



PEAKS & PLAINS
Housing Trust

The Trust

Water Hygiene Policy

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1. INTRODUCTION

1.1. The Executive Management Team of the Peaks and Plains Housing Trust ('The Trust') has approved this Water Hygiene Policy, to ensure that we meet our obligations as a Landlord and seek to provide assurance that water hygiene is adequately managed, while ensuring the safety and enduring health of our tenants, staff, contractors and the general public.

1.2. Compliance by staff and contractors

1.2.1. Staff and contractors shall comply with our Water Hygiene Policy and any associated procedures or guidance.

2. SCOPE

The Trust will ensure that:

2.1. Legal compliance is maintained and that good practice is promoted among staff and contractors.

2.2. Lines of responsibilities are understood.

2.3. Duty Holders and a Responsible Person are appointed.

2.4. Legal compliance and good practice are upheld and asset registers are kept up-to-date.

2.5. Risk assessments are detailed and thorough.

2.6. Compliance with water hygiene standards is routinely reviewed and monitored.

2.7. Competent Contractors are utilised to undertake deliver of works relating to water hygiene management and control.

3. DEFINITIONS

3.1. Legionnaires' disease – What is it?

3.1.1. Legionellosis is the collective name given to the pneumonia-like illness caused by legionella bacteria. This includes the most serious condition, Legionnaires' disease, as well as the similar but nominally less serious conditions known as Pontiac fever and Lochgoilhead fever. Legionnaires' disease is normally contracted by inhaling small droplets of water (aerosols), suspended in the air, containing the bacteria. Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection.

3.1.2. However, some people are at higher risk, such as:

- people over 45 years of age
- smokers and heavy drinkers
- people suffering from chronic respiratory or kidney disease
- anyone with an impaired immune system.

3.2. **Where are Legionella bacteria found?**

- 3.2.1. The bacterium Legionella Pneumophila and related bacteria are commonly occurring in natural water sources such as rivers, lakes and reservoirs, but usually in low concentrations. Since legionella bacteria are widespread in the environment, they may also contaminate and grow in purpose-built water systems including commercial systems such as cooling towers, evaporative condensers, hot and cold-water laundry systems and whirlpool spas. There are also a number of other systems that may pose a risk to exposure to legionella, e.g. humidifiers, air washers, emergency showers, indoor ornamental fountains etc.

3.3. **Legionella risks in housing**

- 3.3.1. Any water system that has the right environmental conditions could potentially be a source for legionella bacteria growth. There is a reasonably foreseeable legionella risk in a water system typically installed in the housing sector if:
- Water is stored or re-circulated as part of the operation of the system.
 - The water temperature in all or some part of the system is between 20–45°C.
 - Legionella bacteria replicate enthusiastically at an average normal human body temperature of 37°C.
 - There are sources of nutrients and a substrate (biofilm(s)) on which bacteria can multiply such as rust, sludge, scale and organic matter in the water.
 - The conditions are likely to encourage bacteria to multiply.
 - It is possible for water droplets to be produced and, if so, if they can be dispersed over a wide area, e.g. showers, splashing water falling from height into metallic sinks (albeit mainly in commercial kitchens) and aerosols from cooling towers and these droplets can be present in a person's ori-nasal breathing zone.

3.4. **Dealing with the risk**

- 3.4.1. After outlining the precursors to the risk, above the next stage is to outline the factors that are involved in eliminating the risks at source. These comprise, in general order of choice:
- Elevating temperatures of stored water systems to >60°C.
 - Ensuring cold water supply temperatures are <20°C.
 - Flushing out potable water systems, and taking hot and cold-water temperatures at sentinel taps.
 - Scrupulous cleanliness.
 - Physically or chemically cleaning out pipework to remove dust, scale, nutrients, substrates etc.
 - Removal of 'dead legs' or 'dead ends' in pipework where stagnant water may collect.
 - Undertaking 'shock chlorination' of higher risk systems.
 - Consideration of water dosing systems with chlorine dioxide where persistently high values of total number of colony forming units are monitored and reported.

4. OUR POLICY

4.1. Inspection and testing will be undertaken as identified in the table below.

Inspection	
Legionella risk assessment	Completed every two years – unless highlighted in risk assessment – on communal property where there is stored water or a communal water supply system Completed on higher risk domestic property based upon their water system installation
Testing	
Flushing Landlord's infrequently used outlets	Weekly
Temperature monitoring of communal systems	Monthly
Communal cold water storage tank monitoring	6 monthly
Communal cold water storage tanks, inspections, cleaning and disinfection	Annual
Communal calorifier drain valve, flushing and examinations	Annual
Water sampling on communal systems – Total Viable Counts (TVCs)	Annual
Water sampling of communal systems – Legionella	Annual
Communal Thermostatic mixer valve servicing	Annual

4.2. Remedial actions

4.2.1. Remedial actions will be completed in line with timescales recommended in the risk assessment.

4.1. Void Properties

4.1.1. All void properties should be reviewed based on their water and heating system, and an appropriate monitoring regime implemented. Shower heads on all voids will be replaced for new.

