repairs and Investment and the Head of Landlord Risk and Compliance is responsible for the appointment of a competent person, known as the Water Delivery Manager for the effective management of water hygiene and where appropriate to report or escalate issues to the Head of Landlord Risk and Compliance.
- 2.7 The Director of Housing and Safer Communities is responsible to the council's Chief Executive and cabinet members for ensuring the effective delivery, implementation, and compliance of this policy.
- 2.8 HSC's Assurance Framework maps out the governance regime for both officers and cabinet members to ensure HSC meets its regulatory obligations by being visible and accountable for resident safety and the delivery of improvements. The Audit and Risk Management Panel will be responsible for ensuring that the council's cabinet members receive the assurances it requires.
- 2.9 HSC will have relevant procedures in place for the management of domestic and non-domestic dwellings, which provide guidance and a consistent approach for the management of water hygiene safety.
- 2.10 The Water Delivery Manager as the competent persons must be trained to at least City and Guilds Water and Legionella Management or equivalent qualification and have the appropriate experience in water hygiene delivery and management.
- 2.11 All employees who have roles identified in related water hygiene procedures will receive training appropriate to their role, training can vary from awareness through to technician training, including required refresher training.

3. Key Policy Points

- 3.1 HSC will comply with all relevant legislation to meet water hygiene obligations to protect HSC residents, their visitors, employees, and contractors from any risk to health and safety.

3.2 Management of Water Hygiene

HSC will ensure the following general water hygiene precautions are implemented, maintained and will: -

- appoint a qualified competent person to lead and oversee the management of water hygiene and ensure compliance is achieved and maintained.
- appoint and use appropriately qualified registered employees or contractor to undertake water hygiene risk assessments and testing.
- ensure all properties have a risk assessment completed identifying all potential risks associated with water hygiene to be remedied; the Water Management Action Plan outlines details on how risk assessment is planned and frequency.

- maintain a schedule for regular risk assessments and reviews for all properties containing any water systems. Higher risk buildings are any sheltered or supported accommodation or buildings where there are any specific concerns with the hot or cold-water system that a competent person has assessed as a higher risk.
 - higher risk properties will be assessed every 2 years
 - residential buildings with a communal water supply will be assessed every 5 years
 - residential buildings without a communal water supply will be reviewed every 10 years to provide continual assurance
 - more detail can be found in the Water Management Plan.
- have in place robust processes to manage water hygiene in void properties.
- carry out any remedial work identified during a risk assessment or identified when undertaking required maintenance work.
 - High priority actions will be completed immediately or as soon as reasonably practicable, with appropriate controls put in place to manage any urgent issues identified.
 - Lower risk items may be completed as a routine repair or ordered as a planned piece of work depending upon the risk assessed by the Responsible and Competent Person
- complete planned actions identified in each risk assessments Scheme of Control at the frequency identified. This may include: -
 - Temperature checks
 - Flushing of little used outlets
 - Descaling of shower heads
 - Inspections of stored hot and cold water
 - Maintenance of valves, fittings and thermostatic mixer and anti-scalding valves
- have processes and controls in place to ensure that any suspected outbreaks of Legionellosis is properly reported and where necessary to the appropriate authorities.
- investigate and manage all Reporting of Injuries, Diseases and Dangerous Occurrences Regulations notices issued regarding water hygiene and legionella safety.
- remove water tanks, where possible, to remove risks associated with stored water
- consider a strategy for the assessment of risk in domestic premises in line with HSG274 Pt 2. This is set out in the Water Management Plan.

3.3 Contract Management

In line with the council's procurement protocol, where appropriate HSC will: -

- appoint suitably qualified contractors to carry out necessary plumbing or water hygiene related works.
- ensure that supplier accreditation certificates are verified with the appropriate bodies prior to any appointment and re-verified during the contract term to ensure they remain current.
- conduct regular minuted contract management meetings with a standard agenda to review contract goals and monitor performance.
- carry out post inspections to monitor the quality of work.
- carry out appropriate processes to minimise any risk to residents, where appropriate, and ensure actions have been adequately communicated and understood.

