

water management policy

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1. Policy statement

believe housing is committed to providing a safe environment for its colleagues, customers, visitors, and contractors. Part of this safety responsibility is to manage the risks associated with legionella bacteria, so far as is reasonably practicable.

We recognise our legal obligations in relation to legionella and will operate in accordance with all current legislation and Approved Codes of Practice. We will work closely with our customers to also provide advice and guidance on how to protect themselves and visitors from legionella bacteria and will act upon any concerns they report.

2. Obligations and policy aims

Legionella is a potential hazard to all believe housing buildings containing water systems. The aim of this policy is to provide a robust legionella control strategy to reduce the risk as low as is reasonably possible.

We understand our legislative and moral obligations and will ensure that the risk of legionella bacteria is managed in accordance with current legislation and guidance. This includes but is not limited to:

- Health and Safety at Work etc Act 1974
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Management of Health and Safety at Work Regulations 1999
- Water Supply (Water Fittings) Regulations 1999
- Approved Code of Practice Legionnaires disease: the control of legionella bacteria in water systems 2013
- HSG274 Part 2: The control of legionella bacteria in hot and cold-water systems 2024
- HSG 274 Part 3: The control of legionella bacteria in other risk systems 2024
- BS8580-1: 2019 Water quality, Risk assessments for Legionella control
- BS8680: 2020 Water quality, Water safety plans
- BS7592:2022 Sampling for Legionella bacteria in water systems
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.

We must also ensure we comply with the Regulator for Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Approved Code of Practice Legionnaires disease: the control of legionella bacteria in water systems (2013) states that organisations such as believe housing have a legal obligation to manage the risks from legionella bacteria. We are required to:

- identify and assess sources of risk, including checking whether conditions will encourage bacteria to multiply
- where appropriate, prepare a written scheme for preventing and controlling the risk.
- implement, manage and monitor the precautions introduced
- keep records of the precautions
- appoint a Competent Person with sufficient authority and knowledge of the installations to help take the measures needed to comply with the law.

We acknowledge and accept our responsibilities under the Approved Code of Practice (L8). To ensure we can fulfil our responsibilities in relation to the management of legionella we will:

- clearly define the responsibilities of believe housing to our customers, colleagues, visitors, and contractors
- provide suitable and sufficient resource to manage legionella effectively
- implement suitable and sufficient governance arrangements to manage the risks associated with legionella
- allocate responsibilities and duties for legionella management
- employ competent persons to manage legionella programmes
- provide suitable and sufficient legionella awareness training
- arrange for legionella risk assessments to be completed within the required timescales
- where required, develop and implement a written scheme, of control
- complete monitoring programmes from the written scheme of control within suitable timeframes
- suitably manage, complete and evidence actions raised from risk assessments and monitoring programmes
- implement effective legionella management record keeping
- develop a legionella sampling programme and implement this where necessary
- develop and implement emergency plans
- operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts are in place, conducting client-led performance meetings and ensuring the contractors employee and public liability insurances are up to date on an annual basis
- engage with customers, and suppliers to inform and promote legionella awareness

- use the legal remedies available within the terms of the tenancy or lease agreement should any customer, leaseholder or shared owner refuse access to conduct essential legionella-related inspection and remediation works
- conduct and maintain a risk and control self-assessment for legionella management and operations setting out our key risks from legionella and appropriate mitigations.

3. Scope

This water management policy applies to all believe housing colleagues, customers and contractors who may work in, occupy, or use the premises under the control of believe housing. This includes,

- Housing Plus units
- Offices
- Community hubs
- Commercial premises
- General needs homes (including new build properties)

4. Roles and responsibilities

The Approved Code of Practice Legionnaires' disease. The control of legionella bacteria in water systems 2013 (ACoP L8) requires the identification of a 'Duty Holder' and a 'Responsible Person' to oversee the management of risk in relation to legionella.

The Chief Executive is the Duty Holder, and, through the Director of Assets and Compliance, the Compliance Manager is the Responsible Person.

Legionella control is a collective organisational responsibility and therefore this policies implementation is delegated throughout the business as follows:

Audit Committee and Board will:

- challenge internal legionella safety control procedures and performance.

The **Chief Executive** will:

- scrutinise the implementation of the water management policy and its related procedure
- provide sufficient resource for the implementation of a robust and compliant system of legionella management, in line with relevant legislation.