4.1.2. Routine Voids

Higher risk routine voids, based upon their water system installation, should have their water system flushed every 7 days until they are re-occupied.

Higher risk routine voids, based upon their water system installation, that have been void for more than 4 weeks between April and October should have their system chlorinated prior to re-occupation.

Lower risk routine voids, based upon their water system installation, should have their water system flushed prior to re-occupation.

4.1.3. Asset voids

Asset voids should either be drained down at void commencement and then re-charged prior to re-occupation, or flushed every 7 days until re-occupation.

Asset voids that have been empty for more than 4 weeks during April to October should have their system chlorinated prior to re-occupation.

4.1.4. Voids awaiting long term management decision

These properties should be drained down at void commencement and then refilled, flushed and chlorinated before re-occupation.

5. **EQUALITY, DIVERSITY & INCLUSION**

- 5.1. We recognise and value the diversity of our customers and our mission is to continually review and improve the service we offer customers. We aim to reduce barriers to ensure that everyone has equal access to our services, including those set out in this Water Hygiene Policy and are committed to treating everyone fairly, complying with all relevant legislation under the Equality Act 2010.
- 5.2. We will offer practical support for customers who may require alternative or additional support to facilitate the delivery of this Policy
- 5.3. An Equality Impact Assessment has been completed on this Policy

6. **RESPONSIBILITIES**

6.1. **Leadership and management**

- 6.1.1. Leadership of, and responsibilities for, the safe stewardship, management and control of risks relating to water hygiene rests with the Chief Executive, who is supported by the Executive Leadership Team and the Senior Leadership Team. There is a fundamental responsibility for all staff, employees and contractors to work safely with potable water systems in premises and to communicate, handle, notify and report hazards which they come across diligently to their line manager or director as necessary.

6.2. **Duty Holder(s)**

- 6.2.1. The Trust accepts its position as a Duty Holder and Landlord as defined in safety legislation. The Duty Holder is also responsible for defining and maintaining a register of properties which includes information relating to the water supply system and where applicable having a written control scheme.

6.3. **Technical advice**

- 6.3.1. The Assistant Director of Development, Asset and Compliance, on behalf of the SLT, will appoint a Lead Manager as Responsible Person (RP) to oversee the topic. Technical advice on safety issues and occupational health will be given to Managers, the EMT and the Board by in-house health and safety manager(s) and advisers, external consultant and contractors, or other independent appointees as necessary.

6.4. **Competence**

- 6.4.1. The Lead Manager should hold the relevant competencies, in terms of knowledge, abilities, training and experience (KATE) for the lead role in water hygiene. Where the person undergoes specific training for the role provision should be made for appropriate Continuing Professional Development and appropriate refresher training.

7. **SPECIFIC ROLES AND RESPONSIBILITIES**

7.1. **The Board**

Overall responsibility for Water Hygiene rests with the Board with operational authority delegated to the Chief Executive.

7.2. **Chief Executive**

The Chief Executive retains overall responsibility for implementation of all policy documents in any safety related field.

7.3. **Director of Operations**

The Director of Operations is responsible for ensuring that sufficient resources are provided and made available to implement this Water Hygiene Policy.

7.4. **Assistant Director of Development, Asset and Compliance**

The Assistant Director of Development, Asset and Compliance will ensure that the water hygiene policy, procedures, written control schemes and forms (electronic forms, databases or paper documents and registers) are maintained, reviewed, revised and audited in a timely manner.

7.5. **Compliance Manager**

The Compliance Manager will be responsible for managing and monitoring operational performance of water hygiene. Including:

- Ensuring adequate processes and procedures are in place to manage the risks arising from water hygiene.
- Ensuring suitable and sufficient information, instruction and training is carried out.

- Monitoring the performance of staff and contractors.
- Ensuring that members of the public, staff and contractors are not unnecessarily exposed to risk.
- Ensuring appropriate risk assessments are undertaken and that regular review is carried out.
- Ensuring appropriate inspections are made to assess the condition of potable water systems, supplies and equipment.
- Maintain property records and relevant certification(s).
- Maintain an up-to-date knowledge of legislative requirements and best practice
- Providing regular instruction and refresher training to maintain skills, provide advice on the application of these procedures on an individual case by case basis.

8. CONSULTATION

- 8.1. For future reviews of the policy, customers will be consulted if its implementation will have a significant impact on customers.
- 8.2. Customer feedback about the service will also be taken account of when the Policy is next reviewed – taking into account any complaints, suggestions or issues raised.

9. REVIEW

- 9.1. The Water Hygiene Policy will be reviewed as follows:
- Every 3 years;
 - Where there is a change in legislation;
 - Where there is a near miss, accident or RIDDOR reportable incident.

10. ASSOCIATED DOCUMENTS

- Site Specific Legionella Risk Assessments and written control schemes
- Water Hygiene procedure
- Health & Safety Policy

POLICY INFORMATION

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