Water Hygiene Policy

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Gary Clarkson & Lizzie Williams	**Original author**	February 2017
Lizzie Williams	Periodic review. Updated 5.2 to reflect staff changes.	April 2019
Kevin Wright	Periodic review. Updated to reflect staff changes and best practice.	February 2020
Valesca Wilton-Smith and Charles Pugh	Periodic review.	January 2022
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Approval process for current version

Presented to	Date	Outcome
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1. Introduction

1.1. Poplar HARCA has a responsibility to minimise the risks associated with legionella and other bacteria within water systems.

1.2. Legionella bacteria are common and naturally occur in many environmental water sources.

1.3. Problems can occur when numbers of bacteria grow and colonise a water source. This is most likely to happen when water temperature is within the range of 20°c to 45°c and nutrients such as algae, sediment etc. are present.

1.4. When colonisation of legionella bacteria occurs in a water source that can produce a water mist, spray or droplets, the bacteria can become airborne and there is therefore a risk of inhalation. In rare circumstances this can lead to Legionnaire's and other diseases.

1.5. Poplar HARCA is committed to safeguarding the health, safety and wellbeing of everybody living, working or visiting our buildings.

1.6. This policy sets out Poplar HARCA's water management requirements and standards for all assets, including housing stock, offices, community centres, other buildings and water features for which Poplar HARCA has responsibility (as defined by the lease).

2. Regulatory standards, legislation and codes of practice

2.1. Poplar HARCA's water hygiene management arrangements must comply with:

Regulator	• Regulatory framework and consumer standards (Home Standard) set out by the Regulator for Social Housing
Legislation	• Health and Safety at Work Act 1974 • The Management of Health & Safety at Work Regulations 1999 • Control of Substances Hazardous to Health (COSHH) Regulations 2002
Codes of practice	• ACoP L8 - 'Legionnaires' disease: The control of legionella bacteria in water systems' (4th edition 2013) • HSG274 - Legionnaires' disease: Technical guidance Part 1: The control of legionella bacteria in evaporative cooling systems (2013) • HSG274 - Legionnaires' disease: Technical guidance Part 2: The control of legionella bacteria in hot and cold water systems (2014) • HSG274 - Legionnaires' disease: Technical guidance Part 3: The control of legionella bacteria in other risk systems (2013) • INDG458 - Legionnaires' disease: A guide for dutyholders Leaflet (HSE Books 2012) • BS 8580-1:2019 Water quality – Risk Assessments for legionella control – Code of Practice • BS 8558:2015 Guide to the design, testing and maintenance of services supplying water for domestic use within buildings and their curtilages

This policy also operates in the context of:	• The Workplace (Health Safety & Welfare) Regulations 1992 • Homes (Fitness for Human Habitation) Act 2018 • Housing Act 2004 • Landlord and Tenant Act 1985 • Construction, Design and Management Regulations 2015 • RIDDOR 2013

2.2. **Sanctions**

Failure to discharge these responsibilities in full could result in prosecution, unlimited fines, and/ or a serious detriment judgement from the Regulator for Social Housing.

3. Requirements

3.1. Poplar HARCA has the responsibility to:

- take suitable precautions to prevent or control the risk of exposure to legionella
- carry out a risk assessment on all hot and cold water systems, and any other systems that can produce water droplets
- identify and assess sources of risk
- prepare a site specific scheme of control *(to include risk assessment, action plan, site maintenance records, results of all monitoring, inspections and tests)*
- implement, manage and monitor control measures
- record a list of precautions
- keep accurate records for all the requirements listed above and review them regularly
- appoint a competent 'Duty Holder' responsible for control of legionella and water hygiene safety.

4. Delivery

4.1. Water hygiene programmes are delivered through a competent external contractor.

4.2. Contracts are regularly reviewed and retendered in line with the organisation's policies.

4.3. In order to meet requirements and ensure safety Poplar HARCA will:

- ensure that accurate records are kept for all properties
- appoint a Duty Holder who is responsible for the control of legionella and water hygiene safety
- ensure that all properties are risk assessed. The risk assessment will include:
  - management responsibilities, including the name of the risk assessor
  - a description of the system, potential risk sources and current control measures
  - monitoring, inspection and maintenance procedures
  - records of the monitoring results, inspection and checks carried out and a review date
- risks that are assessed to be, insignificant and are being properly managed to comply with the law, no further action is required

- ensure that a Written Scheme of Control is developed for all properties requiring controls to adequately manage the risk of legionella exposure. This 'written scheme' will identify:
  - the system a written schematic
  - who is responsible for the assessment and implementation
  - safe and correct operation of your system
  - control measures required
- ensure that robust processes are in place to ensure that all remedial works identified through risk assessments and subsequent control activities are completed within a reasonable timescale
- ensure that relevant staff are sufficiently trained to understand the risk posed by legionella and the importance of water hygiene management

4.4. Temperature control as its primary control measure, maintaining water temperatures and throughput, configuration and cleanliness so as to avoid conditions under which Legionella can proliferate. All water systems will be maintained to ensure that cold water temperatures below 20°C and hot temperatures above 50°C are supplied to outlets. All stored hot water will be maintained at temperatures of 60°C or above.

4.5. Where there is a risk of scalding to service users, especially the young, infirm or elderly then provision will be made for the installation of thermostatically controlled devices to limit the temperature of the water to which they are exposed. Where such devices are installed they will be maintained on a frequency defined by the risk assessment taking account of any manufacturer's instructions.

4.6. Where temperature control cannot be maintained, an engineering solution will be sought. If this is not viable then alternative methods of control such as dosing with chlorine dioxide may be a suitable alternative.

