

# Water Safety Policy



**Our Assets**

Warrington Housing Association

## INTRODUCTION

Warrington Housing Association (WHA) is a community based not-for-profit organisation located in the borough of Warrington.

This policy sets out specific guidance to ensure compliance with water hygiene legislation and control the risk by introducing measures which reduce and/or control the risk of legionella growth and to identify, manage and/or mitigate risks associated with hot and cold-water systems or any other system that may cause exposure to legionella bacteria.

## SCOPE OF POLICY

Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk increases with age, but some people are at higher risk including; people over 45 years of age, smokers and heavy drinkers, people suffering from chronic respiratory or kidney disease, diabetes, lung and heart disease, anyone with an impaired immune system.

There is reasonably foreseeable risk of exposure to Legionella bacteria exists in the following situations; water systems incorporating a cooling tower or evaporative condenser; hot and cold water systems; other plant and systems containing water which are likely to exceed 20C and which may release a cloud of droplets and/or droplet nuclei (residue that remains when water has evaporated) during operation or when being maintained.

WHA must establish a policy to meet the requirements of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 (the Management Regulations) and the Control of Substances Hazardous to Health Regulations 2002. (COSHH) and will adhere to the Approved Code of Practice L8 advice.

WHA will report compliance with water hygiene legislation to the Senior Management Team (SMT) and Board.

This policy is relevant to all WHA employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.

## OBLIGATIONS

The Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH), the Management of Health and Safety at Work Regulations 1999 and the Health and Safety at Work Act 1974 place a duty, as an employer or person in control

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of a premises, to take suitable precautions to prevent or control the risk of exposure to legionella.

To carry out a risk assessment for all hot and cold water systems, cooling plant and any other systems that can produce water droplets to establish any potential risks and implement measures to either eliminate or control identified risks.

WHA as the Duty Holder responsible for the control of legionella and water hygiene safety will appoint a competent person to carry out legionella risk assessments, production of a written scheme and implementation of that scheme to prevent or control the risks.

#### STATEMENT OF INTENT

WHA acknowledges and accepts its responsibilities with regard to water hygiene safety and preventing exposure to legionella

WHA will hold accurate records against each property it owns or manages, identifying when water risk assessments and safety checks were last inspected, records will also identify properties where maintenance remedial works have been carried out to eliminate or reduce the risk of exposure to legionella. These will be stored on WHA's shared drive/ housing system.

At present the properties that are included in this policy include sheltered schemes, supported housing properties and offices/ community centre.

WHA as the 'Duty Holder' responsible for control of legionella and water hygiene safety will ensure that only suitably competent consultants and contractors are registered members of the Legionella Control Association (LCA) or equivalent are to be procured and appointed to undertake risk assessments, prepare written schemes of control and undertake works in respect of water hygiene and legionella control. WHA will have access to the consultant's web-based portal, which also contain all records.

WHA will ensure that properties are risk assessed by a competent person for potential to cause exposure to legionella. The risk assessment should include:

- Name of the competent person carrying out the risk assessment
- A description of the system, any potential risk source and any controls currently in place to control the risk
- Monitoring, inspection and maintenance procedures
- Records of the monitoring results, inspection and checks carried out and review date.

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Where the risks are assessed to be insignificant and are being properly managed to comply with the law, no further action is required. WHA will periodically review these risk assessments every 2 years in case anything changes.

WHA will ensure that a 'written scheme of control' is developed and fully implemented for all properties risk assessed as requiring controls, in order to adequately manage the risk of legionella exposure.

- The system, e.g. developing a written schematic
- Who is responsible for carrying out the assessment and managing its implementation
- The safe and correct operation of the system
- What control methods and other precautions are required and what checks will be carried out to ensure risks are being managed and how often

WHA will ensure that a risk assessed approach for water hygiene safety is adopted as part of void re-let works, where applicable and we will provide information for tenants on the risks and how to safely prevent it.

WHA will ensure that robust processes and controls are in place to ensure that all remedial works identified through risk assessments and subsequent control activities are completed within reasonable timescale commensurate with the risk identified.

All heating installations relating to sheltered and supported properties and communal facilities now have installed TMV's where the risk assessment has identified the need for these to be installed.

WHA will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.

WHA will establish and maintain a plan of all continuous improvement activity undertaken with regards to water hygiene safety.

#### Follow Up Work

WHA will ensure there is a robust process in place for the management of any follow-up works required following the completion of a water hygiene and or legionella risk assessment or where identified by the competent person when undertaking required maintenance activities.

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WHA will ensure that there is a robust process in place to collate and record details of all remedial works and water testing completed against individual installations.

#### ROLES AND RESPONSIBILITIES

The Board has overall governance responsibility for health and safety and compliance and ensuring the organisation complies with all relevant legislation and regulation.

The Director of Operations will oversee the implementation of the Water Safety Policy, with operational support from the Head of Assets.

The Asset Compliance Officer will be responsible for overseeing the delivery, implementation and audit of this policy with support from the Property Services Officers

#### COMPETENT PERSONS

WHA will ensure that officers responsible for operational delivery receive appropriate training to be able to manage the service.

WHA will ensure only those legionella/water treatment contractors licensed by Legionella Control Association and/or equally approved will be permitted to carry out water risk assessments.

All associated water safety related works will be undertaken by suitably trained and competent contractors.

#### TRAINING

Appropriate basic awareness training will be provided to officers. This will include team and contractor briefings, e-learning and access to external training.

#### PERFORMANCE REPORTING

Robust key performance indicator (KPI) measures will be established and maintained to ensure WHA is able to report on performance in relation to water hygiene/legionella safety.

KPI measures will be provided at Senior Management Team and Board level and be produced on a quarterly basis.

WHA will carry out an independent audit of water hygiene and legionella safety every two years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify and non-compliance issues for correction.

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#### NON-COMPLIANCE

Any non-compliance issue identified at an operational level will be formally reported to the Head of Assets in the first instance. If non-compliance is due to refused access, then a risk assessment form id to be populated for evidence.

The Head of Assets will agree an appropriate course of corrective action with the operational team in order to address the non-compliance issue and report details of the same to the Executive Management Team (EMT).

EMT will ensure the Board are made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

#### DATA PROTECTION

When handling data sheets staff will come into contact with personal information. The handling and use of the data will be carried out under the General Data Protection Regulations 2018.

#### MONITORING AND REVIEW

We will monitor and report on compliance performance and use this information to identify areas for improvement.

This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory or best practice.

#### EQUALITY IMPACT ASSESSMENT

In implementing this policy, we aim to treat all customers fairly. An equality impact assessment has been carried out. Where customers require additional support, we will endeavour to provide a service that seeks to meet the needs of a particular individual or household.

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