



WATER SAFETY POLICY COUNCIL HOUSING STOCK

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1.0 Introduction

- 1.1 This Policy outlines how Arun District Council (ADC) will comply with the Regulatory Framework for Social Housing in England as outlined below:
 - 1.1.1 meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.
- 1.2 ADC, as the Duty Holder, has specific duties (amongst others) under the Control of Substances Hazardous to Health Regulations 2002 to:
 - 1.2.1 Carry out risk assessments and implement control measures
 - 1.2.2 Control exposure to harmful substances.
- 1.3 ADC aims to protect the occupiers of its properties, visitors, staff, contractors and the general public, from the risks associated with water hygiene so far as is reasonably practicable. This document sets out key policy objectives, control measures and accountabilities to protect residents, staff and contractors from harm.
- 1.4 This policy applies to all ADC owned, managed and maintained residential buildings.
- 1.5 The requirements of this policy apply to leasehold dwellings only as required to maintain safety of the block.

2.0 Background

- 2.1 Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease. It also includes 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 of infection increases with age, but some people are at higher risk such as;
 - 2.1.1 People over 45
 - 2.1.2 Smokers and heavy drinkers
 - 2.1.3 People suffering from chronic respiratory or kidney disease, diabetes, lung and heart disease, or anyone with an impaired immune system
- 2.2 It is important to control the risks by introducing measures that do not allow proliferation of the organisms in the water systems and reduce, so far as is

reasonably practicable, exposure to water droplets and aerosol. This will reduce the possibility of creating conditions in which the risk from exposure to legionella bacteria is increased

3.0 Policy Objectives

3.1 Risk Assessments

3.1.1 ADC will carry out a Water Hygiene Risk Assessment (WHRA) for all Blocks across the portfolio, The WHRA will identify the need, if relevant, for a Written Scheme of Control for legionella identifying activities to reduce risk from legionella and other hazards. Generally, a Written Scheme of Control would only be necessary for Sheltered Housing Schemes and Temporary Accommodation Schemes

3.1.2 Use the outcomes from the WHRA to arrange programmes of routine monitoring and sampling of water systems, including, where needed, a programme of modification to any deficient systems and equipment.

3.1.3 WHRA's will be carried out:

Every 2 years in Sheltered Housing Schemes and Temporary Accommodation Schemes unless the risk assessor recommends more frequent assessments

3.1.4 Otherwise, they shall be carried out once only but reviewed:

When works affecting the shared water system have been completed

When vulnerability profile of the resident's changes significantly

On receipt of new information about risks or control measures

If a case of suspected/Legionnaires Disease is associated with the block

3.1.5 ADC will not carry out individual WHRA to dwellings unless there are special circumstances. A minimum of 10% of dwellings in a block, connected to any communal water system, will be surveyed. ADC will review the position regarding domestic WHRAs by July 2021

3.1.6 ADC will programme and commission WHRA from suitably qualified and accredited Contractors

3.1.7 WHRA's will be completed in accordance with guidance document HSG274 and BS8580-1:2019.

3.1.8 Maintain records of risk assessments, maintenance, monitoring and sampling and retain for at least five years – the Register

3.1.9 Carry out an inspection of the water storage & distribution system in vacant properties at new/change of tenancy. Water systems shall be flushed every week and prior to re-occupation.

3.2 Actions

3.2.1 WHRA describe actions that are required to be undertaken to remove or mitigate risks.

3.2.2 ADC will schedule and subsequently resolve actions, as far as is reasonably practicable, to reduce risk to a tolerable level.

3.2.3 The Risk Assessor carrying out the WHRA will allocate actions with a risk rating, and a target time to resolve, in line with the table set out below.

Priority Description	Resolution time
Very High	5 working days
High	3 months
Medium	6 months
Low	To be reviewed within 1 year

3.2.4 Action resolution times will be measured from the date the WHRA is submitted to ADC.

3.3 Inspection and monitoring

3.3.1 WHRA require a range of activities (in addition to actions) which will be completed and logged as set out below (regimes vary depending on the assets/risk level):

Frequency	Activity	By	Logged to
Weekly	Flushing of little used outlets – staffed sites	Arun DC staff	System or Logbook
Monthly	Audit weekly flushing of little used outlets Temperature checks of calorifier flow and return; Temperature checks of Sentinel and communal outlets		

Quarterly	Clean, descale and sterilise shower heads & hoses (communal)		
Annual	Storage Cistern temperature check & inspection		

3.4 Legionella Management Plan

3.4.1 ADC will maintain a set of water hygiene procedures and routinely carry out training with staff and contractors to ensure its requirements are understood.

The procedures will cover the following areas of management, amongst others:

- Allocation of specific roles and responsibilities to staff and contractors
- WHRA & Action Processing
- Routine monitoring & sampling
- Action Quality Control
- Customer communication
- Gaining access for essential works
- Training requirements
- Processes for incident management / emergencies

4.0 Legislation and Guidance

4.1 Arun District Council intends to meet its obligations under the following legislation:

- Control of Substances Hazardous to Health Regulations 2002
- Health and Safety at Work etc. Act, 1974
- Management of Health and Safety at Work Regulations 1999
- Housing Act 2004
- HHSRS – Housing Health and Safety Rating System

4.2 To meet the aims set out above Arun District Council will take account of the following guidance:

- Approved Code of Practice (ACOP) L8 - ‘Legionnaires Disease: The Control of Legionella Bacteria in Water Systems’
- HSG274 Parts 2 and 3
- BS8580-1:2019 ‘Water Quality – Risk Assessments for Legionella Control – Code of Practice

5.0 Policy implementation

- 5.1 The Chief Executive retains overall accountability for this policy. Arun District Council is the Duty-holder.
- 5.2 The Director of Services is responsible for ensuring adequate resources are available to meet the policy objectives.
- 5.3 The Group Head of Residential Services is responsible for policy implementation.
- 5.4 The Repairs and Maintenance Manager is responsible for delivery of the key policy objectives and for achieving the associated targets.

6.0 Monitoring and Quality Control

- 6.1 Arun District Council will monitor implementation of this policy using a set of performance measures as below:

Measure	Target	Reviewed by\interval
No. of blocks with current WHRA	100%	<u>Monthly</u> Repairs & Maintenance Manager Group Head of Residential Services
No. of overdue Actions	Zero	
No. of Open Actions	No target	
Monitoring & sampling regimes completed on target	100%	<u>Quarterly</u> Repairs & Maintenance Manager