4.7. Steps will also be taken to:

- ensure that, where possible, the release of water spray is properly controlled
- ensure that water cannot stagnate anywhere in the system by regular movement of water and by keeping pipe lengths as short as possible
- remove redundant pipework and deadlegs
- avoid the use of materials that harbour bacteria and other microorganisms or provide nutrients for microbial growth
- keep the system and water in it clean

4.8. Where required, access to tenant's homes is managed in accordance with Poplar HARCA's Access Procedure

4.9. All works required due to a risk to health will be completed within 24 hours.

4.10. In the event of an outbreak of legionella within a Poplar HARCA property, the control measures detailed in the Suspected Legionella Outbreak Procedure will be instigated within 24 hours.

4.11. Legionnaires' disease is notifiable under public health legislation. Poplar HARCA will seek the assistance of the Health and Safety Executive should an outbreak of Legionnaires disease occur.

5. Follow on works

5.1. Poplar HARCA will ensure that there is a robust process in place for managing any follow on works arising from the water hygiene management programmes.

5.2. Emergency procedures are in place to ensure that occurrences such as failing temperature control, shutdown of premises, and legionella bacteria being detected in water systems are managed effectively.

6. Record keeping

6.1. Poplar HARCA maintains an asset register of all properties that have a written scheme of control for water hygiene in place.

6.2. Appropriate records of all risk assessments, tests, inspections and works to water systems must be kept for a minimum period of five years. This is to include records of all activities described in the Written Scheme of Precautions for each site.

6.3. Orders for water hygiene programmes and follow on works will be issued to contractors via the Orchard Housing Management System (core system).

6.4. Contractor records are created electronically and are available to staff via the contractor's secure web portal.

7. Performance monitoring and reporting

7.1. There is a robust procedure in place for monitoring compliance and validating asset lists.

7.2. Key performance indicator (KPI) measures are in place, regularly reviewed and reported to senior management, other relevant staff, resident committees and the Board.

8. Roles and responsibilities

Poplar Board	Overall governance responsibility for ensuring that the organisation is compliant with regulatory standards, legislation and codes of practice.
Chief Executive	Acts as the organisation's **Duty Holder** for water hygiene management. Strategic responsibility for the management of water hygiene and for ensuring that compliance is achieved and maintained. The Duty Holder has a responsibility to support this policy by ensuring the allocation of resources including an adequate budget, suitable and sufficient equipment, personnel, time and training.
Director of Technical Resources	Acts as the organisation's **Responsible Person** for water hygiene management. The Responsible Person has the authority to put into effect such measures as are required to control the risk of Legionellosis, both as a matter of routine and in the event of a crisis. The Responsible Person has a duty to ensure that ACoP L8 and all relevant legislation associated with the management and control of Legionellosis are adhered to.

	The Responsible Person is required to ensure that those persons specifically appointed to implement the control measures are suitably informed, instructed and trained to carry out the prescribed task on their behalf and to arrange the procurement of competent help, as required, including ensuring that the organisations and individuals deployed are competent and appropriately trained and experienced.
Assistant Director of Asset Management	Deputise for the Responsible Person in their absence, fulfilling all the duties as described above
Head of Asset Compliance	Deputise for the Responsible Person in their absence, fulfilling all the duties as described above and oversee day-to-day delivery of risk assessment and testing programmes.
Compliance Manager (Mechanical)	Acts as the organisation's **competent person** for water hygiene management. Responsible for day-to-day management and delivery of programmes, including ensuring that the scheme of precautions to control the risk of Legionellosis is implemented fully by the competent contractor. The competent person should hold, as a minimum, the City and Guilds Frontline Skills Framework Utilities 5831 scheme unit 400 Legionella: Role of the Responsible Person.
Asset Manager (Mechanical)	Responsible for managing the delivery of capital works and major repairs to water tanks, plumbing systems and other installations including quality control and contract management.
Competent contractor	Responsible for the operational delivery of water hygiene monitoring and remedial works. Poplar HARCA will employ a suitably qualified specialist contractor to undertake a range of water hygiene functions. This will include, but is not limited to, periodic water quality sampling and testing, temperature monitoring, servicing of thermostatic mixing valves and preparation of risk assessments, schematic drawings of water systems and Written Schemes of Precautions. They may also provide technical advice and training. The competent contractor will have membership to the Legionella Control Association (LCA), a quality management system such as ISO9001, and membership of professional bodies relevant to their responsibilities.

9. Policy review

9.1. Policies are reviewed every 2 years or sooner if they no longer reflect best practice.

10. Appendix 1: Impact assessment

How does the policy/procedure/strategy contribute to Poplar HARCA's aims?	**The policy is a statement of our intention to meet all statutory obligations associated with water hygiene.**
Which group(s) of people benefit from the policy/procedure/strategy? If any group could be disadvantaged, what is the mitigation or justification?	All groups benefit from this policy in terms of health & Safety. It is also beneficial for residents, staff and the Board to be aware of Poplar HARCA's statutory obligations.
How have residents been involved in developing the policy/procedure/strategy? If they have not been involved, why not?	The policy is a statement of our intention to meet all statutory obligations associated with water hygiene. There is no scope for resident involvement other than Board approval.
How will the policy/procedure/strategy be monitored and measured? (e.g. performance indicators?)	A requirement to monitor has been included in this policy document. Means of monitoring have been built into the Association's procedures.
If any, what are the Value for Money implications?	The policy is a statement of our intention to meet all statutory obligations. Value for Money is not a consideration for this policy.
Will personal data be collected, stored, used or shared? If yes, a privacy impact assessment must be carried out.	Yes, personal information may be shared with contractors (e.g. name, address, contact details) in order to allow them to carry out required works.