



## Water Hygiene Policy

### 1.0 Introduction

- 1.1 We place significant importance on the health, safety and welfare of staff, residents, visitors, and others who our business activities may affect. This Policy will ensure we manage our water systems to help reduce the risk from legionella and other bacteria.
- 1.2 Legionnaires' disease is a potentially fatal form of pneumonia. Everyone is susceptible to infection. Some people are at higher risk.
- 1.3 Legionnaires' disease is contracted by inhaling small droplets of water (aerosols), suspended in the air, containing the bacteria. Certain conditions increase the risk from legionella.

### 2.0 Objectives and scope

- 2.1 We are a 'duty holder' as defined by the Control of Substances Hazardous to Health Regulations, and the Approved Code of Practice (ACOP) L8. We will take precautions to reduce the risks of people being exposed to legionella by:
  - Identifying and assessing sources of risk
  - Managing any risks
  - Preventing or controlling any risks
  - Keeping and maintaining the correct records
  - Carrying out any other duties as required.
- 2.2 This Policy relates to our employees, residents, contractors, stakeholders and other persons who our activities or services affect.
- 2.3 It covers all properties where we hold a maintenance and repairing responsibility.
- 2.4 Where our residents live in properties managed by third parties, we will manage the water hygiene in those properties in line with this Policy if it is detailed as our responsibility within the management agreement.

### 3.0 Roles and responsibilities

- The Chief Executive oversees sign-off and agreement of all Health & Safety (H&S) policies.
- The Chief Executive retains overall accountability for this Policy and implementation. Where the related management plan is a key



instrument outlining specific processes and tasks by colleagues across the business.

- The Senior Leadership Team is responsible for ensuring adequate resources are made available to meet the Policy objectives. Rolig Homes is the duty holder.
- The Chief Operating Officer is responsible for delivery of the key Policy objectives and for achieving the associated targets.
- The Chief Operating Officer is responsible for overseeing operational delivery, including the management of all contractors carrying out any works on shared water systems.
- The Directors are responsible for operational delivery and will be assigned as the Responsible Person and Deputy Responsible Person.
- The Chief Executive will direct Rolig Homes in meeting the requirements of relevant legislation and is responsible for ensuring the Policy is reviewed and updated in line with legislation.

## **4.0 Policy principles**

### **4.1 We will:**

- Appoint one or more Responsible Persons to manage our water hygiene responsibilities
- Carry out a suitable and sufficient Water Hygiene and Legionella Risk Assessment (LRA) on all relevant properties
- Record the significant findings of each risk assessment
- Produce and implement written schemes of control, as necessary
- Keep appropriate records of any management and associated monitoring activities
- Allocate sufficient resource to manage water hygiene
- Provide information, instruction, training, and supervision to relevant employees to enable them to perform their duties
- Carry out an LRA on all new blocks following handover
- Ensure all works on our water systems are carried out by suitably competent persons
- Implement an appropriate audit and assurance program.

## **5.0 Legionella risk assessments**

**5.1** We will carry out an LRA on all offices, commercial buildings, blocks with communal areas, and blocks with a shared water system.

**5.2** We will only permit a competent person to carry out our LRAs. We will only use specialist legionella contractors who are registered with the Legionella Control Association (LCA).



- 5.3 LRAs will be carried out in accordance with guidance document HSG274 and BS8580-1:2019.
- 5.4 We will record all remedial works in an electronic database and track them through to completion.
- 5.5 We will complete a new LRA when there is reason to suspect it is no longer valid.
- 5.6 We will complete a new LRA every two years in supported schemes.
- 5.7 We will not carry out individual LRAs to domestic dwellings unless there are exceptional circumstances.
- 5.8 We will carry out on-going monitoring and sampling activities as dictated by the LRAs, other than within the individual flats.
- 6.0 Remedial actions**
- 6.1 We will complete actions arising from LRAs and periodic monitoring within the timescales recorded, other than those suggested by the competent person that can be deferred to the next monitoring visit or RA.
- 6.2 Actions will be completed within the following timescales:
  - Urgent – within a week
  - High risk – three months
  - Moderate risk – six months
  - Low risk 12 months
- 6.3 We will measure action resolution times from the date the competent person completes the risk assessment on-site.
- 7.0 Inspection and monitoring**
- 7.1 We will conduct inspection and monitoring activities as set out in the scheme of control (Appendix A)
- 8.0 Domestic dwellings**
- 8.1 We consider the risks from hot and cold-water systems in most domestic properties with no shared water system to be low. This is owing to regular water usage and turnover.
- 8.2 We will implement simple, proportionate, and appropriate control measures to



ensure the risk remains low.

## **9.0 Void properties**

9.1 We will conduct an inspection of the water storage and distribution system in void properties and resolve any issues prior to handover. We will flush all outlets weekly for at least five minutes and not more than seven days prior to occupation.

9.2 We will put in place an appropriate regime to ensure the risk of legionella is controlled in long term void properties, i.e. total drain down of the system.

## **10.0 Thermostatic mixer valves**

10.1 In order to address the increased risk of scalding, we will firstly conduct Scald Risk Assessments, and if necessary install Thermostatic Mixer Valves (TMVs) to hot water outlets which are accessible by specific vulnerable persons.

## **11.0 Record keeping**

11.1 We will keep appropriate and up to date records and certification relating to the management of Legionella.

11.2 We will hold records electronically within an online cloud-based portal, asset database, and other systems as appropriate.

11.3 We will keep records in line with our Records & Data Retention Policy.

## **12.0 Competent Persons and training**

12.1 We will ensure suitable and sufficient training has been completed by personnel identified within the Water Hygiene Management Plan.

12.2 We will only use suitably competent consultants and contractors who are registered with the Legionella Control Association. We will use them to undertake LRAs, monitoring, and undertake remedial works relating to legionella control.

## **13.0 Regulatory standards, legislation, and Approved Codes of Practice**

13.1 The principal legislation applicable to this Policy is:

- Health and Safety at Work etc. Act, 1974



- The Management of Health and Safety at Work Regulations 1999
- The Control of Substances Hazardous to Health Regulations 2002.

13.2 The principal Approved Code of Practice applicable to this Policy is:

- L8 - 'Legionnaires' disease: The control of legionella bacteria in water systems' (4th edition 2013).

13.3 The principal guidance documents applicable to this Policy are as follows:

- HSG274 - Legionnaires' disease: Technical guidance Part 1: The control of legionella bacteria in evaporating 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 duty holders Leaflet (HSE Books 2012).

13.4 We will only use Water Regulations Approval Scheme (WRAS) approved products.

**14.0 What we've done to ensure this Policy is fair**

14.1 We recognise some residents may need adjustments due to a language barrier, disability, cultural need, or vulnerability. In these circumstances, in line with our Reasonable Adjustments & Vulnerable Needs Policy, we'll work with residents to ensure we consider their specific needs, on a case-by-case basis, provided it doesn't compromise health and safety to individuals or homes. This includes working in partnership with other agencies to ensure we manage and mitigate any known risks of safety and wellbeing. We aspire to embed diversity and inclusion within the culture of our business activities.

**18.0 Review**

18.1 We'll review this Policy every two years, or sooner if required.

<b>Effective from</b>	1 February 2025
<b>Approved by</b>	Nathan Stolborg
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<b>Policy owner</b>	Matt Smith
<b>Policy author</b>	Matt Smith



<b>Version history</b>			
<b>Version no.</b>	<b>Date</b>	<b>Summary of change</b>	<b>Author and approver</b>
1.0	01/02/25	New policy	Matt Smith / Nathan Stolborg