The **Assets and Compliance Directorate** will:

- promote awareness of the requirements of this water management policy and associated procedure across the organisation, and oversee the management of legionella control programmes, ensuring that believe remains compliant with relevant legislation and the ACoP L8
- report legionella programme performance and updates on an agreed consistent basis
- develop, maintain, and regularly review the water management policy and procedure
- implement clear and robust communication with customers in relation to legionella control
- procure and oversee the performance management of competent contractors to undertake legionella risk assessment and monitoring tasks
- complete legionella risk assessments within the required timescales
- where required, develop written schemes of control for properties and implement suitable monitoring programmes
- close all actions raised in risk assessments or monitoring visits, in a timely and efficient manner
- arrange for legionella sampling to be undertaken where required
- lead in emergency situations, including where contamination is found, and liaise with other sections of the business to ensure emergencies are acted upon appropriately
- record, update and monitor relevant legionella data, and hold this in an appropriate location
- develop a suitable legionella awareness training programme for the organisation
- assess the suitability of new technologies introduced into our properties, ensuring that these do not compromise water safety.

The **Property Repairs Directorate** will:

- implement this policy within the Property Repairs and ensure in-house teams and contractors working on water systems are appropriately trained and complete any work in line with current regulations and guidance.

The **Neighbourhoods and Customer Experience Directorate** will:

- provide all customers with information on legionella control at the beginning of their tenancy and make them aware of their legionella related obligations under the tenancy agreement

- support in cases of no access in relation to the inspection and remediation requirements of this policy.

The **Development Directorate** will:

- ensure all new-build properties commissioned by the organisation or purchased under Section 106 are compliant to the relevant water safety legislation for residential properties
- provide resource and budget to ensure that new homes are compliant before being occupied.

The **Corporate Strategy and Assurance Directorate** will:

- provide competent health and safety advice as stipulated in Regulation 7 of the Management of Health and Safety at Work Regulations 1999
- investigate accidents and incidents involving legionella with a view to highlighting opportunities for improvement.

The **Transformation and Culture Directorate** will:

- make legionella awareness training available for relevant colleagues and reissue this, where required, on a cyclical basis.

All **believe housing colleagues** will.

- be aware of the water management policy and procedure and their duties under this
- immediately report any legionella related issues to both the Compliance and Health and Safety Teams
- complete any legionella related training allocated within the required timeframes.

All **customers** will:

- not put themselves or anyone else at risk in relation to legionella safety
- follow the guidance supplied by believe housing in relation to legionella control
- report any faults/defects in and around their home which may affect legionella control
- advise believe housing when they are going to be away for an extended period in accordance with the tenancy agreement.

5. Programme and remedial works

Legionella risk assessments will be conducted using a risk-based approach. These will be carried out across believe housing properties at the following frequencies:

Property type	Frequency
Non-domestic properties and Housing Plus units	Every two years
Domestic properties with water storage (for example, solid fuel, back boilers, air source)	Every five years
Domestic properties with no water storage (for example, combi boiler fed systems)	One-off assessments

It is recognised by the Health and Safety Executive that it is impractical for a landlord to risk assess every individual residential property where there is a significant number in their control. Therefore, believe housing's approach is to initially assess properties with no water storage on the basis of similar size, age and water supply. Following the completion of this the entire portfolio will eventually be assessed on a rolling programme of work.

Although water systems require a risk assessment, not all systems will require a written scheme of control. Following the risk assessment, if the potential risk of legionella growth is identified, a written scheme of control will be developed and implemented at the property. Typically, in a non-domestic property or Housing Plus units (HPU) this will include the following; however, these tasks and frequencies may be adjusted in line with the risk on a site-specific basis:

Frequency	Tasks
Weekly	Flushing little used outlets
Monthly	Temperature monitoring
Quarterly	Shower head and hose cleans, calorifier blow downs (HPUs only) and expansion vessel flushing (HPUs only)
Six-monthly	Thermostatic mixing valve failsafe testing, cold water storage tank inspection and expansion vessel flushing
Annually	Thermostatic mixing valve servicing and calorifier blowdowns

Where a written scheme is required in a domestic property, tasks such as temperature monitoring, cold-water storage tanks and water heater inspections will be completed on an annual basis.

Any company undertaking the risk assessment or monitoring programmes will be Legionella Control Association registered for all elements of the work they are undertaking.

Where a risk assessment or monitoring visit identifies further remedial works are required these will be carried out within the following timescales:

Risk rating	Timescale
Urgent	Mitigation will be put in place within 24 hours
High	One month
Medium	Six months
Low	One year

Sampling for legionella bacteria will be undertaken under the following circumstances:

- Samples will be taken monthly in the Housing Plus units. This is due to the increased size and complexity of the building, in addition to the vulnerability of the customers.
- Where the control measures, such as temperature, for the property are not being consistently achieved.
- Where chemical dosing systems are introduced to a system and temperatures are decreased.

