

OPS049 - Water Safety Policy

MONITORING FORM	
Department	Operations
Department Director	Diana MacLean
This policy is applicable to	Water Safety
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Internal /external consultees (if required).	

1. INTRODUCTION

Weslo Housing Management (WHM) has a responsibility to risk assess, keep safe for use and , if required, to regularly maintain water systems within blocks and to individual dwellings within its housing stock.

This policy explains how WHM's commitment to water safety will be met and it will be supported by a Water Safety Management Plan providing more detailed guidance and procedures.

2. TENANT CONSULTATION

This policy is based on legislative and regulatory requirements. There has been consultation with internal teams within WHM and tenant representatives.

3. SCOPE

For the purposes of this policy it is deemed to include WHM housing stock, all employees (permanent, temporary or contracted) and any other stakeholder if relevant to the Policy.

4. OBJECTIVES

The key objective of this policy is to describe how WHM will meet the required statutory, contractual and regulatory requirements in relation to water safety.

It will also cover how the WHM Board of Directors, as Duty Holder, will receive assurance.

The scope of this policy includes legionella management, scalding prevention, and un-adopted water systems.

WHM will comply with all current and relevant legislation and specifically as detailed in the following:

- Legionella Bacteria in Water Systems technical guidance (HSG 274) and approved code of practice L8.
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974, will also be met.

As a Registered Social Landlord, WHM must meet the requirements of the Scottish Housing Regulator's Scottish Social Housing Charter and the Scottish Housing Quality Standard (SHQS).

It is essential to ensure that customers, contractors, staff and visitors remain safe in WHM's properties.

Failure by WHM to properly discharge its legal or regulatory responsibilities may also result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- SHR's serious detriment judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

In order to comply with regulatory standards and legal obligations, and to ensure the safety of its customers, staff, contractors and other visitors to their properties, WHM will:

4.1 Process

- a. Provide clear lines of responsibility for the management of water safety supported by written guidance in the Water Safety Management Plan.
- b. Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake water safety checks, which shall include legal action when required.
- c. Proactively assess available data for relevant information about customers to help gain access (disability, vulnerability, local connections, etc.).

4.2 Delivery

- a. Regularly review existing properties and assess risk within new stock through a desk top review which will identify those properties at potential high risk of legionella.
- b. All properties with communal stored water systems, and where a potential risk has been identified at desk top review, will have a Legionella Risk Assessment (LRA) undertaken.
- c. All other properties identified through the desk top review of potentially high risk will be subject to an LRA to determine if further management is required.
- d. The review period for future risk assessments will be established through a risk-based approach within the initial LRA carried out by the competent person.
- e. A water safety management and monitoring programme will be established as required from the LRA findings.
- f. A sample of domestic properties without LRAs will be assessed within an ongoing annual programme of LRAs, to determine the level of risk and take action to ensure that staff, customers, contractors and visitors are not exposed to legionella bacteria.

- g. Void properties will be flushed and shower heads disinfected or replaced as part of the void management process or before the customer occupies the property if the property has been empty for longer than 7 days. An LRA will be carried out if appropriate.
- h. Implement measures to reduce the risk of scalding by installing Thermostatic Mixer Valves (TMVs) to high risk properties, as detailed within the Water Safety Management Plan.
- i. Remove lead pipework that may still exist within the housing stock as WHM is made aware.
- j. Maintain un-adopted water systems to the required standards as defined within the Water Safety Management Plan.

4.3 Contractors Competency

WHM has responsibility to ensure that contractors are competent and the following controls will operate to ensure competence can be demonstrated.

- a. Only those Legionella/Water Treatment contractors registered with and licensed by the HSE, / Legionella Control Association will be permitted to carry out work in WHM properties.
- b. All associated water safety related works will be undertaken by trained and competent contractors. This will include a competence assessment against the nature of the work to be completed for any proposed contractor.
- c. Carry out an assessment of all contractor competencies annually or at change of contract/contractor, as detailed within the Water Safety Management Plan

4.4 Internal Competency

- a. Maintain a skills/training matrix to ensure that all staff undertaking key roles within the scope of this policy have appropriate training.
- b. Operate a detailed competence framework including regular appraisals as part of the Water Safety Management Plan.

4.5 Data

- a. Maintain an up to date Master Database of all properties where it has a responsibility to provide water safety checks and maintenance.
- b. For each relevant property maintain up to date data confirming which aspects of the water systems and appliances within the scope of this policy exist and the organisation's associated responsibility.
- c. Where a requirement exists hold data and certification relating to the last two safety checks and the next due date.

- d. Where a requirement does not exist hold appropriate evidence.

4.6 Assurance

- a. Ensure that all persons involved with water safety are properly trained and accredited.
- b. Carry out works-based assurance activity including checks on certification and post-inspection of onsite works to the level stated within the Management Plan. A proportion of such checks will be carried out by an independent party.
- c. Set a timetable for the review of the Water Safety Policy and the associated Water Safety Management Plan.

4.7 Communication

- a. Encourage customers, through the provision of publicity information, to allow access to carry water safety checks and inspections and remedial works.

4.8 Monitoring Performance

- a. The following KPIs will be reported:
 - % of Priority Scheme Properties with a Legionella Risk Assessment.
 - % of General needs properties where a desk top risk assessment has been undertaken.
 - % of properties within a legionella maintenance regime where testing has been completed and valid certification is in place.
- b. Commentary will be provided for any properties for which the LRA is out of date to include the date they became overdue, number of days overdue, and their position within the access legal process to bring them back into a compliant position.
- c. Commentary will also be provided if any properties have outstanding overdue actions.
- d. To provide additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

The following assurance activity will be undertaken and reported in line with the Water Safety Management Plan:

- Internal audit
- Strategic review
- 3rd Party Assurance

4.9 Scheme of Delegation

- a. **The Duty Holder** and responsible authority for approving this policy is the **WHM Board of Directors**.
- b. **The Operations Director** is responsible ensuring the effective implementation of this policy.
- c. **The Responsible Person** for formulating this policy, reviewing and monitoring its implementation and managing performance against this policy is the **Technical Manager**.

5. EQUALITY & DIVERSITY

This Policy will always be carried out in accordance with WHM's Policy of Equality & Diversity which aims to promote diversity, fairness, social justice and equality of opportunity by adopting and promoting fair policies and procedures.

An Equality Impact Assessment has been carried out and actions identified are incorporated into the Water Safety Management Plan.

6. PUBLICISING AND AVAILABILITY

This policy is available on the WHM website, to the Board of Directors and staff members and any other key stakeholders. Copies are available free of charge. A summary of this policy can be made available in other formats and languages on request.

7. MONITORING & REPORTING

This policy will be reviewed regularly to ensure compliance with applicable legislative changes, changes within the organisation and best practice.

8. COMPLAINTS

Anyone wishing to make a **formal** complaint about the services provided by the organisation should do so using our Complaint Procedure.

Further information on how to make a complaint can be found at:

<https://www.weslo-housing.org/wp-content/uploads/How-to-Make-a-Complaint.pdf>

9. OTHER RELEVANT POLICIES AND PROCEDURES

This Policy relates to:

- a. The Landlord Compliance Strategy and;
- b. The Water Safety Management Plan

The above must be read in conjunction with this Policy.