- take steps to mitigate any health and safety risks relating to water hygiene through any work activity.

3.4 Failure to Access Properties

If the contractor is unable to gain access to a property to carry out service or any emergency works, HSC will review the reason for this and explore other appropriate and reasonable ways to gain access.

- 3.5 If access to a property is not achieved for a prolonged period, HSC will seek an injunction to gain access to the property to carry out essential work, to ensure our residents are safe. In such cases access will be gained in line with HSCs Access to Properties Procedure.

3.6 Keeping Water Hygiene Records

HSC will keep and maintain: -

- an asset register of all properties that has a written scheme of control of water hygiene in place.
- a record of all risk assessments, testing and any associated remedial works carried out for all properties.
- all water safety records for a minimum period of 5 years.
- records on the qualification of all contractors, surveyor, risk assessors and engineers undertaking water hygiene works.
- a record of employees attending what hygiene/ legionella safety training.

3.7 Resident Responsibilities

Residents are to proactively work in partnership with HSC to help keep them safe from the risk raising from water hygiene by: -

- allowing access for our contractors or in house team to complete maintenance visits and any remedial works.
- reporting any concerns to HSC at the earliest opportunity.

3.8 Awareness and Communication of Water Safety

HSC will protect residents, employees, and contractors by ensuring: -

- relevant employees are briefed and appropriately trained on key water hygiene compliance regulations.
- arrangements are in place with contractors so that residents and employees are aware of any risk assessment or maintenance work to water systems and that any disruption to the supply of water is kept to a minimum.
- engage openly and proactively with regulators and all other stakeholders.
- ensure that other contract procurement as well as DLO activities take account of water hygiene management requirements.
- residents are informed of any disruption to their water supply and when water supply is likely to be reinstated, while works is undertaken.
- the promotion of water safety is communicated to residents in a format that is accessible and can be understood by residents.

4. Legislation

- 4.1 HSC will comply with all current and relevant statutory obligations where applicable. We will also adhere to published Approved Codes of Practice (ACoPs) and guidance where applicable.
- 4.2 The principal legislation for this policy is: -
- Health and Safety at Work Act 1974
 - Secure Tenants of Local Authorities (Right to Repair) Regulation 1994
 - Landlord and Tenant Act 1985
 - Environmental Protection Act 1990
 - Management of Health and Safety at Work Regulations 1999
 - L8: Legionnaires' disease. The control of legionella bacteria in water systems
 - HSG 274 Parts 1, 2 and 3: Legionnaires Disease Technical Guidance
 - Water Supply (Water Fittings) Regulations 1999
 - Control of Substances Hazardous to Health Regulations 2002
 - Housing Act 2004 (Housing Health and Safety Rating System)
 - The Charter for Social Housing Residents 2020
 - Building Safety Act 2022
 - Social Housing Regulation Act 2023
- 4.3 This list is not exhaustive but contains the main legal duties regarding water safety.
- 4.4 HSC will also comply with all relevant approved code of practice, guidance, and British Standards that underpin legislation.
- 4.5 This policy should be read in conjunction with relevant legislation as well as HSCs Water Management Plan (in draft) and in line with current established procedures.

5. Implementation and Performance Monitoring

- 5.1 The implementation of this policy will be carried out through employee training, and briefings. A copy of this policy will be made available on the intranet for review.
- 5.2 Performance will be monitored and challenged through agreed key performance indicators and will be reviewed at the following scheduled meetings, subject to review: -
- Directorates Management Team (DMT)
 - Landlord Compliance Group
 - Compliance Safety Panel
 - Compliance Operational Group
 - Water Safety Action Group
- 5.3 HSC will seek independent assurances through internal and external audit processes and will publish results.
- 5.4 This policy will be reviewed annually at the Water Safety Action Group, following a serious incident of legionella or any change in legislation prior to a scheduled review.

- 5.5 If during the review no amendments are required to the policy, it will be reported to the Compliance Safety Panel and Landlords Compliance Group meetings and minuted for audit purposes.