



WATER SAFETY POLICY

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Executive Summary:
<p>Our water safety policy outlines how we provide a safe water environment in all our homes by promoting safe water practices and safety checks throughout the year to communal water systems. We employ a specialist in water safety to ensure water safety checks and advice are to the highest standard.</p>

Policy Grouping/Directorate(s)	Customer & Communities	
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EIA Completed	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Publication	Intranet <input checked="" type="checkbox"/>	Website <input checked="" type="checkbox"/>
Notes:	<p>This policy is currently undergoing a full review which is expected to be complete by November 2023</p> <p>This policy will remain in place until the review is complete.</p>	

1 Introduction

- 1.1 This policy outlines Rochdale Boroughwide Housings (RBH) approach to Water Safety across the Society. It sets out how we will comply with legislation in respect of the effective management of water systems, ensuring the health and safety of tenants, employees, contractors and the general public by minimising the risk posed by legionella.
- 1.2 In addition to this, the Policy provides assurance that measures are in place to identify, manage and/or mitigate risks associated with water. The Policy should be read in conjunction with the Water Safety Procedures.
- 1.3 The water systems in premises owned, managed, rented or operated by RBH are to be operated and maintained so as to control any unavoidable risk to health as low as is reasonably practicable through the correct implementation of a written scheme of control and records kept. This policy covers both domestic and commercial properties.

2 Context

- 2.1 This policy has been developed to ensure that RBH is compliant with all relevant water safety legislation.
- 2.2 Legionellosis is the collective name given to the pneumonia like illnesses caused by the legionella bacteria and includes the more serious and well known Legionnaire's disease, but also the similar but less well known conditions of Pontiac fever and Lochgoilhead fever.
- 2.3 All man-made hot and cold water systems are likely to provide an environment where legionella can grow. Where conditions are favourable (i.e. suitable growth temperature range, water droplets (aerosol) produced and dispersed, water stored and recirculated, some 'food' for the bacteria such as rust, sludge, scale, biofilm) then the bacteria may multiply, increasing the risk of exposure. The infection in humans is caused by breathing in contaminated air-borne water droplets.
- 2.4 Certain conditions within water systems will increase the risk of exposure to legionella bacteria:
 - The right temperature – the bacteria grow and multiply at 20-45°C.
 - They can survive low temperature but are killed by high temperatures; and
 - A source of nutrients – water systems can contain scale, rust and biofilm which can all act as a food source for the bacteria;
 - A means of creating an aerosol – shower heads and cooling towers can both create the right size of water droplets that can be inhaled.

3 Aims & Objectives

- 3.1 The promotion of water safety should be a mutual objective for employees, tenants, contractors and any other person or stakeholder who may work on, occupy, visit, or use its premises, or who may be affected by its activities or

services. The policy is to be used to ensure everyone understands the obligations placed on RBH to maintain a safe environment for all.

3.2 RBH will follow a systematic approach to the management of water safety to ensure it meets the requirements set out in The Control Substances Hazardous to Health (COSHH) Regulations and other relevant legislation relating to water safety. This is to ensure the safety of tenants, employees and members of the public.

3.3 The regulations require exposure to hazardous substances including biological agents (micro-organisms) such as legionella bacteria to be prevented, or where this is not reasonably practicable, adequately controlled. Specific advice on the measures that should be taken to control legionella bacteria in water systems is given in the HSE Approved Code of Practice Legionnaires' disease: The control of legionella bacteria in water systems (referred to hereafter as L8).

3.4 The key objectives are:

- Understand the duties in managing water safety
- Water safety management procedures and resources
- Management, production and recording of 'suitable and sufficient' water risk assessments (WRA)
- The promotion of water safety to tenants, employees and contractors
- Training

3.5 The policy fits with the mutual values of RBH:

Responsibility - We take responsibility where possible meeting the needs of people ensuring that all relevant properties are risk assessed and that we have a formal process in place to deliver any requirements identified in the water risk assessment.

Equity - This policy will help ensure a fair application to all those who may be affected.

Democracy - The approach has been developed in partnership with members through the consultation with Repairs, Asset Management and Health and Safety and has been approved by ELT.

Pioneering - The policy supports a forward-thinking approach to working with the relevant Enforcing Authorities and other partners to ensure we deliver the highest standard of water safety.

Collaboration - We will work with all team and external parties to deliver this policy.

4 Policy Statement

4.1 Duties as an employer and landlord in managing water safety

We will provide well maintained homes and premises improving water safety.

A 'responsible person' will lead the management of water safety and ensure compliance is achieved and maintained.

Accurate records will be held for each property owned and managed that is covered by L8. The records will detail the requirements for having a water risk assessment and all servicing, maintenance and repair of water safety measures

that are in place i.e. tanks, boilers and any other equipment relating to water safety.

We will periodically undertake an asset data review to ensure that water safety data held against each property assets is accurate and up to date.