All water samples will be sent to an independent laboratory, which is UKAS accredited for the testing they are undertaking and takes part in an external proficiency scheme (such as those run by Public Health England) for the enumeration of legionella bacteria.

6. Data and records

We maintain a core asset register of all properties we own and manage in our PIMSS asset management system. The data from this is used to identify properties that require risk assessment on a two- and five-year basis. We will set out which properties require ongoing monitoring as prescribed by the written scheme.

We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from the legionella programmes and the programmes remain up to date.

All cyclical legionella programmes are managed through appropriate software. When received all legionella risk assessments and monitoring records are checked for accuracy and then saved on the organisations document management system. All records in relation to the legionella control are retained for a minimum of five years.

7. Competent persons

believe housing's Compliance Manager and Compliance Officer (Water) will hold a City and Guilds (or equivalent) qualification in the management of hot and cold water systems.

Only competent contractors will be used to complete legionella related activities, and they must be Legionella Control Association registered for all elements of work they are contracted to complete.

All individuals who complete legionella risk assessments on behalf of believe housing must have a qualification in legionella risk assessing, through City and Guilds, BOHS or an equivalent examination body.

We will check that our contractors hold the relevant qualifications and accreditations when we procure them and, thereafter, on an annual basis, and relevant certification will be saved accordingly.

8. Our commitments to our customers

We consider good communication essential in effective legionella management, therefore we will develop a customer engagement plan. This will support customers in their understanding of legionella and advise them how they can keep themselves and others safe and encourage them to report any concerns.

We also aim to engage with vulnerable and hard to reach customers. We will share information clearly and transparently and will ensure that information is available through regular publications and information on our website.

believe housing will:

- implement a programme of legionella risk assessments across our homes and buildings as outlined in section six
- develop a written scheme and implement a suitable and sufficient legionella monitoring programme, where the risk assessment shows it is required
- act upon any faults or issues highlighted by the inspection programme, in a timely manner
- conduct legionella sampling where required
- annually, publish data relating to the tenant satisfaction measure for legionella risk assessment on believe housing's website
- regularly promote legionella awareness with our customers
- act upon any water safety concerns reported by our customers
- keep customers updated on any remedial works taking place in residential buildings

- consider any suggestions made by our customers that could improve legionella management
- liaise with our customers regularly to discuss legionella safety precautions and other compliance matters.

9. Performance reporting

We will report key performance indicator (KPI) measures for legionella risk assessments that follow the requirements set out in the Tenant Satisfaction Measures (TSMs), which came into force on 1 April 2023 and must be reported to the Regulator for Social Housing on an annual basis.

We will also report to the following in relation to legionella management:

Report recipient	Frequency
Regulator of Social Housing	Annually
Audit Committee	Quarterly
Senior Management Team	Fortnightly

The content of these report differs however overall, the following will be reported annually:

Data

- Number of properties on the legionella risk assessment and monitoring programmes
- Properties with a valid in date legionella risk assessment
- Properties without a valid in date legionella risk assessment
- Status of the monitoring programme tasks
- Information on no access.

Narrative

- Current position
- Remedial works highlighted in legionella risk assessments and their progression (including narrative around anything overdue)
- Sampling results.

10. Quality assurance

We will internally review 100% of legionella risk assessment reports and monitoring outputs.

We will visit site with both the legionella risk assessment and monitoring contractors every six months to conduct an audit of their work.

We will carry out an independent audit of legionella management at least every three years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues for correction.

11. Policy review

The policy will be reviewed every two years unless there is:

- a significant legionella incident
- an important change in circumstances or legislation, which would warrant a review being carried out at an earlier date
- any significant issues raised regarding the policy by an independent organisation undertaking audit or review.

12. Significant non-compliance and escalation

Our definition of a significant non-compliance is any incident that has the potential to result in a major breach in legislation or regulatory standard, or that causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.

All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident or of a colleague becoming aware.

Any non-compliance issues at an operational level will be formally reported to the Compliance Manager and, where necessary, the Health and Safety Manager in the first instance, who will agree an appropriate course of corrective action.

In cases of serious non-compliance, the Senior Management Team and Board would consider whether it is appropriate to disclose the issue to the Regulator for Social Housing as required by the regulatory framework, or any other organisations such as the Health and Safety Executive.

We will ensure that there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to asbestos safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

13. Links to other policies and procedures

The document should also be read in conjunction with:

- The Health and Safety Policy Statement
- Site Written Schemes
- CDM Procedure
- Assured (shorthold) Tenancy Agreement
- Voids Repairs Procedure
- Repairs and Maintenance Procedure
- Customer Home Improvements Policy
- Tenancy Policy
- Tenancy Management Toolkit
- Equality, Diversity and Inclusion.