



Water Safety Policy

Board Approved: 24 May 2023

Next Review: May 2026

1.0 Scope

- 1.1 This Policy has been developed to ensure that Homes for Life (HfL) fully complies with the requirements of current Control of Legionella Bacteria in Water Systems - Approved Code of Practice and guidance. HfL is responsible for the safe delivery of domestic hot and cold-water supplies to its tenants and other users of its properties. As such HfL will only install appropriately approved plant and equipment and will, at all stages, ensure that the use of stored water is minimised or reduced.

2.0 Introduction

- 2.1 The purpose of this Policy is to provide a comprehensive set of instructions to HfL staff, tenants and sub-contractors regarding the management and control of Legionella and other water borne bacteria in all HfL properties, buildings, and offices.
- 2.2 Legionnaires' disease is a potentially fatal form of pneumonia which can affect anybody, but which principally affects those who are susceptible because of age, lifestyle, illness or immune suppression. Legionella bacteria are common and can be found naturally in environmental ground water sources such as rivers, lakes, and reservoirs, usually in low numbers.
- 2.3 Legionella can survive under a wide variety of environmental conditions and have been found in water at temperatures between 60C and 60C. Water temperatures in the range 20C to 45C seem to favour growth. The organisms do not appear to multiply below 200C and will not survive above 60C. The organisms may, however, remain dormant in cool water temperatures and multiply only when water temperatures reach a suitable level. Temperatures may also influence virulence; Legionella bacteria held at 37C have greater virulence than the same Legionella bacteria kept at a temperature below 25C.
- 2.4 Bacteria also require a supply of nutrients to multiply. Sources include commonly encountered organisms within water systems, such as algae, amoebae and other bacteria. The presence of sediment, sludge, scale and other materials within the system together with biofilms play an important role in harbouring and providing favourable conditions in which bacteria may grow. A biofilm is a thin layer of micro-organisms which forms a slime on surfaces which are in contact with water. Sludge, scale and biofilms can protect bacteria from temperatures and concentrations of biocides that would otherwise kill or inhibit these organisms if they were freely suspended in water.

3.0 Legal Requirements

3.1 Under the general Health and Safety Law, as a landlord (and/or person in control of premises/responsible person) and an employer, HFL must:

- Identify and assess source of risk;
- Prepare a course of action for preventing and controlling the risk;
- Implement and manage any identified courses of action by appointing person/s to have management responsibility (also known as the 'responsible person');
- Keep records and check the effectiveness of past actions completed;
- It is impractical to risk assess every individual residential unit and therefore a representative proportion of the premises will be initially assessed, on the basis of similar design, size, age and water supply, with the entire stock eventually assessed on a rolling programme of work; and
- Random sampling will also be undertaken to ensure the risk profile is managed.

4.0 Roles and Responsibilities

4.1 HfL, as the owner of the properties, is considered to be a Duty Holder under the Approved Code of Practice (ACoP) and Guidance (L8 fourth edition The control of legionella bacteria in water systems (2013) and the Chief Executive is responsible for undertaking or delegating the duties under this Guidance. These roles are delegated in accordance with the organogram (Appendix 1) and as per the full break down of roles and responsibilities detailed in the Written Scheme of Control (Water Safety Plan).

4.2 Each person who occupies a position of responsibility in the organisation must undergo the training as advised and sign to show that they understand the role and responsibilities assigned to them.

5.0 Managing the Risk

5.1 All water systems require a risk assessment but not all systems require elaborate control measures. A simple risk assessment may show that there are no real risks from legionella, but if there are, appropriate measures will be implemented to control these risks. The law requires that simple, proportionate and practical actions be taken to manage, prevent or control the risk and periodically check that any control measures are effective.

- 5.2 For most residential settings, the risk assessment may show the risks are low, in which case no further action may be necessary, e.g. housing units with small domestic-type water systems where water turnover is high. If the assessment shows the risks are insignificant and are being properly managed to comply with the law, no further action may be required, but it is important to review the assessment periodically in case anything changes in the system.
- 5.3 Tenants will be advised, as part of an ongoing communication, if the hot water is not heating properly or if there are any other problems with the system that this is reported to us eminently, so that appropriate action can be taken and that they should regularly clean and disinfect showerheads within their properties.
- 5.4 Action identified to control the risk should be monitored at suitable intervals to ensure effectiveness. They must be reviewed at least every two years or more frequently if changes to the system are made or risks change. A detailed list of considerations is contained in part 2 of the ACOP and Guidance (L8).
- 5.5 HfL will appoint a Responsible Person to manage all operational areas relating to Legionella. The Responsible Person will have sufficient knowledge and experience to appoint and manage specialist contractors in relation to Legionella.
- 5.6 All Records should be kept for a minimum of 5 Years.

6.0 Training

- 6.1 All HfL Staff involved with the control of legionella will receive, as a minimum, Legionella Awareness Training. This will be revisited on a bi-annual basis when the legislation is updated or when a member of staff moves into a new position.
- 6.2 The Responsible Person should complete, as a minimum, Legionella Responsible Person Training. This person should be fully aware of the housing stock and all aspects of the Written Scheme of Control. This will be revisited on a bi-annual basis or when the legislation is updated.
- 6.3 All HfL contractors should ensure their plumbers are trained in the correct drain down & start up procedures and in understanding how to reduce the risk in domestic properties to ensure the risk of Legionella is being adequately controlled. This may include attending Legionella Awareness Training; this will be revisited on a bi-annual basis.

7.0 Response to an Outbreak

7.1 In the event of an outbreak of Legionella, the “Responsible Person” will follow the emergency and or contingency plan that should include:

- Identification of the people who may have been exposed;
- Involvement of Public Health Authorities;
- Notifying the members of the Executive Team; and
- Notification of the Health and Safety Executive.

8.0 Notifiable Events

8.1 A breach of this Policy or in the event of serious, significant or material incident relating to matters covered by the Policy, HFL may be required to alert the Scottish Housing Regulator of the incident under Notifiable Events in accordance with the SHR’s guidance.

9.0 Policy Review

9.1 This Policy will be reviewed every 3 years or sooner if there are any legislative changes, or if arrangements within the plan are no longer considered to be adequate.