4.2 Duties of employees in managing Water safety

We will ensure that they fully understand the obligations placed on them to ensure their own and others safety is maintained. All employees should ensure they have read the Water Safety Policy and associated Procedures.

4.3 Water safety management procedures and resources

A Water Safety Group (WSG) is in place to monitor our robust approach to water safety. The WSG report to the Home Safety Assurance Group (HSAG).

Effective communication is essential in delivering the water safety policy and we will therefore ensure that information relating to water safety will be made available to residents and building users via leaflets and information on our website.

RBH have a robust process in place to gain access should any tenant or leaseholder refuse access to carry out essential water safety related inspection and remedial works or where tenant vulnerability issues are known or identified to ensure compliance with this policy.

4.4 Competent persons

RBH will ensure that only suitably competent contractors and engineers, certified by a UKAS accredited certification scheme, are procured and appointed to undertake works to water safety equipment, systems and installations.

4.5 Management, production and recording of 'suitable and sufficient' water risk assessments (WRA)

RBH will commission competent persons to undertake water risk assessments (WRA) with the purpose of identifying the general water safety.

We will ensure that the type and frequency of a WRA carried out is appropriate to the building.

We will implement all necessary general water safety precautions and any other preventive and protective measures identified by a water risk assessment.

Any water risk assessment of a building will be reviewed following change in building use, changes to working practices that may affect water safety, following refurbishment works to a building, or as and when required following an independent water safety audit.

Robust processes will be in place to address all significant findings identified by water risk assessments, where practicable. Items will be within a programme of works to be completed within a reasonable time scale. These timescales will be detailed within the water risk assessments held for each property.

RBH's approach in respect of the management of water risk assessments will ensure that all water risk assessments are reviewed no later than the review date set by the current water risk assessment.

4.6 The management and provision of water safety equipment

There will be programs in place for delivering servicing and maintenance in accordance with all relevant British Standards and manufacturer's recommendations for all systems and equipment within buildings owned or managed.

4.7 The promotion of water safety to tenants, employees and contractors

Information about water safety, including prevention and protection measures is available to residents and building users. Up to date information on water safety will be available on our website.

We will ensure tenants are aware of the water safety management procedures for their home.

We will ensure employees, contractors and other relevant parties are aware of our management approach in respect of water safety.

Appropriate method statements will be agreed with contractors to ensure all relevant parties are fully aware of the extent to which works are being undertaken, access controlled and secured, so as not to endanger the safety of residents.

RBH will fully inspect any work associated with water safety to ensure works have not impacted or compromised the water safety measures in place for the premises.

4.8 Training

We will ensure that we identify and provide employees managing this area of compliance suitable training to enable them to carry out their duties concerning water safety. We will assess those in-house roles across the Society which require water safety training. The training will be provided by a suitably accredited training provider.

Training will include team briefings for those employees who need to have a basic understanding and awareness of water safety but who may not be actively involved in the delivery of the water safety policy. This will be basic water safety awareness training.

On the job training will be provided to those employees who will be responsible for managing the programme of WRAs, WRA reviews and programmes of servicing and maintenance to water safety equipment, systems and installations as part of their job role.

Tool box presentations will be delivered to RBH operatives and contractor partners in the form of appropriate water safety training.

4.9 How RBH manage non-compliance

Any non-compliance issues identified at an operational level will be formally reported to the

Director of Customer & Communities in the first instance.

The Director of Customer & Communities 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.

The Executive Management Team will ensure the relevant Committee and Board are made aware of any non-compliance issues, so they can consider the implications and take action as appropriate.

In cases of a serious non-compliance issue the Executive Management Team and Board will consider whether it is necessary to disclose the issue to the Regulator.

4.10 Accountability and responsibility

The employer is represented by the Chief Executive. The Chief Executive of RBH is therefore the overall 'Responsible Person' for ensuring that all water safety matters are implemented.

The Director of Customer & Communities is responsible for the implementation of this policy and associated procedure and is responsible for reporting performance to the Board.

5 Monitoring

- 5.1 All water safety work is monitored in the Water Safety System, reports are issued to the Water Safety Group. Key performance data is submitted monthly to ELT. Homes Safety Meetings are held every 6 weeks to discuss Water Safety. In turn, reports are submitted to the H&S Committee, SLT, Audit Committee and finally Board.

6 Review

- 6.1 All RBH strategies, policies, service standards and procedures are reviewed on a regular basis to ensure that they are 'fit for purpose' and comply with all relevant legislation and statutory regulations.
- 6.2 This policy will go through the full policy approval process every 3 years and will undergo a desktop review annually. This is to ensure that it is fit for purpose and complies with all relevant and statutory regulations.

7 Links with Other RBH Documents

- 7.1 This policy links to the following policies and strategies:
- Succeeding Together
 - Sustainable Growth Delivery Plan
 - Health & Safety Framework
 - Responsive Repairs Policy
 - Risk Management Policy
 - Water Safety Procedures

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